

B2HAPPDoc8-063 DPO Public Comment_Brown S 2019-07-09	807
B2HAPPDoc8-064 DPO Public Comment_Browne 2019-06-20	809
B2HAPPDoc8-065 DPO Public Comment_Burns 2019-08-10	812
B2HAPPDoc8-066 DPO Public Comment_Carbiener 2019-05-22 to 08-19	815
B2HAPPDoc8-067 DPO Public Comment_Carlson 2019-08-21	850
B2HAPPDoc8-068 DPO Public Comment_Carroll D 2019-08-19	852
B2HAPPDoc8-069 DPO Public Comment_Carroll T 2019-08-19	855
B2HAPPDoc8-070 DPO Public Comment_Carroll V 2019-08-19	858
B2HAPPDoc8-071 DPO Public Comment_Carter 2019-08-21	859
B2HAPPDoc8-072 DPO Public Comment_Cavinato 2019-08-15	863
B2HAPPDoc8-073 DPO Public Comment_Cecilia 2019-06-20	932
B2HAPPDoc8-074 DPO Public Comment_Chamberlin J Owyhee Irrigation District 2019-06-18 to 08-19	933
B2HAPPDoc8-075 DPO Public Comment_Chamberlin W 2019-08-21	941
B2HAPPDoc8-076 DPO Public Comment_Cimon N 2019-06-20	958
B2HAPPDoc8-077 DPO Public Comment_Cimon S 2019-08-19	963
B2HAPPDoc8-078 DPO Public Comment_Clarke 2019-08-22	977
B2HAPPDoc8-079 DPO Public Comment_Clarke T 2019-06-26	983
B2HAPPDoc8-080 DPO Public Comment_Clay 2019-08-19	986
B2HAPPDoc8-081 DPO Public Comment_Cloud 2019-08-19	989
B2HAPPDoc8-082 DPO Public Comment_Collins A 2019-08-05 to 08-22	991
B2HAPPDoc8-083 DPO Public Comment_Collins E 2019-08-10	1010
B2HAPPDoc8-084 DPO Public Comment_Collins M 2019-08-10	1013
B2HAPPDoc8-085 DPO Public Comment_Collman 2019-08-17	1016
B2HAPPDoc8-086 DPO Public Comment_Comfort 2019-08-15	1018
B2HAPPDoc8-087 DPO Public Comment_Cooke 2019-08-22	1087
B2HAPPDoc8-088 DPO Public Comment_Cooper Elburn 2019-08-22	1093
B2HAPPDoc8-089 DPO Public Comment_Cooper Elizabeth 2019-08-22	1106
B2HAPPDoc8-090 DPO Public Comment_Cooper M 2019-08-11 to 08-18	1119
B2HAPPDoc8-091 DPO Public Comment_Corey 2019-08-22	1139
B2HAPPDoc8-092 DPO Public Comment_Cosgrove 2019-06-20 to 08-22	1147
B2HAPPDoc8-093 DPO Public Comment_Coulson 2019-08-22	1151
B2HAPPDoc8-094 DPO Public Comment_Creech K and F 2019-08-22	1161
B2HAPPDoc8-095 DPO Public Comment_Cremin 2019-08-20	1168

B2HAPPDoc8-096 DPO Public Comment_Crews 2019-08-12	1175
B2HAPPDoc8-097 DPO Public Comment_Culley 2019-06-18	1176
B2HAPPDoc8-098 DPO Public Comment_Danforth 2019-08-20	1180
B2HAPPDoc8-099 DPO Public Comment_Danibe 2019-08-10	1183
B2HAPPDoc8-100 DPO Public Comment_Daugherty 2019-08-21	1186
B2HAPPDoc8-101 DPO Public Comment_Davenport P 2019-08-22	1189
B2HAPPDoc8-102 DPO Public Comment_Davenport MR 2019-08-19	1191
B2HAPPDoc8-103 DPO Public Comment_Davenport R 2019-08-22	1194
B2HAPPDoc8-104 DPO Public Comment_DeFord 2019-08-21	1196
B2HAPPDoc8-105 DPO Public Comment_DeLashmutt 2019-06-20	1200
B2HAPPDoc8-106 DPO Public Comment_Deschner 2019-06-19 to 08-22	1203
B2HAPPDoc8-107 DPO Public Comment_Dill 2019-06-20	1216
B2HAPPDoc8-108 DPO Public Comment_Dinger 2019-08-19	1220
B2HAPPDoc8-109 DPO Public Comment_Doherty 2019-06-27	1225
B2HAPPDoc8-110 DPO Public Comment_Drummond 2019-08-22	1227
B2HAPPDoc8-111 DPO Public Comment_Duby 2019-08-19	1231
B2HAPPDoc8-112 DPO Public Comment_Duhr 2019-08-22	1234
B2HAPPDoc8-113 DPO Public Comment_Duncan 2019-08-22	1238
B2HAPPDoc8-114 DPO Public Comment_Durrant 2019-08-19	1258
B2HAPPDoc8-115 DPO Public Comment_Dutto 2019-05-23	1260
B2HAPPDoc8-116 DPO Public Comment_Ebel 2019-08-21	1272
B2HAPPDoc8-117 DPO Public Comment_Eekhoff 2019-08-22	1275
B2HAPPDoc8-118 DPO Public Comment_Elder P and V 2019-08-20 to 08-21	1296
B2HAPPDoc8-119 DPO Public Comment_Elliott 2019-07-27 to 08-05	1303
B2HAPPDoc8-120 DPO Public Comment_Evans B_ESC 2019-08-20	1312
B2HAPPDoc8-121 DPO Public Comment_Evans C 2019-08-19	1315
B2HAPPDoc8-122 DPO Public Comment_Farmer 2019-08-19	1328
B2HAPPDoc8-123 DPO Public Comment_Farnam 2019-08-10	1332
B2HAPPDoc8-124 DPO Public Comment_Fate-Cuthbert 2019-07-27 to 08-16	1336
B2HAPPDoc8-125 DPO Public Comment_Feves 2019-08-22	1361
B2HAPPDoc8-126 DPO Public Comment_Fey 2019-08-05	1364
B2HAPPDoc8-127 DPO Public Comment_Findley R 2019-06-18	1365
B2HAPPDoc8-128 DPO Public Comment_Flick J 2019-07-27 to 08-05	1370

TARDAEWETHER Kellen * ODOE

From: SA Brown <sabocta@gmail.com>
Sent: Tuesday, July 9, 2019 12:05 PM
To: B2H DPOComments * ODOE
Subject: B2H Draft Proposed Order

July 09, 2019

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

VIA E-MAIL: B2H DRAFT PROJECT ORDER

To: Members of the Energy Facility Siting Council

Thank you for the opportunity to comment on the B2H Draft Proposed Order.

Overall, I would want the B2H project to be stopped. I am sure that you heard this very clearly from many people during the recent public meetings held in eastern Oregon.

That said, my specific concerns are for the Oregon National Historic Trail, which the proposed B2H Transmission Line will cross in 17 locations. (page S-176).

This trail is part of a nation-wide, congressionally-designated system known as the National Trails System. On this trail are several federally built and managed visitor/interpretive centers, including one in Baker City, Oregon – the National Historic Oregon Trail Interpretive Center (NHTIC). The name itself conveys the significance of the historic resource to the American people. From this center, visitors from around the world can learn about the trail's heritage and see pristine trail ruts in situ.

When the NHTIC opened in 1992, its position on Flagstaff Hill offered visitors a sweeping view of the landscape emigrants passed through 175 years ago. The center's wall of windows purposely supported a desired visitor experience.

The Draft Proposed Order offers impact analysis at the NHTIC site in Exhibit S: Historic, Cultural, and Archeological Resources. On Table 4.1. "Project Effects to Aboveground Resources" on page 20 of the Historic Properties Management Plan, several Oregon Trail segments, including the Oregon Trail ACEC (Areas of Critical Environmental Concern, Bureau of Land Management designation) (site B2H-BA-282), will experience "Potential Adverse Effect" as a result of this project. Table 4.2 "Project Impacts to Oregon Trail Resources" on pp. 20-21 identifies eight trail resources, including the Flagstaff Hill component, that have the potential to be adversely affected by this project.

The Draft Proposed Order also offers impact analysis at the NHTOTC site in Exhibit R: Scenic Aesthetic Values. On page R-81 is the following statement:

"In evaluating various alternatives for Project siting, IPC concluded that potentially significant visual impacts from facility structures in the vicinity of the NHTOTC could result."

The strategy for mitigating these potentially significant visual impacts involves using shorter towers finished in weathered steel.

This is not acceptable. Do not allow the Idaho Power Company to destroy or even diminish this nationally significant cultural resource and historic and scenic view that support our understanding of the overland emigrant experience by installing a high power transmission line in front of the NHTOTC.

Instead of trying to mitigate impact by lowering and painting the towers, the Idaho Power Company should further investigate burying the power lines in the vicinity of the NHTOTC. The company should not dismiss this action by saying the cost would be too high.

What is the cost, not only to Oregonians, but to the thousands of national and international visitors who come to the NHTOTC each year and stand in front of those huge picture windows – only to see a diminished, or even destroyed, scenic and cultural view of the overland emigrant trail heritage? Too many people have fought over the years to protect what little remains on the ground of this nationally significant resource – the Oregon National Historic Trail. Once destroyed or trampled, the trail's resource integrity can not be restored.

Thank you for your consideration of my comments on the EFSC B2H Draft Project Order.

Sincerely

Sharon Brown
Western Region Representative
Oregon-California Trails Association
1221 SW 10th Ave, #318
Portland, OR 97205



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)

Ryan Browne

Mailing Address (mandatory)

Phone Number (optional) (541) 519-6942

Email Address (optional) browner@ou.edu

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.)

*
please
redact
address
SK

<p>1 In fact, the vegetation literally needs to burn to 2 regenerate.</p> <p>3 "The line will be an economic burden, enabled 4 by an out-of-date business model with increasing risk 5 and decreasing financial viability. An economist and 6 ex-president of the 'Society for Risk Analysis'" -- some 7 of these actually brought in by utilities -- "had this 8 to say about billion dollar investments such as this 9 one:</p> <p>10 "If you were silly enough to think about 11 investing in transmission, we would tell you that we 12 don't have any idea how you're going to get reimbursed 13 or how much you are going to get reimbursed.</p> <p>14 "The guaranteed rate-of-return offered up to 15 regulated utilities places that financial burden 16 squarely on the backs of ratepayers, removing money from 17 their pockets and" -- it takes it right out of the local 18 economies. That is what funding this thing will do, in 19 my opinion, because it's going to be obsolete long 20 before that 50-year financing lifespan. This provides 21 context for what I will be writing up.</p> <p>22 So you have a very difficult decision in front 23 of you. These paradigm shifts are difficult, I will not 24 kid you, but that's exactly what's going on, and we are 25 starting to see it now accelerate.</p>	<p>Page 110</p> <p>1 If you could imagine for a brief moment an 8th 2 grade me, getting dropped off near Table Mountain and 3 walking the Oregon Trail from Table Mountain to Hilgard 4 State Park. A popular kid, I guess, too good for 5 walking the Oregon Trail. I didn't listen, didn't pay 6 much attention.</p> <p>7 Fast forward, and unbeknownst to me, I married 8 a gal that is a granddaughter of the person that owns 9 the trail I walked or the property in which the Oregon 10 Trail sits. So now I'm here today.</p> <p>11 So as a person who helps out, caretake for 12 this property, my wife and I, we became aware of the B2H 13 power line about, around 2015, give or take.</p> <p>14 Fast forward a little ways, we ended up having 15 a meeting with some gentlemen in the back of the room 16 here from Idaho Power. I asked the question of why is 17 it that we are just now being made aware of this when 18 it's been in the works for some time. And basically 19 they didn't have an answer for it.</p> <p>20 Well, unbeknownst to these guys, I was aware 21 of a lot of the reasons why, and the reason why is 22 money. If we can't talk about the Glass Hill route, 23 apparently it's taboo, but it run into a lot of 24 litigation, I get it.</p> <p>25 So I know we can't take that into account, but</p>
<p>1 We had a congressman from Idaho just propose 2 that all the dams in the Snake River be taken down. The 3 BPA -- I'm on the Grande Ronde Model Watershed Board, 4 and I'm not speaking for them. BPA approached us and 5 told us that they expect that in the next cycle of 6 planning for the power distribution to the co-ops and 7 PUDs, we had them tell us quite clearly they expect a 8 lot of them are going to walk out the door. That's 9 because the power is getting cheaper from renewables.</p> <p>10 What's going to happen then is the cycle where 11 the people who are -- organizations, utilities that are 12 left on the grid, the BPA grid, will simply be charged 13 more, which means more of them will walk out, which 14 means the others will be charged more. That kind of 15 vicious cycle can just blow organizations apart.</p> <p>16 So there is great concern amongst the 17 congressional delegations and also amongst the power 18 plants in the Northwest.</p> <p>19 Thank you very much and good luck with your 20 decision. It's a tough one.</p> <p>21 HEARING OFFICER WEBSTER: Thank you.</p> <p>22 MR. RYAN BROWN: My name is Ryan Brown. I'm a 23 resident of La Grande, and I represent seven generations 24 of the Webster property, which looking west from 25 La Grande is the horizon that you see.</p>	<p>Page 111</p> <p>1 I was told that the comment period for the proposed 2 route and the alternative route had passed. Well, the 3 comment period for that was before we ever received the 4 letter.</p> <p>5 So my question to the gentlemen in the back 6 was: What happens if the poles that go in devastate the 7 property so much that we lose our water? There are 8 three springs on the property, all of which are within 9 200 or less feet of proposed towers. If we lose those 10 three springs, our property is no longer workable.</p> <p>11 When I asked them this question, and much like 12 in the ORS, the burden is on us as landowners. We have 13 to prove by paying somebody, we aren't going to do it 14 ourselves, but paying somebody professional to calculate 15 the flow of water and present what damage has been done. 16 Does that make any sense? After it's gone in we have to 17 prove. Is that backwards? Guilty until proven innocent 18 in our society; right?</p> <p>19 So fast forward a little bit more, we allowed 20 surveyors from Idaho Power, contracted surveyors, and 21 they walked right over the Oregon Trail; they didn't 22 even know it existed.</p> <p>23 I encourage you to listen to these people. We 24 are not attorneys, we are not going to comb through 25 thousands of papers. We don't have the time, it's</p>

Page 114

1 impossible. We have families, we have jobs. We can't
2 afford litigation. A lot of us, I can't speak for
3 everybody, but I know I can't. This whole process is
4 the sacrifice of a few to serve the many. It's a
5 divide-and-conquer approach. It's not right.

6 I have to answer the questions of my kids
7 almost every weekend when we work the property, when we
8 go to hunt, hike, whatever it is that we do. Why does
9 that power line -- meaning the existing power line --
10 why does that exist? I don't know, that was before my
11 time, but it's here. What are we going to do if another
12 one comes through? I don't know. Dad, how is this
13 legal, how can they take our property? I don't know.

14 Imagine that for a second, trying to answer a
15 9-year-old boy of how you can have property and people
16 just take it. It's impossible.

17 I feel like the Council should take into
18 account the ability of the average person to be able to
19 comb through this paperwork and to present an articulate
20 argument which is being requested and demanded of us.
21 It's impossible. The Council should take into account
22 the average person's ability to understand and to
23 articulate this.

24 So ORS says that we have to cite certain
25 things; recreation, hunting, hiking. Hiking the Oregon

Page 114

1 Tweit.

2 MR. ASHLEY O'TOOLE: Hi. My name is Ashley
3 O'Toole. I live at 2 1/2 Depot Street in La Grande.
4 Thank you to the Council for being here and staying here
5 with us to the bitter end and hearing what we all have
6 to say. I appreciate that.

7 I'll start with referencing a letter To the
8 Editor that appeared in "The Observer" that I wrote. It
9 was published online on March 7th of this year, titled,
10 "Nothing to gain, everything to lose: B2H Transmission
11 line is obsolete and devastating." I am just going to
12 read a few excerpts and sort of expand on a few of the
13 points.

14 "The B2H transmission line is a 20th century
15 solution in search of a modern problem that doesn't
16 exist. It's wasteful, obsolete and potentially
17 devastating."

18 La Grande has nothing to gain from this
19 project and everything to lose. It will ruin our
20 surrounding ecosystems, our hunting and recreational
21 grounds, and our historical sites, our property values,
22 our view of the surrounding mountains and our ability to
23 effectively protect ourselves from devastating
24 wildfires. All of this, to help a private corporation's
25 customers in another state receive hydropower originally

Page 115

1 intended for our state and Washington.

2 Since 2009, at least 12 similar proposals
3 across the country for these new high-voltage
4 transmission lines have been denied, and they have been
5 replaced by more cost-effective solutions.

6 I think that is it from the article. But as
7 you can see, I'm definitely of the Stop B2H crowd, not
8 move B2H crowd. So we hear people complaining about
9 this route or that route. Let it be clear, we really
10 are Stop B2H. I want to touch on a few points I think
11 from both of those routes, proposed routes.

12 I think I wanted to, at least first ask, just
13 because I'm not familiar with how long the Council has
14 been in town today or yesterday or tonight or tomorrow
15 morning, but I'm sure we have read the proposals, I'm
16 sure we have reviewed the engineering plans and
17 elevations and things. My question is: Perhaps, have
18 you yet physically been on Morgan Lake Road or do you
19 intend to be on Morgan Lake Road as you research this?

20 I think the points I wanted to make were how
21 steep it is and how sharp of turns those are, and I
22 understand that there could potentially be a mitigation
23 plan to that effect. I would love to see where in the
24 proposal in writing Idaho Power is really going to be
25 compelled to reach certain minimums with the municipal,

Page 116

1 Trail, the 8th grade me, wildlife, seeing it with my own
2 eyes; moose, elk, deer, several species, wolves.

3 So I'm happy to announce, Gail was being
4 modest, but the last bit of it is historic properties,
5 the historic property. We have since allowed
6 professional archeologists on to walk the trail, mark
7 the trail. It has been approved and recommended to the
8 National Historic Preservation Society as historic
9 property, in which how do you mitigate that? Just
10 because a marker -- or a tower rather, doesn't go right
11 in the middle of the trail?

12 Guys, we are talking 300 feet or less of not
13 only marked trail, some of the best marked trail that
14 you will see between here and the inception of Emigrant
15 Campground, burial sites. How do you mitigate that?
16 You can't. How do you mitigate it for the future
17 children? How do you mitigate that for the residents of
18 La Grande who may not even know about this?

19 I talk to people all the time who don't even
20 know this exists. Why the hell would they build another
21 power line? I can't answer that. You cannot mitigate
22 this. It's impossible.

23 Thank you.

24 HEARING OFFICER WEBSTER: Thank you.
25 Following Ashley O'Toole, we will have Kerry

August 10, 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: Soil Protection - Drill site 95/3; 95/4 on unstable and steep slopes

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground.

The applicable standard is: OAR 345-022-0022. (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 500kV 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; 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

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."

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 **Drill sites 95/3; 95/4** is within a mile of the heavily traveled I-84 transportation/utility corridor. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site Drill sites 95/3; 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area characterized by steep slopes and hazardous snow melts should be removed for consideration as a site for a transmission "facility". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed 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.

J. Burns
Homeowner 808 Main Ave, La Grande, OR, ~~97850~~
Property Owner Union County Airport, 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.

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.

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 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.

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



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) GAIL GARRISIENER

Mailing Address (mandatory) 2920 NE Connors Ave. Bend, OR

Phone Number (optional) (541) 312-1461 Email Address (optional) _____

Today's Date: 6/19/19

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 Tardaeether, 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)

GAIL CARBIENER

Mailing Address (mandatory)

2920 NE Conners Ave. Bend, OR

Phone Number (optional)

(541) 312-1451

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 Tardaeether, 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.)

Page 70

1 is the entrance, and they've talked about it a little
2 bit previously, where you come in off of Sunset onto
3 Modelaire and it splits to Hawthorne and Modelaire.
4 There is no sidewalks. It's the only entrance into the
5 place. There is a lot of bike traffic, a lot of kid
6 traffic, a lot of walking, people just walking up and
7 down that hill. And it's a potential hazard, big time.

8 Idaho Power has been very deceptive, and I've
9 had almost no contact with them whatsoever. I don't
10 know what to expect. All the information I'm getting is
11 just really meetings, and yet I'm going to have to sit
12 there. And it's getting close enough I'll hear the
13 buzzing. I'll see two towers. I see people walk up the
14 Oregon Trail all the time, and they'll have to sit there
15 and look at these huge towers as they are walking. It's
16 beautiful up through that little piece of property up
17 there.

18 I just found out about the blasting, which I
19 have a 565-foot well we put in when we did the house.
20 They are going to have to do some blasting there because
21 it's solid rock.

22 So it's just a potential hazard all the way
23 around, as far as -- I'm not going to gain -- I will
24 have no gain. Looking at these things, I'll have to
25 listen to them, and I don't gain anything from them. So

Page 70

1 I don't think it's -- I'm not really sure how they can
2 actually come and do that.

3 So anyway, so that was the third time I was
4 contacted was in 2017. Then I was actually -- somewhere
5 around the end of 2017, a gentleman with Idaho Power, I
6 believe his name was Jeff Maffuccio, or something like
7 that, came up to the property. We discussed a few
8 things. I voiced my concerns one more time with him.
9 Then we discussed -- we discussed about maybe put a road
10 in a different spot, the one up there. But I don't know
11 who is going to -- as far as I can tell, they will just
12 come in and just use the one in front of my house, and
13 there's nothing I can do about it.

14 I also live in the area, and a couple of
15 people have mentioned, about the '73 fire actually
16 burned where my house sits, right across that property.
17 So that's another concern of mine as well.

18 I don't think there has been any environmental
19 impact statement done on that particular route right
20 there either. They said something about there was one
21 done somewhere nearby, but I'm not sure how close that
22 was or anything.

23 But I'm just going to ask that you guys take
24 us into consideration. We have to live and deal with
25 this and with no gain on it. Especially from my

1 perspective up there, like I said, Idaho Power has
2 contacted me a total of four times, and I really don't
3 know about what is going on or anything. I think they
4 should be a little more inclusive to people who are
5 going to be impacted by this.

6 So I want to thank you guys for listening, and
7 take some of these things into serious consideration in
8 making your decision.

9 Thank you very much.

10 HEARING OFFICER WEBSTER: Thank you.

11 MR. GAIL CARBIENER: I'm Gail Carbiener. I'm
12 from Bend, Oregon, but behind me are lots and lots of
13 friends. It's almost as if I live in this county I'm
14 over here so frequently. I represent the Oregon Trail.
15 That is a national organization whose job it is to do
16 what we can to protect and preserve the trail as well as
17 educate the public. I'm proud to say that our national
18 organization is a member of Stop B2H and has donated a
19 substantial amount of money to their effort to Stop B2H.

20 On Exhibit S, Historic Properties Management
21 Plan, at 7.2.3, which is the field crew definition, I
22 would like to add an expert from the Oregon Trail's
23 Association to be a member. There is many, many
24 instances in the documents presented for the Oregon
25 Trail where the Oregon Trail is misrepresented,

Page 71

Page 72

1 sometimes not even on the maps and, therefore, you need
2 an expert, and there is none on that field crew. You
3 have got my specific recommendations in writing.

4 Also, I'm glad to hear that Kellen led off
5 tonight with information about fire. Last night she did
6 not. And I mentioned that Idaho Power's fire prevention
7 plan is not only weak, it is less specific than I think
8 you are requiring us to be. For example, Idaho Power
9 last night responded to the chairman's question about
10 have they submitted a draft fire prevention plan, and he
11 said that it will be submitted. That is my
12 recollection.

13 They not only submitted a draft fire
14 prevention plan, but it was forwarded to the Forest
15 Service and to the State Forestry fire prevention and
16 corrections, and suggestions were submitted. However,
17 in the draft project order, the fire prevention plan has
18 not changed. I suggest that they do that.

19 I recommended a couple of things in the fire
20 prevention plan: (1) cameras could be posted to cover
21 the area of the power line if, in fact, it is to be
22 built; (2) Idaho Power recommends that a watch person,
23 an individual watch person be present to report fires
24 during construction. My recommendation is that Idaho
25 Power provide a crew with a wildfire engine, Category 3,

<p>1 which is used by most of the wildfire prevention 2 districts, to be present during construction at all 3 times, including after hours when the vehicles and 4 equipment are being serviced.</p> <p>5 Last, but not least, the vegetation management 6 plan that is presented by Idaho Power is a copy of 7 PacifiCorp's vegetation management plan. They did not 8 even take off PacifiCorp's logo. How insulting can that 9 be?</p> <p>10 So I hope that you will hear the people here 11 tonight, and that you will turn down and reject the 12 current B2H.</p> <p>13 Thank you.</p> <p>14 HEARING OFFICER WEBSTER: Thank you.</p> <p>15 Let's take a break. Let's come back at 6:40, 16 and then we will then be calling Irene Gilbert to 17 testify followed by John Williams.</p> <p>18 Thank you all. (Recess taken.)</p> <p>19 HEARING OFFICER WEBSTER: We are back on the 20 record. We are going to be hearing from Irene Gilbert, 21 and following Irene we will be hearing from John 22 Williams.</p> <p>23 SECRETARY CORNETT: Before we begin, I'd like 24 to make a quick announcement. For those of you who will</p>	<p>Page 74</p> <p>1 recognize or honor the federal protections for 2 threatened and endangered species; in fact, it removed 3 them from their rules. I asked Representative Greg 4 Smith to get a response from Oregon legal Council about 5 whether or not that was legitimate or legal. And the 6 response that he got was, Well, they can get away with 7 it if -- and this was a written response -- as long as 8 they include all those animals in their habitat section 9 of the evaluation.</p> <p>10 They do not cover all of the threatened and 11 endangered or federally protected species; and, in fact, 12 it says that pretty much if they run into them, sort of 13 as an aside, they will note it. So I think that's a 14 problem.</p> <p>15 I think that when you read through these site 16 certificates, there is a lot of use of language to 17 misdirect people. And in the thousands of pages of 18 information they provide they say things like: There 19 will be no direct impacts on things like the Oregon 20 Trail. That means they won't put a tower right in the 21 middle of the trail.</p> <p>22 They have done other things, like with Ladd 23 Marsh, they rated it on a 30-point scale, they rated the 24 views from Ladd Marsh and rated it an 11. So I would 25 say that is a long ways from 30. And when they say they</p>
<p>26 come in a little bit later -- Max, can you raise your 27 hand back there? Max. Cliff, in the red shirt, if 28 anybody has come in late, we have comment cards. If you 29 would like to make a comment, please fill out a card. 30 Max is holding them up right now. Go back and talk to 31 him. You can fill them out and then he'll bring them up 32 to us. Thank you.</p> <p>33 HEARING OFFICER WEBSTER: Also, if there is 34 anybody that is on the phone that would like to give a 35 comment telephonically, please speak up now so we can 36 accommodate you. We are going to put the phone callers 37 in at the end of the in-person testimony, but we need to 38 know if anybody is on the line so we can have time for 39 you. Hearing none, we will proceed and time it as if 40 there is nobody on the phone that wants to participate.</p> <p>41 So, Ms. Gilbert, thank you.</p> <p>42 MS. IRENE GILBERT: My name is Irene Gilbert. 43 I live at 2310 Adams Avenue here in La Grande. I come 44 representing myself. I'm also the legal research 45 analyst for Friends of the Grande Ronde Valley and a 46 member of the board for Stop B2H.</p> <p>47 I want to make a few just really quick 48 comments before I get into the main part of my 49 presentation. But this is some of the concerns that I 50 have: The Oregon Department of Energy does not</p>	<p>Page 75</p> <p>1 are protecting raptor nests, that means they won't cut 2 one down as long as there are young in the nest; but if 3 the young are not there, they will cut it down and put a 4 tower right next to it.</p> <p>5 So those are the kind of individual things 6 that I hope people are looking at and commenting on. I 7 could give you 50 others.</p> <p>8 Anyway, you previously heard from me in some 9 level of detail about noise and weeds resulting from 10 this development. I'd like you to keep in mind that the 11 recommendations from the Oregon Department of Energy in 12 the draft proposed order only give information in 13 support of their recommendation.</p> <p>14 So I hope that you thoroughly consider the 15 comments and the written comments that you will receive 16 from the rest of the community here.</p> <p>17 One thing that happened is Idaho Power chose 18 to identify the minimum amount of land that they 19 possibly could as a part of their site. So what that 20 means is things like to notice those people who are 21 impacted that they have to notify people with 250 feet 22 of it, they really limited the amount of people who got 23 to know that this was happening. They also then got to 24 minimize the damages from things like farm and 25 forestland impacts. They didn't have to do surveys in a</p>



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) GAIL CARBISIENER

Mailing Address (mandatory) 2920 NE Connors Ave. Bend, OR

Phone Number (optional) (541) 312-1461 Email Address (optional) _____

Today's Date: 6/19/19

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 Tardaeether, 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 46</p> <p>1 HEARING OFFICER WEBSTER: Thank you. 2 After Mr. Meyer, we will hear from Laurie, is 3 it Solisz?</p> <p>4 MR. MIKE MEYER: My name is Mike Meyer. I 5 live in Baker City. This will be one of them less 6 effective comments.</p> <p>7 HEARING OFFICER WEBSTER: Mr. Meyer, I think 8 just for the record we do need an address more specific 9 than just Baker City.</p> <p>10 MR. MIKE MEYER: And why do you need my 11 address?</p> <p>12 HEARING OFFICER WEBSTER: So that we can 13 provide you notice of the things that are happening.</p> <p>14 MR. MIKE MEYER: Do I -- mailing address?</p> <p>15 HEARING OFFICER WEBSTER: Mailing address.</p> <p>16 MR. MIKE MEYER: Mailing address?</p> <p>17 HEARING OFFICER WEBSTER: Yes.</p> <p>18 MR. MIKE MEYER: Is 3155 Grove Street, Baker 19 City, Oregon.</p> <p>20 HEARING OFFICER WEBSTER: Thank you.</p> <p>21 MR. MIKE MEYER: I find it unfathomable that 22 anyone from Idaho, including Idaho Power, has the 23 audacity to rape 71 miles of Baker County with what I 24 think will be unnecessary and outdated towers by the 25 time they're ever put in. And I also would like to</p>	<p style="text-align: right;">Page 48</p> <p>1 on with the Interpretive Center, which is a beautiful 2 museum -- and if you people are not from here, I would 3 highly recommend you going there. It is so inspiring. 4 I cry every time I go. This bump is the Interpretive 5 Center. So this is looking east. The Interpretive 6 Center looks west, which is the towers are going to come 7 up, supposedly not be able to be seen, under the 8 Interpretive Center.</p> <p>9 So we have about 300 acres. We already bear, 10 our particular property already bears the burden of the 11 high-voltage 230 line. That was placed in 1950. That 12 line, they gave my ancestors, who thought it was a good 13 idea to help get electricity, a little bit of money. 14 However, 60 years later, we still have the line on our 15 property. It impacts our ability to do crops, it 16 interrupts our grazing. They were sagging close to the 17 ground. My husband was in jeopardy on his tractor this 18 last year. There's not much maintenance that goes on 19 with these lines.</p> <p>20 So the B2H, and you've already heard about the 21 right-of-way difficulties that are going to be expected. 22 We've already had impact from the B2H; people, they've 23 entered our land without permission, claimed ignorance, 24 they drive on our property, they've flown over with 25 helicopters, interrupted the cattle. So we've already</p>
<p style="text-align: right;">Page 47</p> <p>1 shame anyone that would ever permit this to happen. 2 Thank you.</p> <p>3 HEARING OFFICER WEBSTER: Thank you. 4 Following Ms. Solisz, we'll hear from Gail, is 5 it Carbiener?</p> <p>6 MR. GAIL CARBIENER: Close.</p> <p>7 HEARING OFFICER WEBSTER: Sorry for maiming 8 names.</p> <p>9 MS. LAURIE SOLISZ: My name is Laurie Solisz. 10 I'm a direct descendent of the land that this is going 11 to go across. My mailing address is P.O. Box 1110, 12 Baker County, Oregon.</p> <p>13 So what I have brought today, I'm not very 14 high tech, but I have provided some pictures of how this 15 will impact our property, which is directly below the 16 Interpretive Center. I have four pictures here, and the 17 shadow, which is so interesting how this works, this is 18 what happens in the morning, sunrise, the shadow falls 19 directly on the line where the transmission line is 20 proposed, which I find very fascinating.</p> <p>21 We don't have -- we just -- and this is a 22 picture of how the line will go across these hills. And 23 I will leave these pictures with you. The little bump 24 on the hill is the Interpretive Center. So if anyone 25 thinks that this isn't going to interrupt what's going</p>	<p style="text-align: right;">Page 49</p> <p>1 experienced disturbance. And everyone claims ignorance, 2 Oh, we didn't mean to do that. Well, we didn't think, 3 and so forth. But it happens, and we are the ones that 4 bear that burden.</p> <p>5 Well, I guess I ran through all my thoughts.</p> <p>6 Any questions?</p> <p>7 HEARING OFFICER WEBSTER: Do you want to leave 8 the photos?</p> <p>9 MS. LAURIE SOLISZ: I would.</p> <p>10 And if you have any questions, you can always 11 ask.</p> <p>12 HEARING OFFICER WEBSTER: Any questions, 13 Council? Thank you.</p> <p>14 MS. LAURIE SOLISZ: Thank you for listening. 15 Thanks for coming.</p> <p>16 HEARING OFFICER WEBSTER: We will next, after 17 we hear from you, we will hear from Wayne -- is it 18 Kaaen?</p> <p>19 MR. WAYNE KAAEN: You're doing good on the 20 names.</p> <p>21 HEARING OFFICER WEBSTER: Thank you.</p> <p>22 MR. GAIL CARBIENER: My name is Gail 23 Carbiener. I live in Bend, Oregon, on 2920 Northeast 24 Conners Avenue. I represent the Oregon-California 25 Trails Association. I have been before the Council</p>

<p style="text-align: right;">Page 50</p> <p>1 before.</p> <p>2 Tonight I'm speaking a couple of times to the 3 people behind me. Because if you read the literature 4 that Idaho Power has provided in the fire prevention 5 area, it's as if the California fires never existed. 6 They have a sentence in there that says: "In operation, 7 the B2H line will not significantly increase fire 8 potential."</p> <p>9 Now, the State of California, and the day 10 before yesterday the State of Nevada, have legislated 11 that their utility companies prepare a detailed fire 12 prevention plan. I have sent to the Chairman my letter 13 with details on what I think Idaho Power should do.</p> <p>14 The other thing that I would like to talk to 15 the people sitting behind me, is in reclamation. Idaho 16 Power says that the power line will be active in 17 perpetuity; that means forever. They provide no data, 18 no references. 500-kilovolt power lines in the state of 19 Oregon have begun in the 1980s. That's not a hundred 20 years.</p> <p>21 What's more, in reclamation, they say because 22 it's going to be forever, they're shifting the risk of 23 reclaiming the land to the public for the first 24 50 years, because they're not going to bond reclamation 25 after and during from the time that it's in operation</p>	<p style="text-align: right;">Page 52</p> <p>1 that's working for Idaho Power, in the burying of a 2 power line in Hailey-Sun Valley, Oregon [sic], that 3 they're having difficulty with because of scenic views. 4 POWER Engineering says this 1 1/2 miles here at the toe 5 of the foothill, sagebrush off irrigated land will cost 6 \$111 million.</p> <p>7 If it's just a straight line, it doesn't cost 8 that much. In reality, they have not had a foot on the 9 ground that they have documented. They've not turned 10 over a shovel of dirt in front of that Interpretive 11 Center that they've documented. I've documented the 12 Chino Hills, and I've talked with those people. And 13 they say it's probably 50,000, but that's their guess -- 14 50 million, excuse me.</p> <p>15 You will receive other letters from me rather 16 than speaking this last 4 minutes, but I would certainly 17 hope that you would seriously consider the 18 undergrounding. POWER Engineering in their estimate 19 states that they are a Level 5 estimate, based on their 20 civil engineering standards. They have given the 21 definition of a Level 5 as ratio, ballpark, blue sky, 22 seat of the pants, idea study, prospect, estimate, 23 concession, license, or guesstimate. That's their 24 definitions. You've got to do better.</p> <p>25 Thank you very much.</p>
<p style="text-align: right;">Page 51</p> <p>1 until the first 50 years. Now, that's like not insuring 2 a new home because you don't think it's going to burn 3 down until it gets old.</p> <p>4 They don't provide any data. Hard data. And 5 what's more -- I'm looking at Todd -- what's more, it 6 concerns me that the EFSC can approve without requiring 7 more detail.</p> <p>8 Now, in the last 7 minutes, I have sent you 9 this letter as well, and again, I'm talking to the 10 people behind me, wearing my Oregon Trail cap. Exhibit 11 BB, section 3.4.2, the conclusion regarding 12 undergrounding the power line. Idaho Power continues to 13 says it's too expensive. I have sent to Mr. Beyeler, 14 the Chairman, and I don't know how far my letters go, 15 pictures of a comparison of 3.7 miles down in Chino 16 Hills, California, of a 500-kilovolt power line that was 17 put underground for 3.7 miles. Almost every foot of 18 that ditch had a infrastructure under the ground. That 19 cost \$224 million.</p> <p>20 I've recommended, as I hope people in the 21 audience have, that the line be put underground in front 22 of the Interpretive Center.</p> <p>23 For illustration purposes, Idaho Power has 24 used 1 1/2 miles and asked POWER Engineering, one of the 25 consultants, it's a good firm, but it's a consultant</p>	<p style="text-align: right;">Page 53</p> <p>1 HEARING OFFICER WEBSTER: Thank you. 2 After we hear from Mr. Kaaen, we will hear 3 from Bruce Owen. And if anybody else that has not yet, 4 that wants to be heard tonight, if you have not 5 completed a comment form, please do so and provide it to 6 staff. I think we will, after Mr. Owen, we've run out 7 of comments, people who want to comment at this point, 8 so we will take a break after that. And if anybody else 9 wants to be heard, we'll reconvene and hear from you.</p> <p>10 UNIDENTIFIED SPEAKER: Can we have it quieter 11 in here? It's really noisy in the back. Can you 12 address the noise in the back of the room, please.</p> <p>13 HEARING OFFICER WEBSTER: Well, I know that we 14 do have some people coming in to get their tacos and --</p> <p>15 UNIDENTIFIED SPEAKER: It's really hard to 16 hear.</p> <p>17 HEARING OFFICER WEBSTER: Is it?</p> <p>18 UNIDENTIFIED SPEAKER: Yes, it is.</p> <p>19 HEARING OFFICER WEBSTER: I'm sorry about 20 that. And when you speak, if you'll speak into the 21 microphone.</p> <p>22 MR. WAYNE KAAEN: Certainly.</p> <p>23 My name is Wayne Kaaen. I'm from Halfway, 24 Oregon. Post Office Box 402, Halfway. I have property 25 which B2H is impacting. Obviously that's why I'm here.</p>

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, July 3, 2019 4:53 PM
To: B2H DPOComments * ODOE
Subject: Response
Attachments: B2H - EFSC letter 9 Ore Trail.docx

Kellen:

Here is my response to the DPO. Please notice the Baker City-Baker County wastewater facility in the same area as B2H. Also notice there is a class 1 trail segment that has not been identified, to my knowledge, on maps or in the text where B2H crosses. Noise study does not include the Trail, especially near the Flagstaff Hill area.

best
Gail Carbiener

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

July 3, 2019

Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR 97701-7927

VIA E-MAIL: B2H DRAFT PROJECT ORDER

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. I represent the *Oregon-California Trails Association* (OCTA), whose mission is to protect and preserve the emigrant trails. 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,” 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. **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.**

3. 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.
4. The DPO does not meet the standards required for Exhibit T Recreational Facilities, 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.
5. 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.
6. The Baker City-County plans to construct a treated wastewater storage lagoon, irrigation site and effluent transmission pipeline in the same location as the B2H to the west of the Interpretive Center. Neither has referenced the other, certainly EFSC must determine affect upon the B2H.

In summary, the Oregon Trail along the route of the B2H has the most damaging affects 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.

Gail Carbiener

A handwritten signature in black ink, appearing to read "Gail Carbiener". The signature is fluid and cursive, with a distinct flourish at the end.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, May 22, 2019 4:35 PM
To: TARDAEWETHER Kellen * ODOE
Subject: B2H

Hi Kellen:

My eyes are tired, but I have a glass of wine.
Look at -PA-02, you may mean Morgan Lake not Ladd Marsh.

good job, but lots of data.
gail

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Saturday, May 25, 2019 5:05 PM
To: B2H DPOComments * ODOE
Subject: DPO Comments
Attachments: B2H - EFSC letter 1.docx

Kellen Tardaewether:
Attached are my comments for B2H.

Sincerely
Gail Carbiener

May 26, 2019

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

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment and object.

I object to the **“Conclusion Regarding Undergrounding of the Project”** at Exhibit BB, Section 3.4.2 reached by Idaho Power and supported by Staff.

The text at page BB-7 states in part: “*because of the high cost of an underground line compared to overhead 500-kV lines, unproven technology over long distances for 500-kV, reliability and reactive compensation issues for long installations, and increased land disturbance, the alternative of placing the 500-kV line underground was not considered feasible for the Project*” These conflicting points all come from a 2009 National Grid publication that is currently out of date.

Reliability, Reactive Power Compensation and Environmental issues are not significant in a 2.25-mile underground line. The 2009 National Grid publication refers to “long distances and long installations” when describing these three issues. Cost continues to be the major reason for not considering a short underground in front of the Oregon Trail Interpretive Center near Baker City.

Power Engineers, who is the major contractor for Idaho Power’s 138-kV line in Blaine County near Hailey, Idaho, provided estimates of B2H costs. **There is no indication or reference that they have set foot on the ground at the site in Oregon.**

Power Engineers estimate the cost to be \$102 million to \$111 million for the 1.5 miles in front of the Interpretive Center. Using AACE Cost Estimates with a 50% contingency and a Class 5 MATURITY LEVEL OF PROJECT DEFINITION DELIVERABLES, expressed as 0% -2% of complete definition, this is the least confident estimate allowed.¹ The only reference used by Power Engineering was the 3.7 mile, 500-kV underground line in Chino Hills, California constructed by Southern California Edison at a cost of \$224 million.

The Chino Hills project crossed two major thoroughfares, several minor roadways, a shopping center, two flood-control channels and two holes of a golf course. One-third of the alignment was on a 15 percent average grade, with slopes as steep as 35 percent in some locations. In all, the project involved the installation of approximately 17,000 linear feet of duct bank and numerous horizontal drills ranging from 800 to 2,100 feet in length.²

¹ www.aacei.org

² Underground construction magazine 5/7/2017

Compare these two sites:

Below is only 400 feet of the underground 500-kV line in Chino Hills.

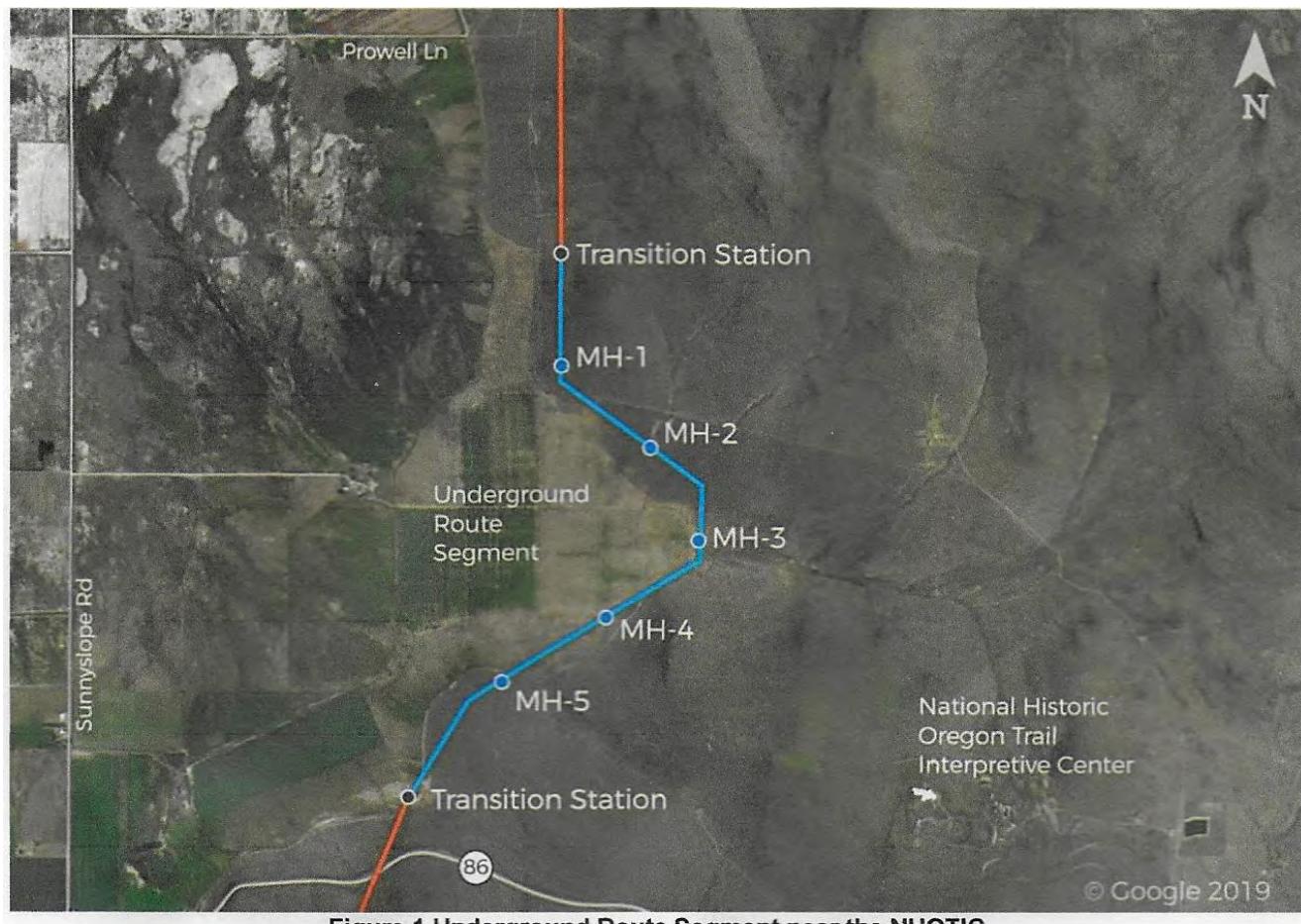


Figure 1 Underground Route Segment near the NHTIC

The 3.7 miles of undergrounding through a major city and its infrastructure cost \$224 million. The 1.80 miles of undergrounding through open land without any obstacles should cost considerably less than a straight proportion of costs. (3.7 = \$224 so 1.80 = \$109) This compares with Power Engineers cost estimate of \$102-\$111.

		<i>Primary Characteristic</i>			<i>Secondary Characteristic</i>	
<i>ESTIMATE CLASS</i>		<i>DEGREE OF PROJECT DEFINITION</i> Expressed as % of complete definition	<i>END USAGE</i> Typical purpose of estimate	<i>METHODOLOGY</i> Typical estimating method	<i>EXPECTED ACCURACY RANGE</i> Typical variation in low and high ranges	
Class 5		0% to 2%	Concept screening	Capacity factored, parametric models, judgment, or analogy	L: -20% to -50% H: +30% to +100%	
Class 4		1% to 15%	Study or feasibility	Equipment factored or parametric models	L: -15% to -30% H: +20% to +50%	
Class 3		10% to 40%	Budget authorization or control	Semi-detailed unit costs with assembly level line items	L: -10% to -20% H: +10% to +30%	
Class 2		30% to 70%	Control or bid/tender	Detailed unit cost with forced detailed take-off	L: -5% to -15% H: +5% to +20%	
Class 1		70% to 100%	Check estimate or bid/tender	Detailed unit cost with detailed take-off	L: -3% to -10% H: +3% to +15%	

The definitions as presented by AACE show the cost estimates used by Idaho Power as presented by Power Engineers Within Exhibit BB Errata Info, cost estimates may be 50% to high.

CLASS 3 ESTIMATE	
<p>Description: Class 3 estimates are generally prepared to form the basis for budget authorization, appropriation, and/or funding. As such, they typically form the initial control estimate against which all actual costs and resources will be monitored. Typically, engineering is from 10% to 40% complete, and would comprise at a minimum the following: process flow diagrams, utility flow diagrams, preliminary piping and instrument diagrams, plot plan, developed layout drawings, and essentially complete engineered process and utility equipment lists.</p> <p>Degree of Project Definition Required: 10% to 40% of full project definition.</p> <p>End Usage: Class 3 estimates are typically prepared to support full project funding requests, and become the first of the project phase control estimates against which all actual costs and resources will be monitored for variations to the budget. They are used as the project budget until replaced by more detailed estimates. In many owner organizations, a Class 3 estimate is often the last estimate required and could very well form the only basis for cost/schedule control.</p>	<p>Estimating Methods Used: Class 3 estimates generally involve more deterministic estimating methods than stochastic methods. They usually involve a high degree of unit cost line items, although these may be at an assembly level of detail rather than individual components. Factoring and other stochastic methods may be used to estimate less-significant areas of the project.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 3 estimates are -10% to -20% on the low side, and +10% to +30% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Budget, scope, sanction, semi-detailed, authorization, preliminary control, concept study, development, basic engineering phase estimate, target estimate.</p>

CLASS 5 ESTIMATE	
<p>Description: Class 5 estimates are generally prepared based on very limited information, and subsequently have wide accuracy ranges. As such, some companies and organizations have elected to determine that due to the inherent inaccuracies, such estimates cannot be classified in a conventional and systemic manner. Class 5 estimates, due to the requirements of end use, may be prepared within a very limited amount of time and with little effort expended—sometimes requiring less than an hour to prepare. Often, little more than proposed plant type, location, and capacity are known at the time of estimate preparation.</p> <p>Degree of Project Definition Required: 0% to 2% of full project definition.</p> <p>End Usage: Class 5 estimates are prepared for any number of strategic business planning purposes, such as but not limited to market studies, assessment of initial viability, evaluation of alternate schemes, project screening, project location studies, evaluation of resource needs and budgeting, long-range capital planning, etc.</p>	<p>Estimating Methods Used: Class 5 estimates generally use stochastic estimating methods such as cost/capacity curves and factors, scale of operations factors, Lang factors, Hand factors, Chilton factors, Peters-Timmerhaus factors, Guthrie factors, and other parametric and modeling techniques.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 5 estimates are -20% to -50% on the low side, and +30% to +100% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Ratio, ballpark, blue sky, seat-of-pants, ROM, idea study, prospect estimate, concession license estimate, guesstimate, rule-of-thumb.</p>

The Council should reject the Conclusion Regarding Undergrounding of the Project (3.4.2) and require a Site Certificate Condition as follows:

Prior to Construction

Prior to construction, the certificate holder shall finalize and submit to the department for its approval, an on-the-ground survey to level 3 Degree of Project Definition as illustrated below:³

³ AACE International Cost Estimate Classifications

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, May 29, 2019 12:24 PM
To: B2H DPOComments * ODOE
Subject: DPO Comment
Attachments: B2H - EFSC letter 3 Fire.docx

Kellen:

Please include the attached comments in response to the DPO for B2H.

Gail Carbiener

May 30, 2019

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

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451
mgccarb@bendbroadband.com

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment.

My comments in this response refer to Public Services Condition 5 (a), specifically the draft Fire Prevention and Suppression Plan as provided in Attachment U-3 and During Operation Public Services Condition 8:

The following comments appear in Attachment U-3 at 1.1 Purpose and 3.1 Operational.

“The risk of fire danger during transmission line construction is related to smoking, refueling activities, operating vehicles and other equipment off roadways, welding activities, and the use of explosive materials and flammable liquids. During operation, the risk of fire is primarily from vehicles and maintenance activities that require welding. Additionally, weather events that affect the transmission line could result in the transmission line igniting a fire.”

It seems to me that Idaho Power and Tetra Tech never researched or consulted officials in any of the California wild fires. Santa Rosa’s Fire Chief, during a forum sponsored by Firehouse which supports first responders, was quoted: “Firefighters responded from 17 states and Australia. 266 Engines, 79 Crews, in addition, over 4,300 law enforcement officers were called in to help with traffic control, evacuations, and other tasks. The California National Guard put 2,300 soldiers on the ground to assist with various tasks.”¹

It is difficult to imagine getting even one-tenth of these resources to Baker City or La Grande. Both of these cities as well as Meacham and Hilgard are at risk. All are in a bowl with winds from the north able to push a fire, downslope through the forest into the city. It is worth noting that the Camp Fire in Paradise was started by the 115-kV Caribou-Palermo transmission line.

¹ Firehouse.com/news - 3/8/2018

Since the Fire Prevention and Suppression Plan is to establish standards and practices to minimize risk of fire ignition and, in the case of fire, provide for immediate suppression, these additional conditions should be included.

Public Services Condition 5: (a.1)

Idaho Power with the concurrence of effected county and city fire districts and the BLM and Forest Service, will develop a “fire-risk map” over the route with a minimum coverage of 20 miles extending from each side from center line of ROW.

Three fire risk zones will be identified using the following definitions:

Zone 1 consists of areas in direct proximity to communities, roads, and utility lines, and represents a direct threat to public safety.

Zone 2 consists of areas where there is an elevated risk for destructive utility-associated wildfires.

Zone 3 consists of all other areas not covered in either Zone 1 or 2.

Public Services Condition 5: (a.2)

In Fire Risk Zone 1, Idaho Power or the Contractor shall provide enhanced fire protection during construction. That will include as a minimum, a 3500 gallon 4x4 water tender, staffed at all times with two personnel. Period includes all times that either the BLM or Forest Service declare fire season for adjoining properties. The tender will remain staffed during construction working hours.

Public Services Condition 5: d.

Prior to energizing the transmission line for operation, Idaho Power will install high-definition cameras that cover Zones 1 and 2. These cameras should be similar to those installed by ALERTWildfire.²

² ALERTWildfire is a consortium of three universities -- The University of Nevada, Reno (UNR), University of California San Diego (UCSD), and the University of Oregon (UO) -- providing access to state-of-the-art Pan-Tilt-Zoom (PTZ) fire cameras and associated tools to help firefighters and first responders: (1) discover/locate/confirm fire ignition, (2) quickly scale fire resources up or down appropriately, (3) monitor fire behavior through containment, (4) during firestorms, help evacuations through enhanced situational awareness, and (5) ensure contained fires are monitored appropriately through their demise.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Thursday, June 6, 2019 7:48 AM
To: B2H DPOComments * ODOE
Subject: response - Fire
Attachments: B2H - EFSC letter 3 Fire.docx

Please accept the attached response to the DPO section on Fire.
Gail Carbiener

June 6, 2019

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

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451
mcgccarb@bendbroadband.com

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment.

I do not believe that Exhibit U, Public Services; 2.1 General Standards for Siting Facilities, especially Police and Fire Protection 3.4.6.2 Fire and errata additions, have been met.

The “Fire Prevention and Suppression Plan” dated September 2018 in paragraph 1.1 Purpose states: “The risk of fire danger during transmission line construction is related to smoking, refueling activities, operating vehicles and other equipment off roadways, welding activities, and the use of explosive materials and flammable liquids. During operation, the risk of fire is primarily from vehicles and maintenance activities that require welding. Additionally, weather events that affect the transmission line could result in the transmission line igniting a fire.”

This Fire Plan is weak, reactive and lacks adequate prevention. Idaho Power does not describe the significance of a 500-kV line compared to other high voltage lines for potential fires. The Fire Plan obviously is the least costly attempt at compliance.

It seems to me that Idaho Power has never researched or consulted officials in any of the California wild fires. Santa Rosa’s Fire Chief was quoted: “Firefighters responded from 17 states and Australia. 266 Engines, 79 Crews, in addition, over 4,300 law enforcement officers were called in to help with traffic control, evacuations, and other tasks. The California National Guard put 2,300 soldiers on the ground to assist with various tasks.”¹

It is difficult to imagine getting even one-tenth of these resources to Baker City or La Grande. Both of these cities as well as Meacham and Hilgard are at risk. All are in a bowl with winds from the north able to push a fire, downslope through the forest into the city. It is worth noting that the Camp Fire in Paradise was started by the 115-kV Caribou-Palermo transmission line.

¹ [Firehouse.com/news - 3/8/2018](http://www.firehouse.com/news/2018/08/08/the-camp-fire-in-paradise-was-started-by-the-115kv-caribou-palermo-transmission-line/)

The Fire Prevention and Suppression Plan is inadequate to minimize risk of fire ignition and, in the case of fire, provide for immediate suppression. These additional conditions should be included.

Additional Condition #1:

FIRE PREVENTION MEASURES 2.0

2.0.5 Equipment:

Idaho Power or the Contractor during construction, shall provide enhanced fire protection. This will include a four-wheel drive fire engine that is designed for rapid deployment. For example, a “Type 3 fire engine” which typically includes a pump operating at 120 gpm, a large 500 gal/tank, 1000 ft. 1 1/2” hose. A minimum crew of two will be present during all hours of construction, including equipment servicing and maintenance.

[This replaces the “Watchman” which is totally inadequate fire prevention and protection]

Additional Condition #2:

2.0 Restricted Operations:

The Contractor and IPC will restrict or cease operations in specified locations during periods of high fire danger at the direction of the land-management agency's closure order. Restrictions may vary from stopping certain operations at a given time to stopping all operations. IPC may obtain approval to continue some or all operations if acceptable precautions are implemented.

[add] IPC will notify fire agencies responsible for work locations, when approval is obtained from land-management agencies.

OPERATION AND MAINTENANCE 3.0

IPC states at 3.1; “During transmission line operation, the risk of fire danger is minimal. The primary causes of fire on the ROW result from unauthorized entry by individuals for recreational purposes and from fires started outside the ROW.”

Pacific Gas & Electric’s statistics on wildfire causes from 2015-2017² show:

Vegetation (49%) Tree, tree limb, or other vegetation contact with conductors that result in fire ignition.

Equipment Failure – Conductor/Hardware (28%) Failure of conductor resulting in wire down and fire ignition.

Third-Party Contact (13%) Contact caused by a third party, leading to fire ignition, such as cars hitting poles and Mylar balloon contacts.

Animal (8%) Animal contacts that result in fire ignition, such as birds contacting energized conductors then falling to the ground and causing an ignition.

Unknown (2%) Situations where PG&E was unable to determine the cause of the ignition.

The majority of fires will start and burn for some time before being discovered and reported. Three additional preventive conditions are recommended. Condition #5 is particularly important because IPC is not near or has quick access to the transmission line.

² PG&E amended Wildfire Safety Plan

Additional Condition #3:

Wildfire evacuation plan:

IPC should partner with willing counties and cities and a traffic and evacuation expert, to determine anticipated traffic conditions and evacuation times and recommend strategies that could be used.

Additional Condition #4:

Camera Deployment

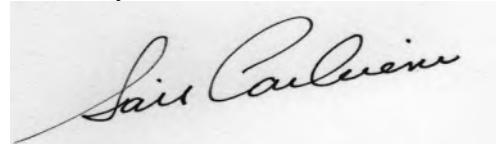
Prior to energizing the transmission line for operation, Idaho Power will install high-definition cameras that cover fire-threat areas where there is an extreme risk (including likelihood and potential impacts on people and property). Areas to be covered by cameras will be determined by IPC and appropriate fire-control authorities. These cameras should be similar to those installed by ALERTWildfire.³

Additional Condition #5:

When the following weather conditions are predicted, IPC will send a qualified crew to predetermined sites to determine if the line should be turned off.

- A Red Flag Warning declared by the National Weather Service
- Humidity levels predicted below 20%
- Forecasted sustained winds predicted above 25 mph and wind gusts in excess of 45 mph

Sincerely

A handwritten signature in black ink, appearing to read "Gail Carbiener".

Gail Carbiener

³ ALERTWildfire is a consortium of three universities -- The University of Nevada, Reno (UNR), University of California San Diego (UCSD), and the University of Oregon (UO) -- providing access to state-of-the-art Pan-Tilt-Zoom (PTZ) fire cameras and associated tools to help firefighters and first responders: (1) discover/locate/confirm fire ignition, (2) quickly scale fire resources up or down appropriately, (3) monitor fire behavior through containment, (4) during firestorms, help evacuations through enhanced situational awareness, and (5) ensure contained fires are monitored appropriately through their demise.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcccarb@bendbroadband.com>
Sent: Saturday, June 8, 2019 11:50 AM
To: B2H DPOComments * ODOE
Subject: Retirement
Attachments: B2H - EFSC letter 4 Retirement.docx

Kellen:
Please accept this response to the DPO.

Gail Carbiener

June 8, 2019

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

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment and object.

In eastern Oregon there are no 500-kV transmission lines. B2H is very large, sometimes three times the size of current lines in the area.

Exhibit W Retirement, 3.1 Estimated Useful Life:

Idaho Power claims that the transmission line will remain in service for perpetuity. There are no references or hard data to support this optimistic estimate. In fact, 500-kV long distance transmission lines were first built in the 1960s. This same argument is being used for the “Sams Valley Reinforcement Projects” by PacifiCorp. Over the last 50 years, wind power, solar power, local distributed energy, including new battery storage will certainly affect long distance transmission lines. Cancellation of 500-kV projects such as Cascade Crossing and Colusa-Sutter in California, are specific illustrations of changes being made by forward thinking executives.

Exhibit W Retirement, 3.2 Site Restoration Activities:

On page W-3, IPC is required to “remove foundations for each support structure to a depth of one (1) foot below grade, depending on ground slope.” There will be over 4400 cement foundations, most at four feet

diameter, but some up to eight feet in diameter. Regrowth of native grasses, shrubs and trees will require more than one foot of soil.

The requirement of one foot has been used on other energy facilities, but B2H is much larger than any other facilities constructed to date in eastern Oregon. IPC does not say how they will remove the reinforced concrete, but mechanical equipment will certainly leave cement chunks in the ground to be covered with some top soil. Weather erosion will soon show the remaining rebars and foundation.



ADDED CONDITION #1: Foundations will be removed to depth of three feet below grade.

Exhibit W Retirement and Financial Assurance Condition 1: This formula of required bonding will leave the public exposed to risk of returning the lands to preconstruction condition. Most damage will be done in the early stages of construction, such as ground disturbance for roads and right-of-way and foundation preparation. In (d.) bond or letter of credit amendments should be based upon qualified appraisal.

ADDED CONDITION #2: IPC will contract with a qualified construction appraiser to determine amount of construction completed at each six (6) month period. This amount will be used for bond or letter of credit adjustment if the amount is equal or more than \$250,000 from straight line formula.

Exhibit W Retirement and Financial Assurance Condition 2: A bond or letter of credit purpose, is to protect the public from the RISK of not having the site restored to a useful non-hazardous condition. EFSC is recommending that the Council approve the assumption that the risk to the public is ZERO (0) for 50 years, then remain under-insured for the next 50 years. If EFSC and IPC feel that the risk is zero, then the cost of the bond should be low. The risk should be moved to the bank, not forced upon the public. The fact that it may have an operating life of 100 years does not remove the risk that it is there and would need removal and ROW recondition.

ADDED CONDITION #3: On the date that the facility is placed in service, the bond or letter of credit will be set at the final appraised amount of restoration. This amount will be adjusted, by qualified appraisal, at least every 5 years.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, July 24, 2019 5:22 PM
To: B2H DPOComments * ODOE
Subject: DPO comments
Attachments: B2H - EFSC letter 1a Underground #2.docx

Kellen:

A second response for undergrounding.

Thank you
Gail Carbiener

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

July 24, 2019

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451

To: Chairmen Beyeler and Members of the Council

Idaho Power has used inflated costs to describe undergrounding for approximately two miles in front of the Oregon Trail Interpretive Center near Baker City. In addition, it is stated that ground disturbance will be more than overhead lines, however, most ground disturbance will be temporary and the transition stations will cover about 2 acres each. Most of the underground route is not on side hills, but can be placed at the toe of the hill, with most hills not more than 10% grade for half the corridor. None of the undergrounding will be on cultivated lands. Directional Drilling, for 1000 feet, will be recommended so the final exit and transition station will be on Baker County land not private lands. Splices will be required to connect the multiple sections of cable, and splicing vaults will be placed approximately every 1500 feet and covered with several feet of soil.

I have included pictures taken July 21, 2019 of the Southern California Edison's 500-kV underground line in Chino Hills.



The picture above shows a splicing vault with the manholes that are near ground level. Constructing B2H with only temporary ground disturbance, following the current 230 line, and needing only one splice vault, the route is 80% flat. Certainly, this needs to be considered.

The powerline comes over the hill and goes underground through the golf course. Cattle could graze on the hill.



The picture below, shows the transition station, built to the left for expansion and totaling approximately 2 acres.



Power Engineers provided a cost estimate at the AACE Level 5 for 1.5 miles. Class 5 estimates are generally prepared based on very limited information, and subsequently have wide accuracy ranges. As such, some companies and organizations have elected to determine that due to the inherent inaccuracies, such estimates cannot be classified in a conventional and systematic manner. Class 5 estimates, due to the requirements of end use, may be prepared within a very limited amount of time and with little effort expended—sometimes requiring less than an hour to prepare.¹

Power Engineers were involved with the Southern California Edison Chino Hills underground 500-kV power line so should be asked to provide a Class 3 Cost Estimate using the AACE guidelines. This will provide an accurate cost estimate for the total of two-miles.

Class 3 estimates are typically prepared to support full project funding requests, and become the first of the project phase control estimates against which all actual costs and resources will be monitored for variations to the budget. They are used as the project budget until replaced by more detailed estimates.²

The Chino Hills project crossed two major thoroughfares, several minor roadways, a shopping center, two flood-control channels and two holes of a golf course. One-third of the alignment was on a 15 percent average grade, with slopes as steep as 35 percent in some locations. In all, the project involved the installation of approximately 17,000 linear feet of duct bank and numerous horizontal drills ranging from 800 to 2,100 feet in length.³

Power Engineers in Errata BB, additions to Complete Application, have estimated that 1.5 miles of undergrounding will cost between \$102 and \$111 million. According to the article Out of Sight Out of Mind this estimate is grossly overestimated.⁴

Using Mr. Hall's updated Edison Electric Institute calculations, the 2-mile underground new construction is more likely to be \$67 to \$70 million.

I do not agree with **3.4.2 Conclusion Regarding Undergrounding of the Project:**
..... because of the high cost of an underground line compared to overhead 500-kV lines, unproven technology over long distances for 500-kV, reliability and reactive compensation issues for long installations, and increased land disturbance, the alternative of placing the 500-kV line underground was not considered feasible for the Project.

Therefore, the Energy Facilities Siting Council should require a condition in the proposed order that requires an AACE Cost Estimate at the Level 3 be presented and approved by EFSC prior to construction.

¹ www.aacei.org

² www.aacei.org

³ Underground construction magazine 5/7/2017

⁴ ***Out of Sight, Out of Mind***, 2012: An Updated Study on the Undergrounding of Overhead Power Lines, Prepared by: Kenneth L. Hall, P.E. Hall Energy Consulting, Inc.; Prepared for: Edison Electric Institute January 2013

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Saturday, August 10, 2019 3:13 PM
To: B2H DPOComments * ODOE
Subject: B2H Draft Proposed Order
Attachments: B2H - Letter 8.docx

Kellen:

Please accept my final response to the B2H Draft Proposed Order.

best
Gail Carbiener

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

August 10, 2019

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR 97701-7927
(541) 312-1451

To: Chairman Beyeler and Members of the Council

Thank you again for the opportunity to comment on the Draft Project Order for B2H. I look forward to the opportunity of comment in person.

After reading thousands and thousands of document pages, and attempting to understand all the rules and regulations, I have submitted several responses. However, it is clear Idaho Power will have a significant number of "final" plans that will be submitted after the August 22, 2019 comment closing date. These include Fire Protection, Vegetation, Geotechnical, Blasting, Scenic, Noise and others.

A perfect example of one of these is: Public Services Condition 2: Prior to construction, the site certificate holder shall submit to the department for its approval a Helicopter Use Plan, which identifies or provides: a. The type of helicopters to be used (all helicopters must be compliant with the noise certification and noise level limits set forth in 14 C.F.R. § 36.11); b. The duration of helicopter use; c. Roads or residences over which external loads will be carried; d. Multi-use areas and light-duty fly yards containing helipads shall be located: (i) in areas free from tall agricultural crops and livestock; (ii) at least 500 feet from organic agricultural operations; and (iii) at least 500 feet from existing dwellings on adjacent properties; and e. Flights shall occur only between sunrise and sunset.

Another example is: Public Services Condition 3: Prior to construction, the certificate holder shall finalize, and submit to the department for its approval, a final Fire Prevention and Suppression Plan.

Another: A list of streams including name, size, location, stream type, and RMA width will be provided in IPC's final Plan for an Alternate Practice prior to initiation of harvest activities. Prior to activity within 100 feet of type F or D streams, IPC will submit a written plan in accordance with OAR 629-605-0170.

These and other activities, not made public until after the closing of comment period, are vital public concerns. Myself, and others have responded to what is currently available from Idaho Power, but will those details change in the Final Plan?

The Siting Council should consider an Amended Draft Proposed Order and require Final Plans. Confidential data can be redacted.

Thank you

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Monday, August 19, 2019 5:23 PM
To: B2H DPOComments * ODOE
Subject: response to DPO
Attachments: B2H - Letter A.docx

Kellen:

After reading the RAI and IPC responses, I submit these additional comments.

best
Gail Carbiener

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

August 19, 2019

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451
mcgccarb@bendbroadband.com

Subject: Idaho Power Application for a Site Certificate.

Chair Beyeler and Members of the Council:

Please accept these final comments on the B2H power line project. I appreciate the opportunity and look forward to presenting in person.

Amended Site Certificate, page U-25

Page U-25 states, "Construction workers and maintenance personnel are not trained firefighters and are not expected to fight fires. However, qualified equipment operators, at the direction of Incident Command, may use construction equipment to assist local firefighting efforts when safe to do so." Idaho Power states: Page U-25 is revised in the Exhibit U Errata to include the following text: In the event of a fire, the Incident Management Team may request local assistance in fire fighting, if personnel have required training including the use construction equipment on the Project site. (emphasis by Carbiener)

Idaho Power continues to ignore the factor of time. Incident Management Teams are called in after the fire is beyond control of local personal, in this case the contractor and local fire districts. Local districts are responsible for relatively small areas, and the contractor does not have fire fighting as the top priority.

Idaho Power continues to under-estimate the potential for fire and the possibility of loss of property and life. The response confirms my previous recommendation, which improves the day to day fire protection from the multiple districts and provides "on-site" protection.

Idaho Power or the Contractor during construction, shall provide enhanced fire protection. This will include a four-wheel drive fire engine that is designed for rapid deployment. For example, a "Type 3 fire engine" which typically includes a pump operating at 120 gpm, a large 500 gal/tank, 1000 ft. 1 1/2" hose. A minimum crew of two will be present during all hours of construction, including equipment servicing and maintenance.

Exhibit N: Need.

It is important to know that Idaho Power's 2019 Integrated Resource Plan has been presented and then postponed until October 31, 2019. If significant changes are made to the 2019 Plan from the 2015 Plan, that has been relied upon by EFSC Staff, some Exhibits may need revision. Exhibits A, D, M, U, and W will be affected by different assumptions. For example, financial responsibility if a participant drops out, or if the Oregon Public Utilities Commission enacts wildfire regulations.

I recommend that EFSC revisit the need for the B2H.

Exhibit S – Cultural Resources; Section 3.4.1

Idaho Power stated that resources that could not yet be properly evaluated are recommended as unevaluated but are treated as NRHP-eligible for the purposes of analysis. A specific segment of the Oregon Trail was presented to the State Advisory Committee on Historic Preservation on February 22, 2019. The following motion was made:

Oregon Trail: La Grande to Hilgard Segment

Ms. Trice moved to forward the nomination to the Keeper of the National Register under Criterion A with amendments as recommended by the committee. Ms. Oberst seconded. The motion passed unanimously.

The boundary of the nominated segment extends 250 feet on either side of the centerline of the Oregon Trail or to the margin of private property if the distance is less than 250 feet. The total distance of the nominated trail segment is 3.66 miles. Oregon Trail is within Section 7 T3S R38E, and Section 12 T3S R37E and in Section 10 T3S R37.

This segment is all on private property and is within 150 feet of the center line of the ROW for B2H. This segment should be noted prior to construction.

Thank you
Gail Carbiener

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 $\frac{1}{4}$ 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.

Sandra K. Carlson Sandra K. Carlson
Signature Printed Name
✓

Mailing Address:

P.O. Box 177
Cove, OR 97824

Carroll
P.O. Box 527
La Grande, OR
97350



Oregon Energy Policy Setting Council

Yo Kellen Tackenswalter, Senior Setting Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR
97301

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

97301-2552 0009

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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I doubt it was extensive because it is entirely 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) 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.

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 a 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 address in a separate comment.



Signature

Name: *David CARROLL*

Address: *P.O. Box 567
LaGrande, OR
97850*

F. Carroll
701 N Avenue
La Grande, OR 97850



Energy Facilities Siting Council
of Oregon
Tardae Weher, Dr. Siting Analyst
OR Dept of Energy
550 Capitol St. NE
Salem, OR 97301

RECEIVED
AUG 19 2019

DEPARTMENT OF ENERGY

97301-374299

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:

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,

Terri Carroll

Name: Terri Carroll

Address: 701 M Avenue
La Grande, OR. 97850

12 August 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:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within $\frac{1}{2}$ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.

Verna W Carroll
(Signature)

Name: Verna W Carroll
Address 1602 First Street
La Grande, OR 97850

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protection services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,

Jenilyn A. Carter

Name Jenilyn A. Carter
Address 1803 Linda Lane
LaGrande, Or. 97850

*Don't put our lives, homes and community at risk
by building this transmission line so close to
our homes!.*

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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I dou it was extensive because it is entirely 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.

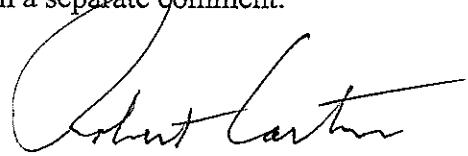
Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it's difficult to believe “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 a 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

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 a 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: ROBERT CARTER

Address: 1803 Linda Lane
La Grande, OR 97850

PS

The B2H powerline will be a permanent visual blight on the entire city of LaGrande. If this powerline is required, bury it underground through Union County !!

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 U2⁹ from the application shows an “Aerial Lift Crane to be Used During Construction” and the Transportation and Traffic Plan on page 19¹⁰ 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
Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

City of La Grande Ordinance Number 3242,
Series 2018
Page 236 of 312

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

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

²The 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.

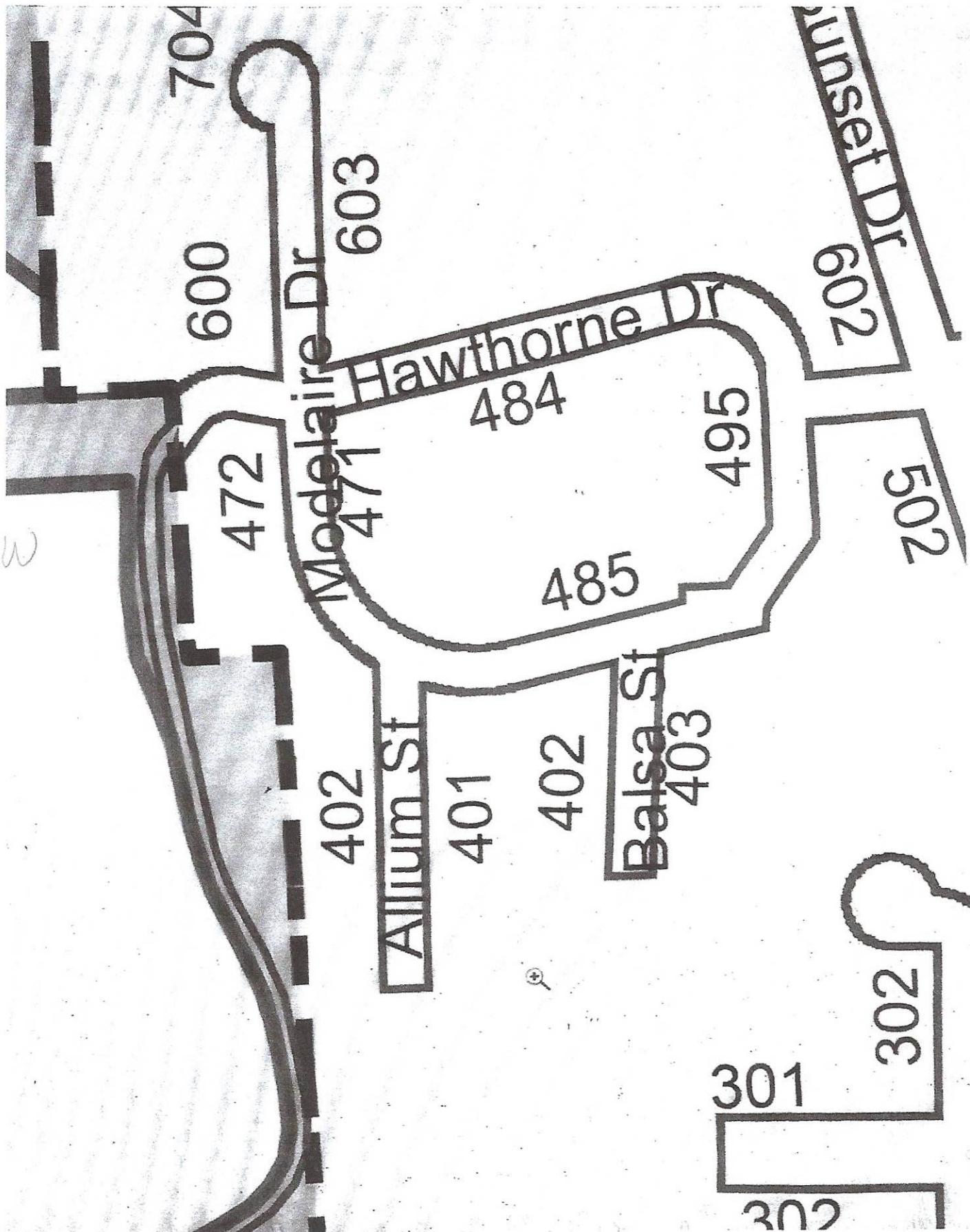
Local Streets: Two (2) travel lanes, parking on one (1) side of street.

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.

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

⁴Bike 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.



Public Services

Exhibit 3

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.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H ApASC

Compiled by ODOE, RA's from the City of La Grande and Responses from IPC

U	U-Public Services	<p>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 for the construction requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.</p>	<p>proposed helipad is a necessary supporting facility.</p> <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>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.</p> <p>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</p> <p>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</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>

103

IV. CONCLUSIONS

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

106

107

V. ORDER AND CONDITIONS OF APPROVAL

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

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

118

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

132

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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

145

146 s:\planning\land use applications\conditional use permits\2016\02-cup-16 grh-sunset\02-cup-16 decision order.docx



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

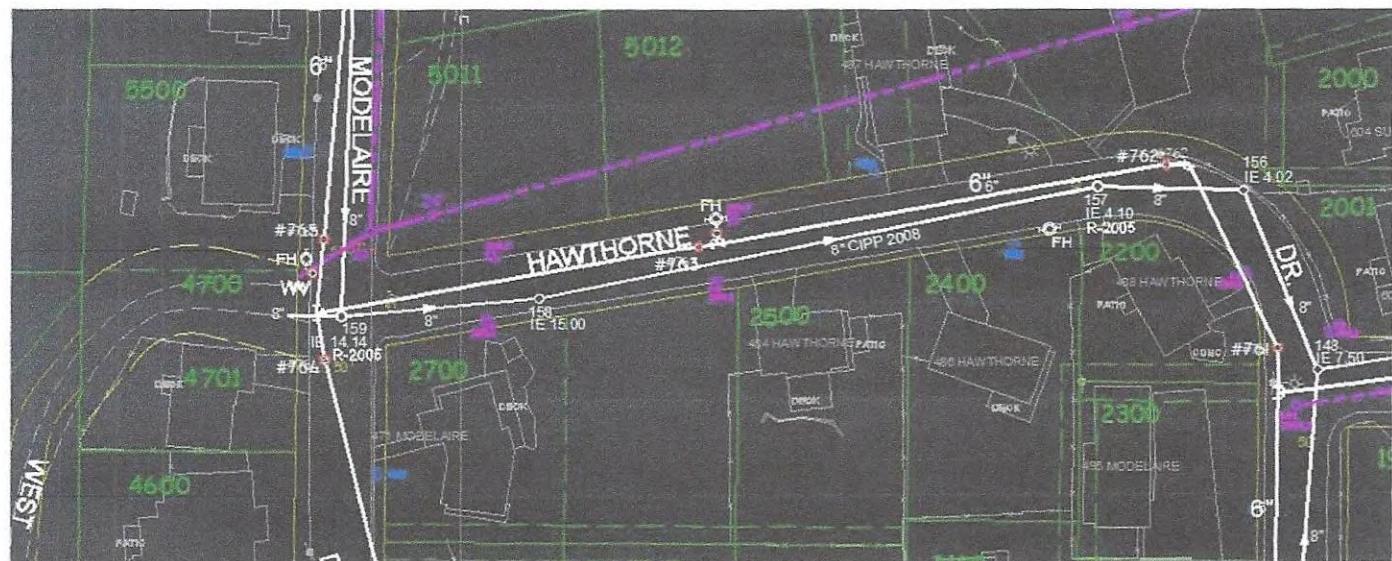
2 attachments



Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

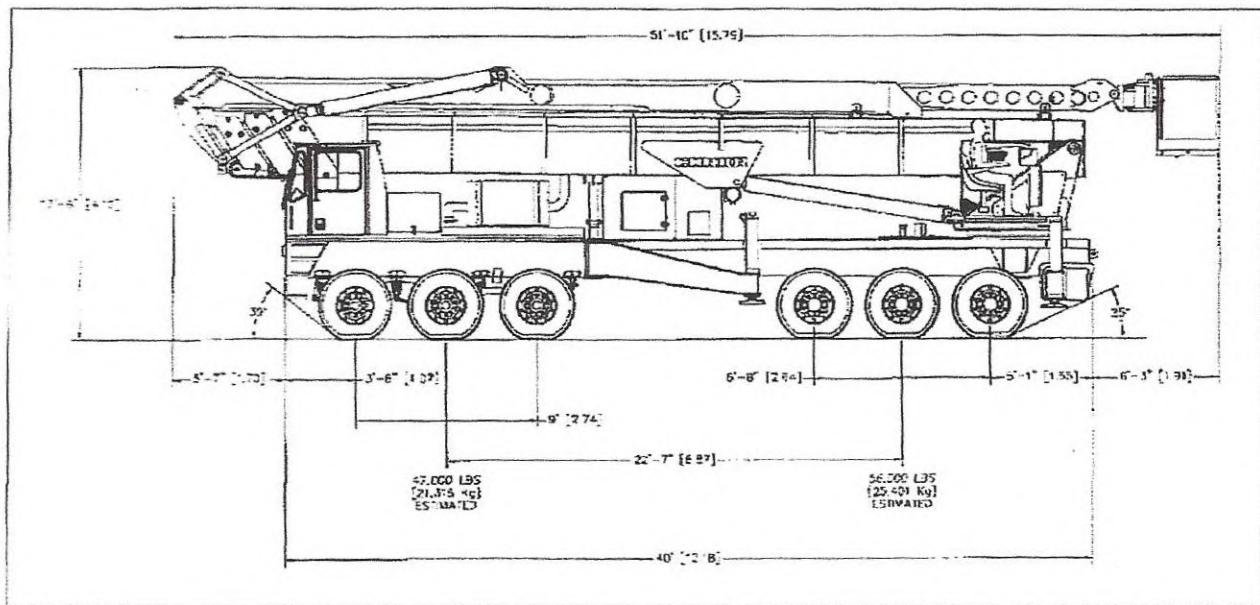


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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-

City of La Grande Ordinance Number 3242,
Series 2018
Page 252 of 312

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

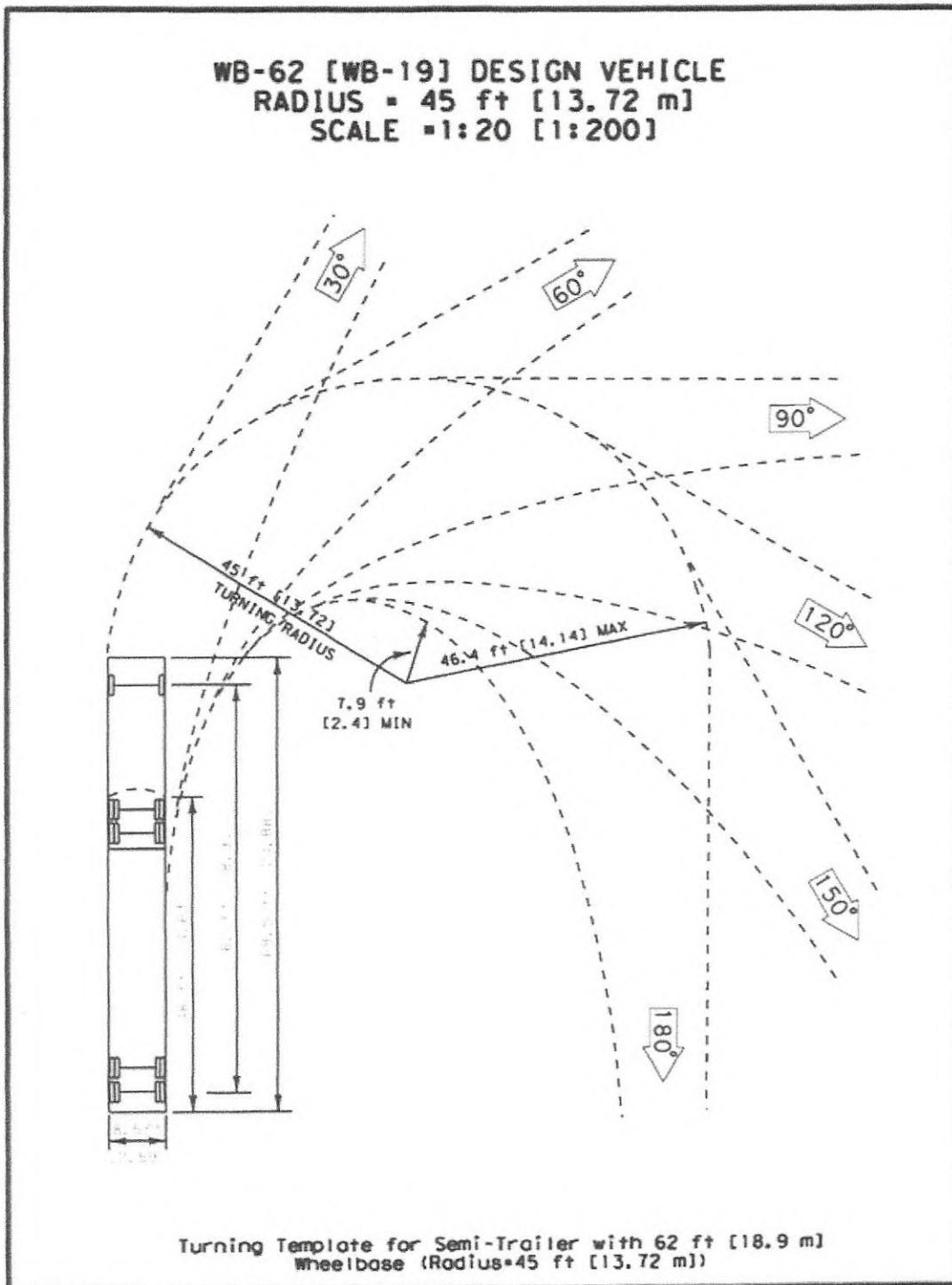
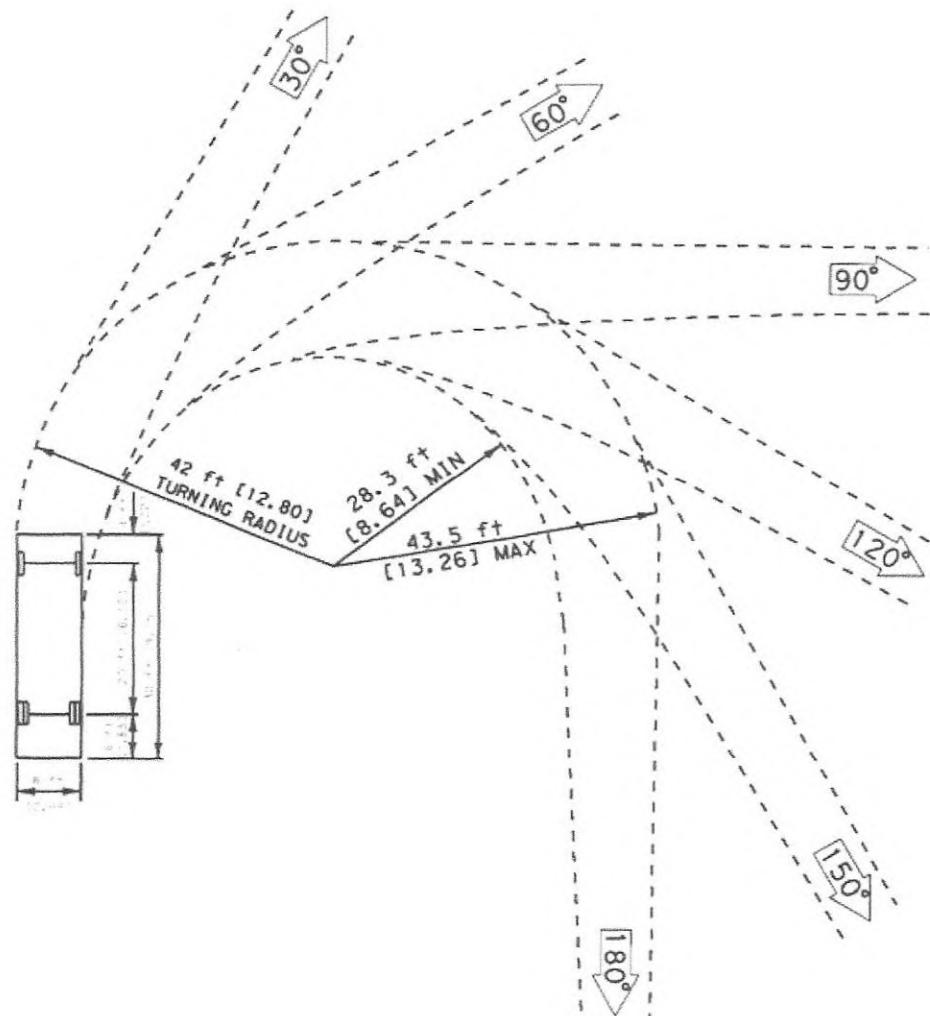


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

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

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

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. Howe II

ADDRESS 482 Modelaire Dr

EMAIL jhowell2@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 475 MODELAIRe DR.

EMAIL bdwaldrop58@gmail.com

SIGNATURE

PRINTED NAME EUSE McILWAIN

ADDRESS 476 MODELAIRe DR.

EMAIL milmil.euse@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

Jessie Huxoll

ADDRESS

472 Modelaire Dr. LaGrande OR 97851

EMAIL

jessiehuxoll@live.com

SIGNATURE

PRINTED NAME

C. Huxoll

ADDRESS

472 Modelaire Dr. LaGrande OR 97851

EMAIL

CHRIS.HUXOLL@EMXEL.COM

SIGNATURE

PRINTED NAME

Jonah Lindeman

ADDRESS

702 Modelaire LaGrande

EMAIL

j.lindeman@rpi.ag

SIGNATURE

PRINTED NAME

Marie Skinner

ADDRESS

208 3rd LaGrande

EMAIL

marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

Blake Bars

ADDRESS

1101 G Ave La Grande

EMAIL

blakebars@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

D. Dale Momman

PRINTED NAME

D. Dale momman

ADDRESS

405 Balsa, La Grande, Or

EMAIL

d momman @ eoni.com

SIGNATURE

Jim K

PRINTED NAME

Jim Kieider

ADDRESS

60346 Marvin Rd
La Grande, OR 97850

EMAIL

jkieider@campblackdog.org

SIGNATURE

Joydie Arritola

PRINTED NAME

JUDIE ARRITOLA

ADDRESS

603 Modelaire LaGrande, Or

EMAIL

Jtola@charter.net

SIGNATURE

Pasco Arritola

PRINTED NAME

Pasco Arritola

ADDRESS

603 Modelaire LaGrande, OR

EMAIL

Pstola @ charter.net

SIGNATURE

John Garlitz

PRINTED NAME

JOHN GARLITZ

ADDRESS

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.

SIGNATURE

PRINTED NAME

Andrea Galzow

ADDRESS

486 Hawthorne DR, LA Grande

EMAIL

foreverfamily33@aol.com

SIGNATURE

PRINTED NAME

Frances E. Lillard

ADDRESS

477 Modelaire Dr. B

EMAIL

SIGNATURE

PRINTED NAME

Brent H. Smith

ADDRESS

410 Allium St

EMAIL

smith.brent@gmail.com

SIGNATURE

PRINTED NAME

M. Jeannette Smith

ADDRESS

410 Allium Street

EMAIL

jeannetteramfon@gmail.com

SIGNATURE

PRINTED NAME

KIMBERLEY HEITSTUMAN

ADDRESS

2409 CENTURY LP, LA GRANDE, OR 97850

EMAIL

Kimheitstuman@hotmail.com

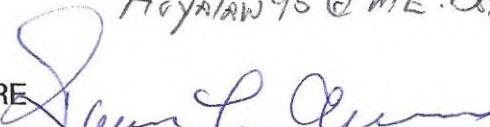
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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 2909 C.M. Ave,

EMAIL Hoytaw95@ME.com

SIGNATURE 

PRINTED NAME

ADDRESS Connie L. Allen 541-9637720

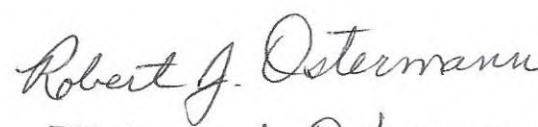
EMAIL 410 Balsa Street La Grande, Oregon 97858
N/A

SIGNATURE 

PRINTED NAME Linda M. Snyder

ADDRESS 491 Modelaire

EMAIL

SIGNATURE 

PRINTED NAME Robert J. Ostermann

ADDRESS 495 Modelaire Dr. La Grande, OR 97850

EMAIL

SIGNATURE 

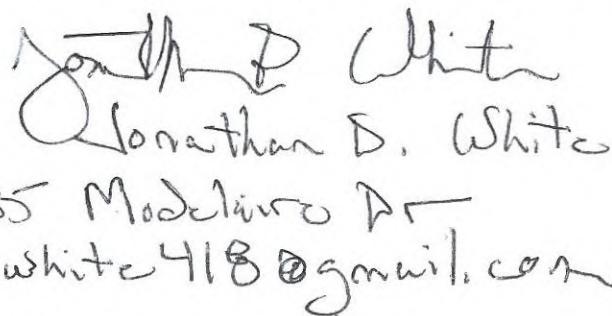
PRINTED NAME Robin J. Ostermann

ADDRESS 495 Modelaire Dr. La Grande, 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.

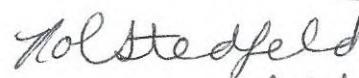
SIGNATURE


Jonathan D. White

PRINTED NAME

ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

SIGNATURE


Robin Stedfeld

PRINTED NAME

ADDRESS 485 Modelaire Dr. La Grande
EMAIL r.stedfeld@yahoo.com

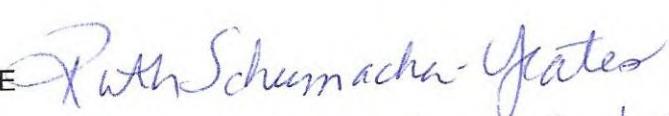
SIGNATURE


Rita Allen

PRINTED NAME

ADDRESS 410 Balsa St. La Grande Or.
EMAIL

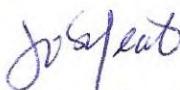
SIGNATURE


Ruth Schumacher Yeates

PRINTED NAME

ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

SIGNATURE


JOHN YEATES

PRINTED NAME

ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

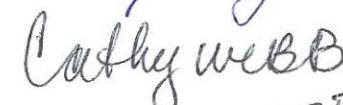
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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

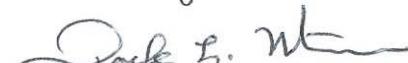
EMAIL loisbarry31@gmail.com

SIGNATURE 

PRINTED NAME CATHY WEBB

ADDRESS 1708 Cedar St. LAGRANGE, OR 97850

EMAIL hunkski@gmail.com

SIGNATURE 

PRINTED NAME Jack L. Martin

ADDRESS 1412 Gilcrest Dr. LaGrande

EMAIL BuffMartin27@Gmail.com

SIGNATURE 

PRINTED NAME GERALDINE BRASETH-PALMER

ADDRESS 1602 Gilcrest DRIVE LA GRANDE, ORE 97850

EMAIL -

SIGNATURE 

PRINTED NAME Jean RAph

ADDRESS 1509 MADISON AVE LaGrande, OR 97850

EMAIL Jraph19@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 Cay Sexton

ADDRESS 401 Balsa Street LaGrande OR 97850

EMAIL caytris@gmail.com

SIGNATURE 

PRINTED NAME Melinda McGowan

ADDRESS 602 Sunset Dr.

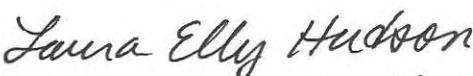
EMAIL melindamcgowan@gmail.com

SIGNATURE 

PRINTED NAME Keith D. Hudson

ADDRESS 605 F Ave, LaGrande OR 97850

EMAIL keith.hudson@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 *Gary D. Pierson*

PRINTED NAME *Gary D. Pierson*

ADDRESS *489 Modelaire Drive, La Grande OR 97850*

EMAIL *-*

SIGNATURE *Lynn Wheeler Duncan*

PRINTED NAME *LYNN WHEELER DUNCAN*

ADDRESS *489 Modelaire Drive, La Grande OR 97850*

EMAIL *v1wd1910@gmail.com*

SIGNATURE *Anne G. Cavinato*

PRINTED NAME *Anne G. Cavinato*

ADDRESS *86 Hawthorne Dr. La Grande, OR 97850*

EMAIL *acavinato@eou.edu*

SIGNATURE *Joe Horst*

PRINTED NAME *JOE HORST*

ADDRESS *86 HAWTHORNE DR. LA GRANDE OR.*

EMAIL *joehorst@eoni.com*

SIGNATURE *Angela Sherer*

PRINTED NAME *ANGELA Sherer*

ADDRESS *91 N. 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



PRINTED NAME Robert J. Sherer

ADDRESS 97 W Hawthorne Dr, LaGrande, OR 97850

EMAIL asherer@frontier.com

SIGNATURE Heather M. Null

PRINTED NAME Heather M. Null

ADDRESS 492 Modelaire Dr. La Grande, OR 97850

EMAIL hnull@eoni.com

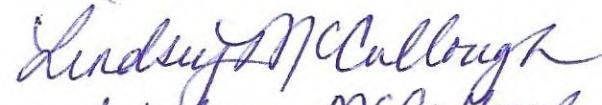
SIGNATURE Bert R. Frewing

PRINTED NAME Bert R. Frewing

ADDRESS 709 South 12th Street LaGrande, OR 97855

EMAIL jeanfrewing@gmail.com

SIGNATURE



PRINTED NAME Lindsey McCullough

ADDRESS 404 Balsa St., La Grande, OR 97850

EMAIL lindz_mm91@hotmail.com

SIGNATURE

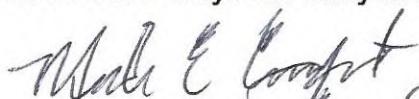
PRINTED NAME

ADDRESS

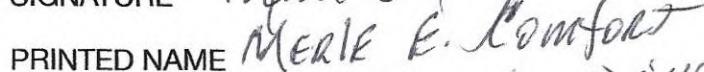
EMAIL

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.

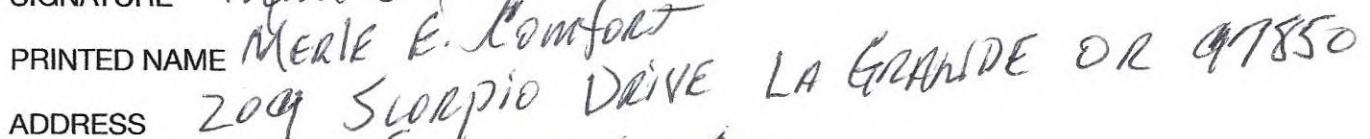
SIGNATURE



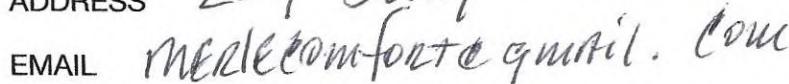
PRINTED NAME



ADDRESS



EMAIL



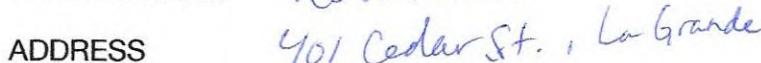
SIGNATURE



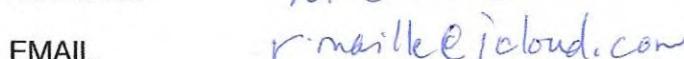
PRINTED NAME



ADDRESS



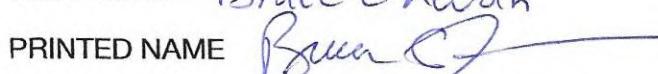
EMAIL



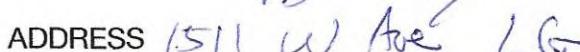
SIGNATURE



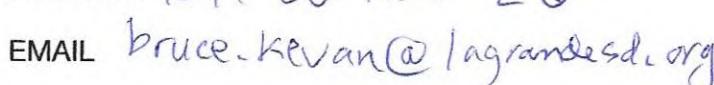
PRINTED NAME



ADDRESS



EMAIL



SIGNATURE



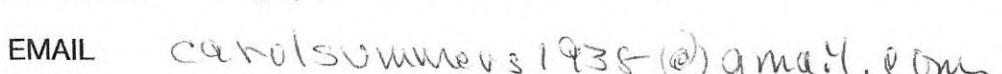
PRINTED NAME



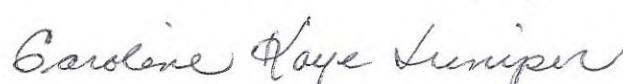
ADDRESS



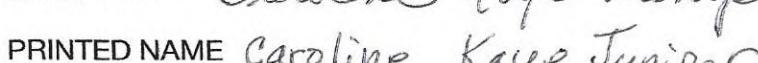
EMAIL



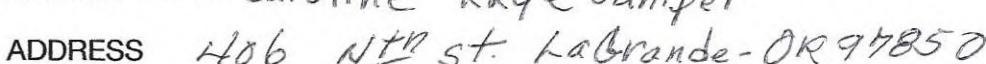
SIGNATURE



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 *Gerald D. Juniper*

PRINTED NAME *Gerald Darwin Juniper*

ADDRESS *406 4th St. LaGrande OR 97850*

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 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

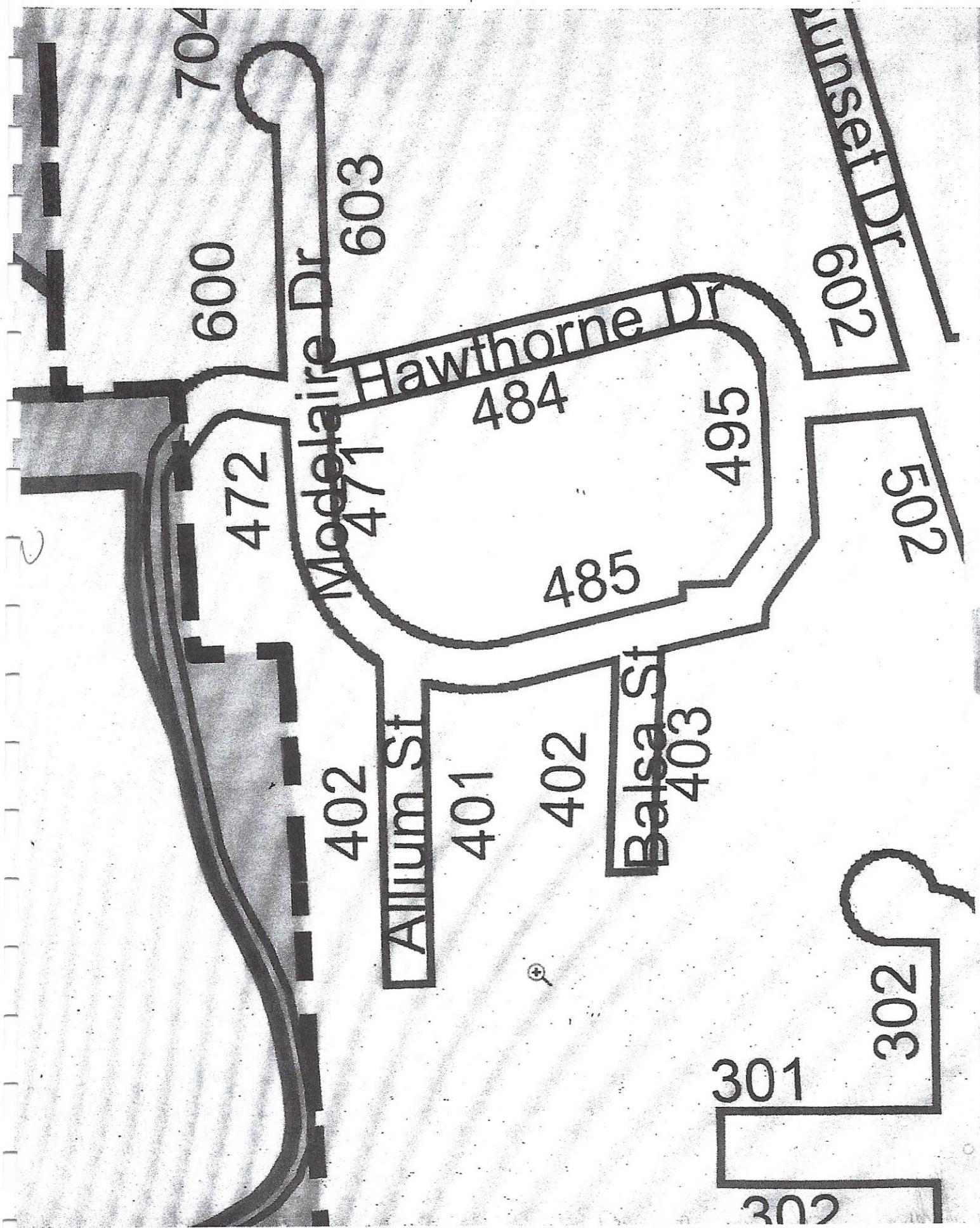
For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation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

Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com



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.



Department of Environmental Quality

[OARD Home](#)[Search Current Rules](#)[Search Filings](#)[Access the Oregon Bulletin](#)[Access the Annual Compilation](#)[FAQ](#)[Rules Coordinator / Rules Writer Login](#)

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;

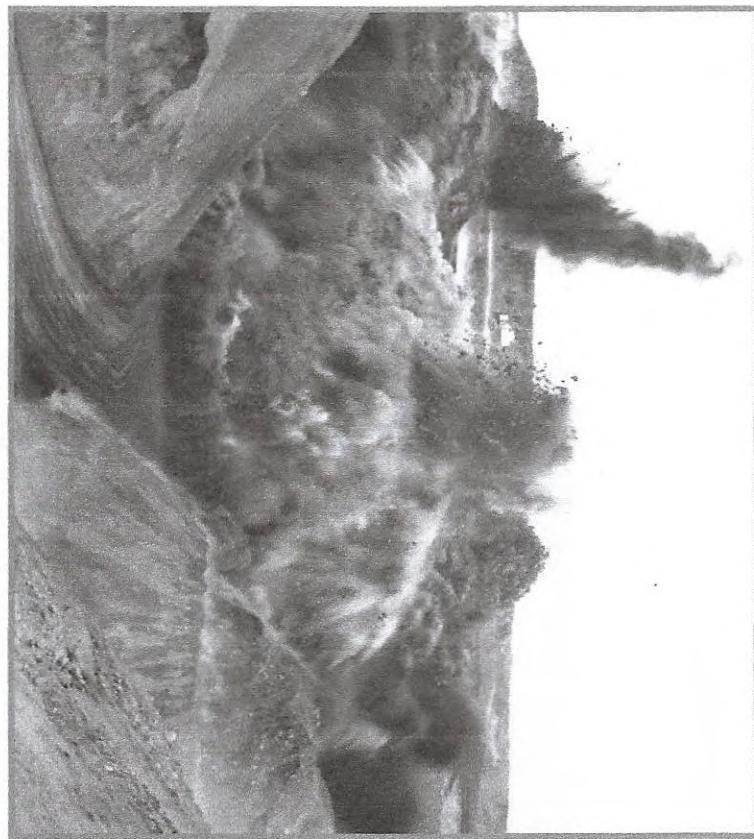
Controlling the Adverse Effects of Blasting

Exhibit 5a

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

- vibrations,
- airblast, and
- flyrock.

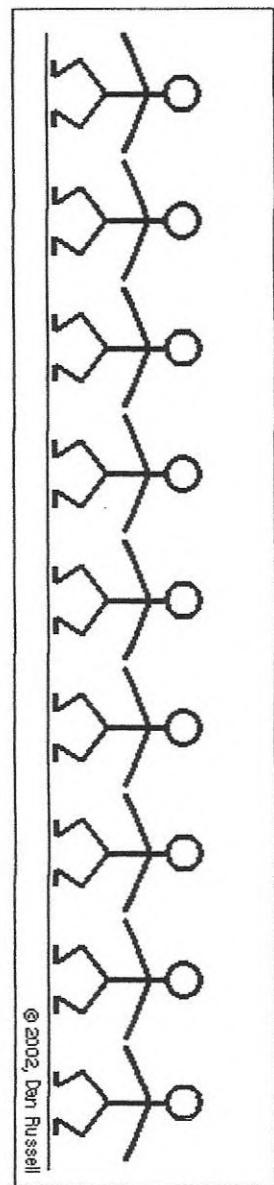
Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying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



Part I: Ground Vibrations, Airblast, and Flyrock

Exhibit 25

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**.



© 2002, Dan Russell

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.

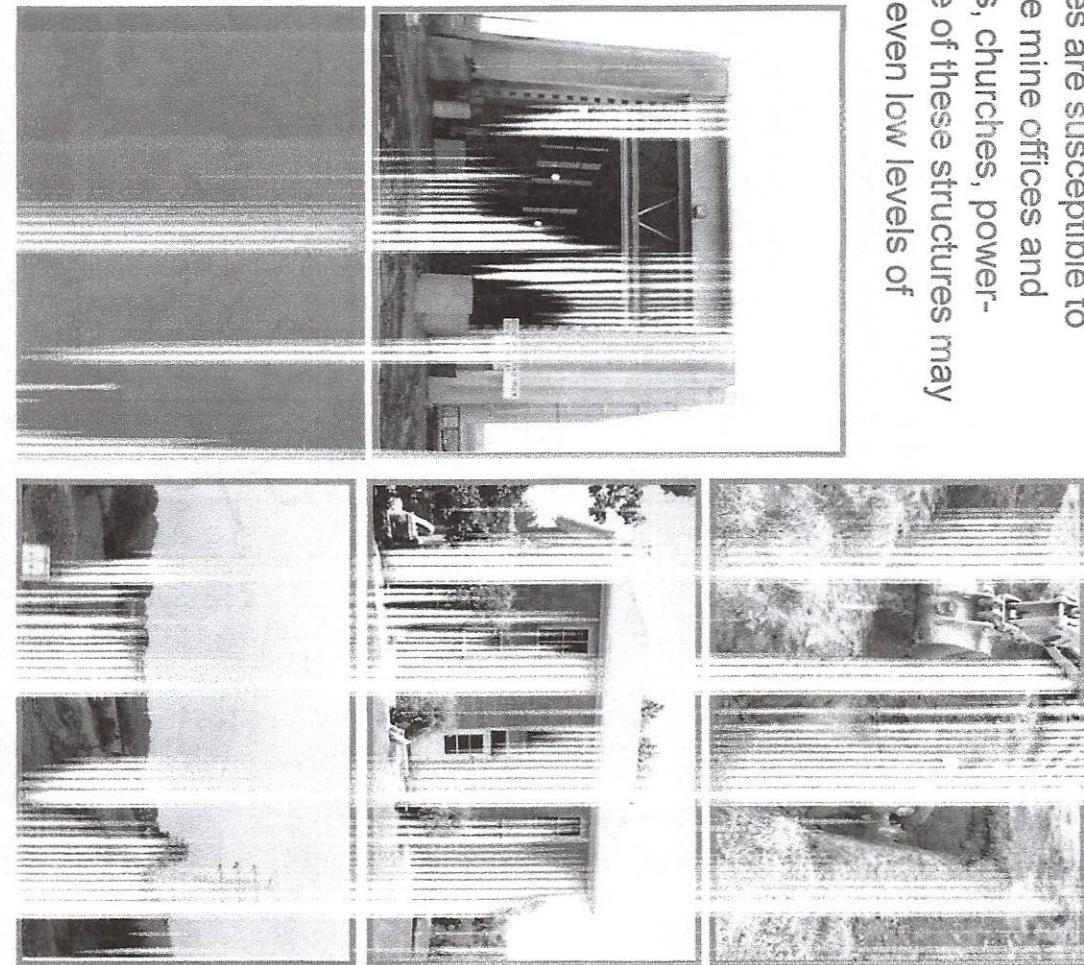
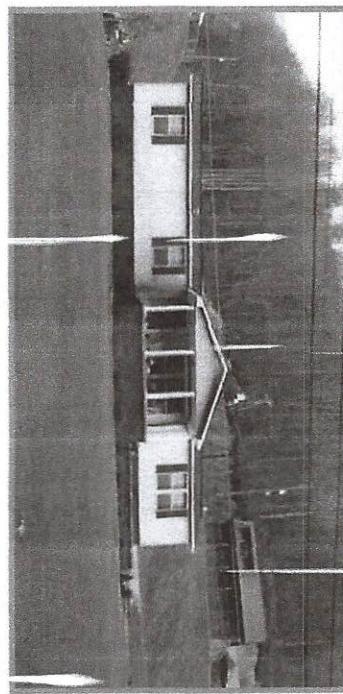
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior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

Exhibit 50

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.

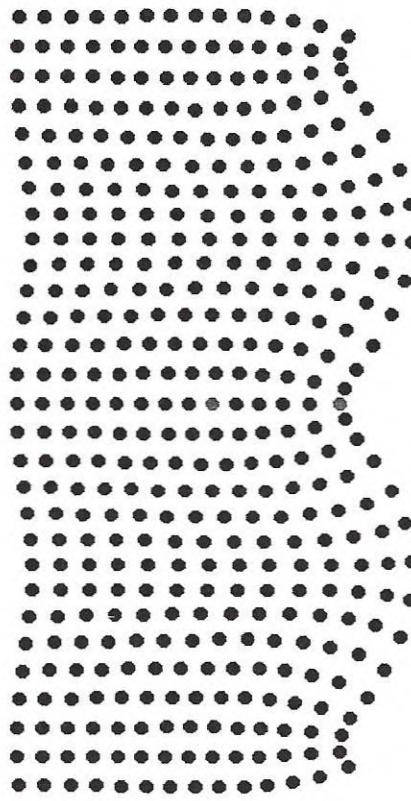


It is important to understand:

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

Ground Vibrations

Exhibit 5d
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.



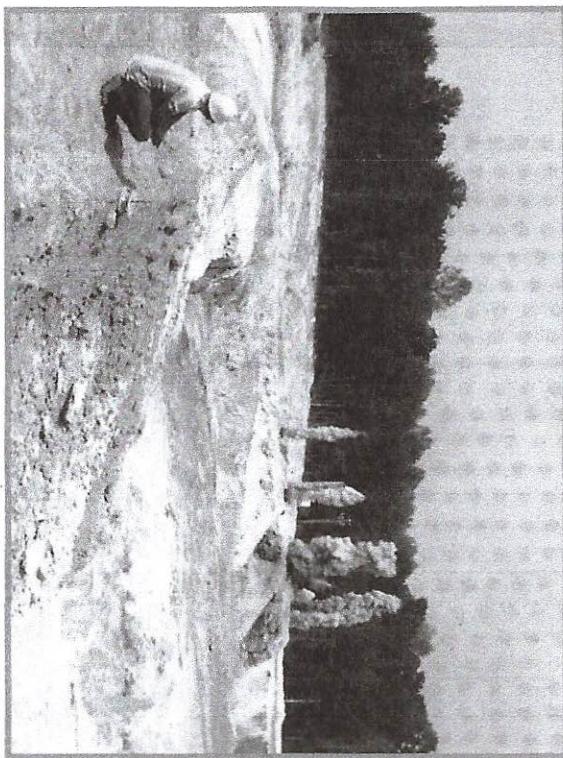
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

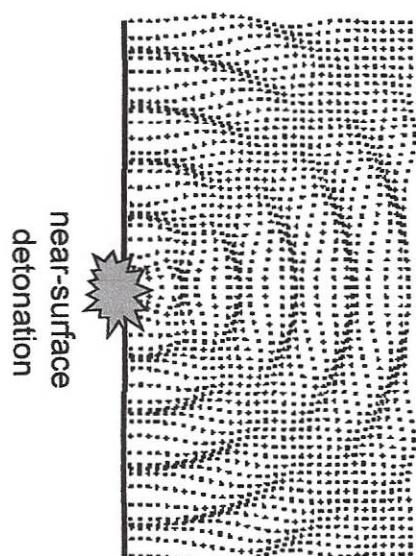
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that may be audible or inaudible. 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

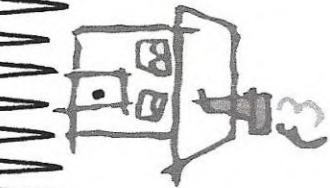
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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



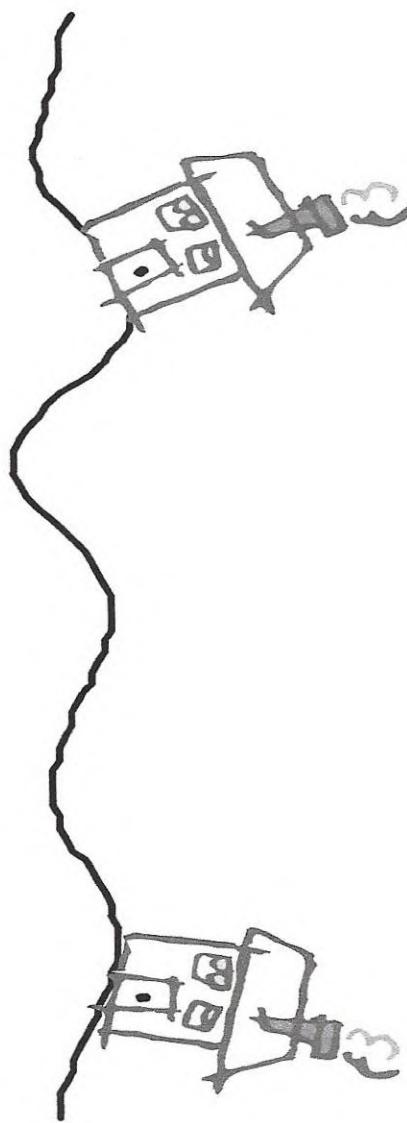
Ground Vibration Structure Response

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.



[HEART
HEALTH](#)[MIND &
MOOD](#)[PAIN](#)[STAYING
HEALTHY](#)[CANCER](#)[DISEASES &
CONDITIONS](#)[MEN'S
HEALTH](#)[WOMEN'S
HEALTH](#)[LICENSING](#)[Pay My Bill »](#)[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

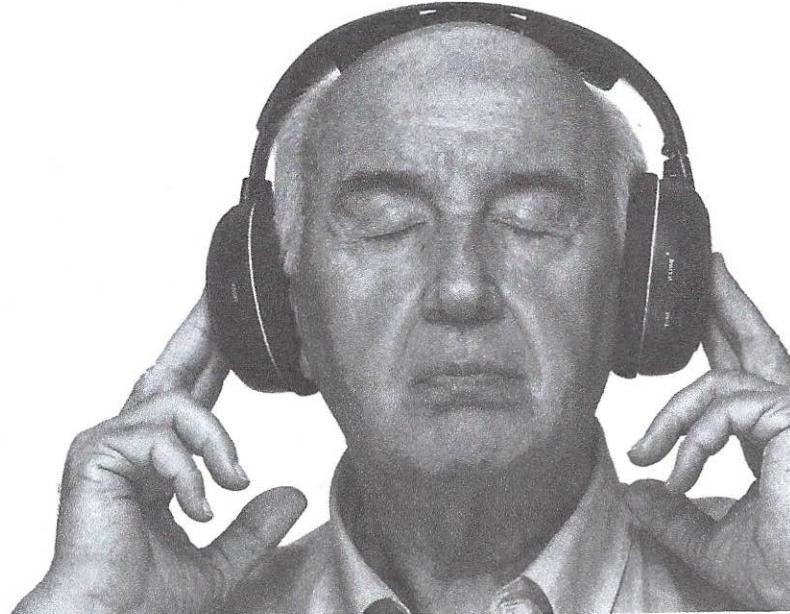


Image: © Juanmonino/Getty Images

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."



UVM Medical Center Blog (<https://medcenterblog.uvmhealth.org>) » Blog (<https://medcenterblog.uvmhealth.org/blog/>) » 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.

[Home](#)[Nursing Education](#)[Nursing News](#)[Featured Stories](#)[Headlines in Health](#)[Clinical Insights](#)[Nursing Career Development](#)[Membership](#)

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 no 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 worker (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 disruption 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 system and 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 sign 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.

References:

- Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise
- Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>
- Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

© 2015 AMN Healthcare, Inc. All Rights Reserved.



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

trauma or flashbacks.



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!

[< Previous article](#)

[Next article >](#)

Related articles





Front Psychol. 2013; 4: 578.

PMCID: PMC3757288

Published online 2013 Aug 30. doi: [10.3389/fpsyg.2013.00578](https://doi.org/10.3389/fpsyg.2013.00578)

PMID: 24009598

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

Maria Klatte, * Kirstin Bergström, and Thomas Lachmann

Center for Cognitive Science, Cognitive and Developmental Psychology Laboratory, University of Kaiserslautern, Kaiserslautern, Germany

Edited by: Nicole Wetzel, University of Leipzig, Germany

Reviewed by: Patrik Sörqvist, University of Gävle, Sweden; Emily M. Elliott, Louisiana State University, USA

*Correspondence: Maria Klatte, Department of Psychology, Cognitive and Developmental Psychology

Laboratory, University of Kaiserslautern, Erwin-Schroedinger-Strasse 57, 67663 Kaiserslautern, Germany e-mail: klatte@rhrk.uni-kl.de

This article was submitted to Developmental Psychology, a section of the journal Frontiers in Psychology.

Received 2013 May 14; Accepted 2013 Aug 12.

Copyright © 2013 Klatte, Bergström and Lachmann.

This is an open-access article distributed under the terms of the Creative Commons Attribution License (CC BY). The use, distribution or reproduction in other forums is permitted, provided the original author(s) or licensor are credited and that the original publication in this journal is cited, in accordance with accepted academic practice. No use, distribution or reproduction is permitted which does not comply with these terms.

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 (Nitrouer, 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,

Exhibit 11a

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.

8/4/2010 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](#)

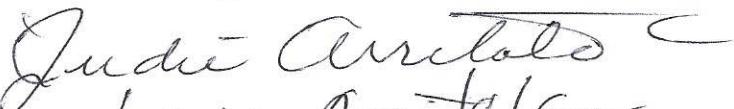


SCIENCE NEWS

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 
PRINTED NAME Judie Arntola
ADDRESS 603 Modefane LaGrande OR
EMAIL pjtolaj@charter.net

SIGNATURE 
PRINTED NAME John Gazzola
ADDRESS 484 Hawthorne DR. LG, OR 97850
EMAIL

SIGNATURE 
PRINTED NAME Andree Gulzow
ADDRESS 484 Hawthorne DR, La Grande OR 97850
EMAIL foreverfamily33@adelcore.com

SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 478 Makaike DR. OR 97850
EMAIL

SIGNATURE 
PRINTED NAME C. Huxoll
ADDRESS 472 Modelaine DR. La Grande, OR 97850
EMAIL CHRIS.HUXOLL@EMAIL.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

PRINTED NAME

Jessie Huyoll

ADDRESS

472 Madelaine DR. La Grande, OR 97850

EMAIL JESSIEHUYOLL@LIVE.COM

SIGNATURE

PRINTED NAME

Brent H. Smith

ADDRESS

410 Allium St La Grande 97850

EMAIL

smith.brent@gmail.com

SIGNATURE

PRINTED NAME

M. Jeannette Smith

ADDRESS

410 Allium Street

EMAIL

jeannetterupton@gmail.com

SIGNATURE

PRINTED NAME

KIMBERLEY HEITMAN

ADDRESS

2409 CENTURY LP, LA GRANDE, OR 97850

EMAIL

kimheitman@hotmail.com

SIGNATURE

PRINTED NAME

Shawn K. Mangum

ADDRESS

2909 E.M. Ave.

EMAIL

Hoyahkw95@me.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

Jonathan D. White
Jonathan D. White

ADDRESS

485 Madelaine Dr

EMAIL

jondwhite418@gmail.com

SIGNATURE

Robin Steinfeld

PRINTED NAME

Robin Steinfeld

ADDRESS

485 Madelaine Dr. LaGrande

EMAIL

rstedfeld@yahoo.com

SIGNATURE

Ronnie L. Allen -

PRINTED NAME

Ronnie L. Allen 541-963-7720

ADDRESS

410 Balsa Street La Grande, Oregon 97850

EMAIL

None:

SIGNATURE

Rita Allen

PRINTED NAME

Rita Allen

ADDRESS 410 Balsa St. LaGrande Or.

EMAIL

SIGNATURE

Linda M. Snyder

PRINTED NAME

Linda M. Snyder

ADDRESS

491 17704 Zaire

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. Ostermann*

PRINTED NAME *Robert J. Ostermann*

ADDRESS *495 Modelaire Dr. La Grande, OR 97850*

EMAIL

SIGNATURE *Robert J. Ostermann*
Robert J. Ostermann

PRINTED NAME

ADDRESS *495 Modelaire Dr. La Grande, OR 97850*

EMAIL

SIGNATURE *John Yeates*

PRINTED NAME *JOHN YEATES*

ADDRESS *408 SUNSET DRIVE LA GRANDE, OR 97850*

EMAIL *jyeates52@gmail.com*

SIGNATURE *Ruth Schumacher Yeates*

PRINTED NAME *Ruth Schumacher Yeates*

ADDRESS *408 Sunset Dr, La Grande*

EMAIL *ruthschumacheryeates@gmail.com*

SIGNATURE *D. Dale Mammen*

PRINTED NAME *D. Dale Mammen*

ADDRESS *405 Balsa, La Grande, OR*

EMAIL *d.mammen@poni.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



PRINTED NAME

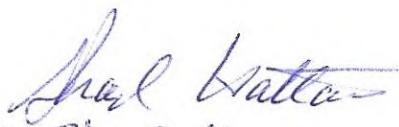
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



PRINTED NAME

Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

Geraldine BRASETH-PALMER

ADDRESS

1602 Gildcrest Drive - La Grande, Or 97850

EMAIL



SIGNATURE



PRINTED NAME

Jean RAPH

ADDRESS

1509 Madison Ave LaGrande, Or 97850

EMAIL

jraph19@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 *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 *melindaamcgowan@gmail.com*

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

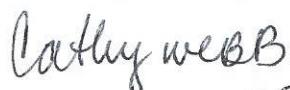
I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE 

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. LA GRANDE, OR 97850

EMAIL thinkski@gmail.com

SIGNATURE 

PRINTED NAME JoAnn MARLETTE

ADDRESS 2031 Court St. #8, Baker City, OR 97814

EMAIL garymarlette@yahoo.com

SIGNATURE 

PRINTED NAME Keith D. Hudson

ADDRESS 605 F Ave, La Grande OR 97850

EMAIL keithhudson@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 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, La Grande OR 97850
EMAIL *rlwd1910@gmail.com*

SIGNATURE *Gary D. Pierson*

PRINTED NAME Gary D. Pierson

ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL —

SIGNATURE *Anne G. Cavinato*

PRINTED NAME Anne G. Cavinato

ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL *acavinat@eou.edu*

SIGNATURE *Joe Horst*

PRINTED NAME JOE HORST

ADDRESS 86 HAWTHORNE DR. LA GRANDE OR 97850
EMAIL *joehorst@eoni.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

Merie E Comfort

PRINTED NAME

MERIE E COMFORT

ADDRESS

209 Scorpio La Grande OR 97850

EMAIL

meriecomfort@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 home La Grande OR.

EMAIL

carolssummers1938@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. La Grande, 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 *9700 Hawthorne Dr, La Grande, OR 97850*

EMAIL *asherer@frontier.com*

SIGNATURE *Heather M. Null*

PRINTED NAME *Heather M. Null*

ADDRESS *492 Madelaine 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

PRINTED NAME

ADDRESS

EMAIL

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



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) Miriam Cecilia

Mailing Address (mandatory) 1705 First st.
La Grande OR 97850

Phone Number (optional) Email Address (optional)

Today's Date: 10/20/19

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 Tardaeether, 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.)

I am not in support.



OREGON
DEPARTMENT OF
ENERGY

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)

Jay S. Chamberlin

awyhee Irrigation
DISTRICT

Mailing Address (mandatory)

422 Thunderegg Blv.
Nyssa, OR 97913

Phone Number (optional) (541) 372-3540 Email Address (optional) ordh20@fmtc.com

Today's Date: 6-18-2019

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 Tardaeether, 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.)

(additional space for written comments)

**COMMENTS OF JAY CHAMBERLIN, MANAGER
OWYHEE IRRIGATION DISTRICT**

- Department of Energy needs to insure that tower placed between Mile Posts 255 through 258 are placed in consultation with Owyhee Irrigation District's staff in order to provide for good, high clearance and minimal structural interference with existing irrigation canals, structures, and roadways
- I would like to see the term "...and existing irrigation waterways" added after "protected areas" on Page 246 of the draft proposed order.
- The statement on Page 589 of the draft proposed order that a water right transfer is unnecessary, is inaccurate. The proposed Tower placements near Mile Post 255 on existing irrigated lands will require a water right transfer to allow the water rights for that portion of the land which will be used for the tower structures will have to be transferred off of that property and onto other property.

<p style="text-align: right;">Page 30</p> <p>1 Mr. Chamberlin, your name and your address and 2 then your comments.</p> <p>3 MR. JAY CHAMBERLIN: Thank you.</p> <p>4 My name is Jay Chamberlin. I'm general 5 manager of the Owyhee Irrigation District. My address 6 is 422 Thunderegg Boulevard, Nyssa, Oregon 97913.</p> <p>7 I'd like to thank the Council for this 8 opportunity to hear our concerns. No. 1, the Department 9 of Energy needs to ensure that the tower placed between 10 mileposts 255 through 258 are placed in consultation 11 with the Owyhee Irrigation District's staff in order to 12 provide good, high clearance, and minimal structural 13 interference with existing irrigation canals, 14 structures, and roadways.</p> <p>15 We would also like to see the term "...and 16 existing irrigation waterways" added after "protected 17 areas" on page 246 of the draft proposed order.</p> <p>18 Also the statement on page 589 of the draft 19 proposed order that a water right transfer is 20 unnecessary is inaccurate. The proposed tower placement 21 near milepost 255 on existing irrigated lands will 22 require a water right transfer to allow that those water 23 rights be transferred to other portions of land, if 24 indeed that tower is placed there.</p> <p>25 And other than that, I think we, as an</p>	<p style="text-align: right;">Page 32</p> <p>1 resources and people from one group of people to 2 another.</p> <p>3 So I think one of the things that's happened 4 with this line is that it's kind of been a divide and 5 conquer thing where people who don't want this line to 6 happen, and actually there was a meeting in La Grande 7 with probably 400 people in the room, and when they were 8 asked, Does anyone support this line, no one did. But 9 people want, nobody wants to have to experience the 10 impact so they argue that it should hurt other things. 11 So we are not doing that.</p> <p>12 Today I'm going to focus on just actually 13 about 25 pages of the draft proposed order, the section 14 regarding noise. And these are not all the issues but I 15 thought I would list some of them. I'm not going to 16 meet the standard to provide rules; I will give that to 17 you folks later in written testimony prior to the 18 July 23rd deadline.</p> <p>19 But starting off, the Oregon standards allows 20 for more noise than is recommended by the World Health 21 Organization and the standard that is used in most other 22 countries. In Malheur County alone, there are 26 23 residences that are considered "noise sensitive 24 residences" within one-half mile of the transmission 25 line. That means that they will be subject to noise</p>
<p style="text-align: right;">Page 31</p> <p>1 irrigation district, have been part of the process all 2 along. It certainly isn't where we would like it to 3 see, but we have worked and we would certainly be 4 willing to continue to do such so that we can have as 5 least amount affected our waterways and transmission 6 systems ourselves as possible.</p> <p>7 Thank you.</p> <p>8 HEARING OFFICER WEBSTER: Thank you.</p> <p>9 Following Ms. Gilbert we will hear Michael 10 Horton.</p> <p>11 MS. IRENE GILBERT: Should I start?</p> <p>12 HEARING OFFICER WEBSTER: Yes, please do, with 13 your name and your address, please.</p> <p>14 MS. IRENE GILBERT: Irene Gilbert, 2310 Adams 15 Avenue, and I'm here representing myself but also 16 Friends of the Grande Ronde Valley, and I am a member of 17 Stop B2H so I certainly hope my comments would be 18 considered coming from that group also.</p> <p>19 A few things first is, in particular with the 20 B2H group, there are now over 500 members, as I 21 understand, individual members and multiple nonprofits 22 who are members of that group. And we are focused on 23 impacts to the entire route, along the entire route. So 24 Stop B2H has not said we prefer that you move the line 25 from here to there; it only moves the impacts on the</p>	<p style="text-align: right;">Page 33</p> <p>1 increases. Only a few of them actually exceed the 2 standards and the rest are ignored. The noise at 3 residences not exceeding the standard could increase by 4 up to 10 decibels.</p> <p>5 Given that the Oregon Health Authority has 6 stated in their report regarding noise from wind 7 turbines that an increase of 3 decibels is perceived as 8 doubling the noise at a location. So as you can see, 9 there are a lot of people who are going to be 10 experiencing noise impacts that aren't being told that 11 that's going to happen. There's also documentation of 12 people actually exceeding the standard that are residing 13 more than a half mile from the proposed transmission 14 line. So there are a lot of people that don't know 15 what's going to happen here who will get a surprise.</p> <p>16 There was no modeling of helicopter, road 17 legal vehicles or auxiliary equipment in establishing 18 the noise impacts, which is actually required in 19 modeling the impacts of this development in relation to 20 the 50 dBA noise limit. Idaho Power chose to ignore a 21 piece of the statute that requires that.</p> <p>22 No modeling or inclusion of schools, churches, 23 hospitals or public libraries in the noise modeling.</p> <p>24 That's also required.</p> <p>25 No modeling of the entire site, including</p>

✓

COMMENTS OF JAY CHAMBERLIN, MANAGER
OWYHEE IRRIGATION DISTRICT

- Department of Energy needs to insure that tower placed between Mile Posts 255 through 258 are placed in consultation with Owyhee Irrigation District's staff in order to provide for good, high clearance and minimal structural interference with existing irrigation canals, structures, and roadways
- I would like to see the term "...and existing irrigation waterways" added after "protected areas" on Page 246 of the draft proposed order.
- The statement on Page 589 of the draft proposed order that a water right transfer is unnecessary, is inaccurate. The proposed Tower placements near Mile Post 255 on existing irrigated lands will require a water right transfer to allow the water rights for that portion of the land which will be used for the tower structures will have to be transferred off of that property and onto other property.

✓

Owyhee Irrigation District
422 Thunderegg Blvd.
Nyssa, OR 97913

Phone: (541)372-3540
Fax (541)372-2437

August 14, 2019

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

RE: Idaho Power Proposed Boardman to Hemingway Transmission Line

Dear Kellen:

I am the District Manager for the Owyhee Irrigation District. I am submitting these comments on behalf of Owyhee Irrigation District. I made verbal comments on the proposed transmission line at the Public Hearing on the matter on June 18, 2018, in Ontario, Oregon.

In my comments, I expressed concern over the proposed power line's crossing of the Owyhee River. Most of the public testimony at the hearing focused on this area. During the hearing, the Idaho Power representative stated that the proposed line placement was going in this area due to the fact that BLM in its final Environmental Impact Statement determined that this route was preferred over the alternative Malheur "S" route which was identified in the final EIS, but not chosen as the preferred route. The Malheur "S" alternative, however, was not completely eliminated as a possible alternative route in the EIS.

As the Energy Facility Siting Council heard at the Public Hearing in Ontario on June 18, the proposed crossing of the Owyhee River in this area has a substantial negative impact on not only the irrigation district, but also the private property landowners in that area.

The Owyhee Irrigation District's elected Board of Directors strongly urges the Council to consider the Malheur "S" alternative identified on Map 2-7e in the final EIS. A copy of the map is attached. Another one of the preferred routes of the Owyhee Irrigation District is the Malheur "A" alternative, which is also shown on the attached map.

Both the Malheur "S" and Malheur "A" alternative routes are located along the edges of (within or closely parallel to) a west-wide energy corridor, within which is an existing 500-KV transmission line.

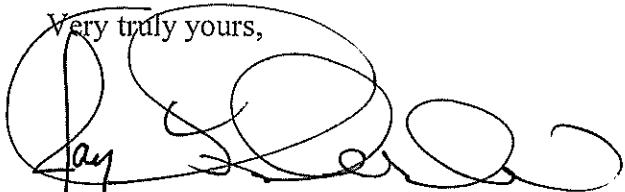
Kellen Tardaewether, Senior Siting Analyst

August 14, 2019

Page 2

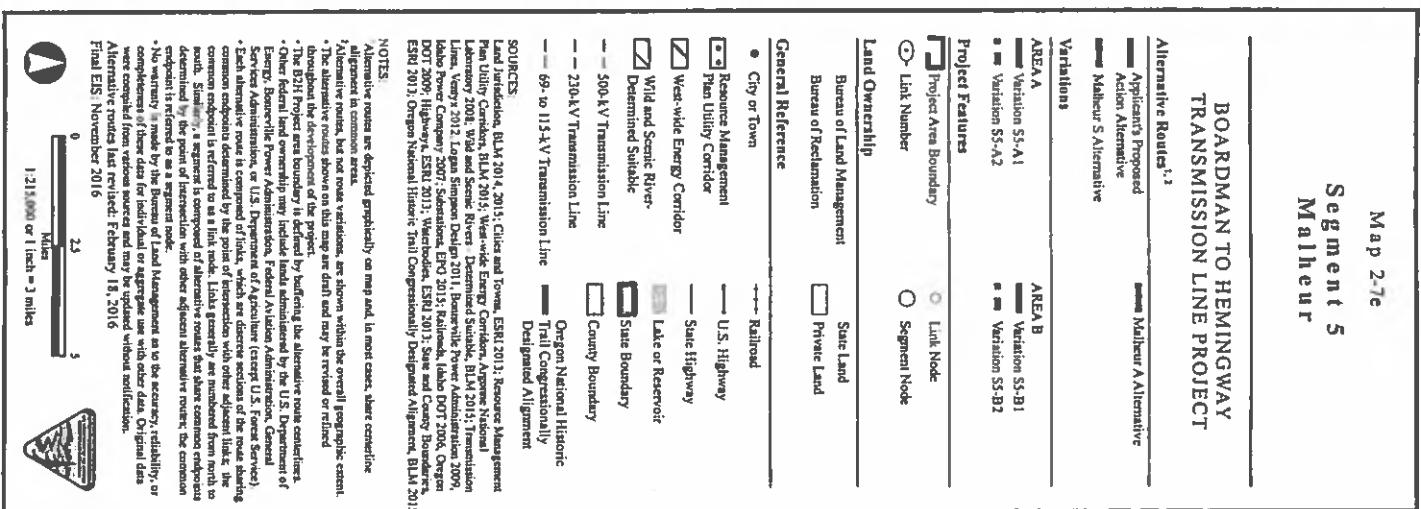
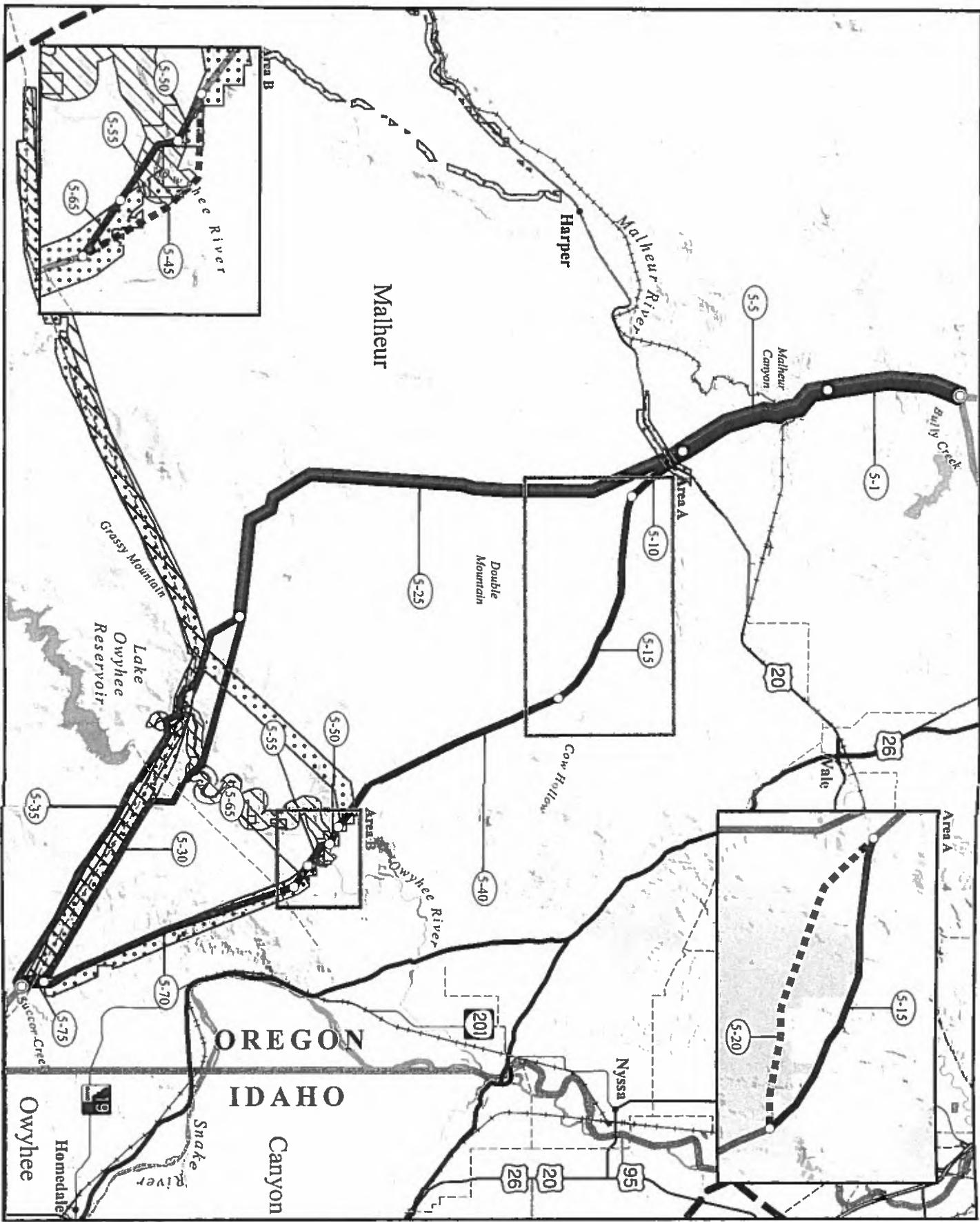
The proposed route near the Owyhee River creates potential problems with Bureau of Reclamation and Irrigation District facilities that the alternatives South and Malheur A alternative do not. The topography of the land east of the Owyhee River where the proposed route is to cross the Owyhee River is highly unstable. The construction and location of the proposed power line in that area could cause catastrophic loss of the Kingman Lateral resulting in possible flooding and damage to the proposed power line itself. The lateral has slid off of the mountain in this area before. If the power line were to be constructed in this area, substantial mitigation, including the possible piping of the Kingman Lateral would be required. This area also includes an access road to the North Canal of the Owyhee Project and the Kingman Lateral. This is an area of high activity for personnel and heavy equipment. The placement of the power line in this area will put not only the heavy equipment and personnel at risk, but also the power line.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay Chamberlin". The signature is fluid and cursive, with the name written in a larger, more formal style than the initials.

Jay Chamberlin,
District Manager

Encl.



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 affects 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,

Wendy Chamberlin
Signature

Printed Name:

Wendy Chamberlin

Mailing Address:

402 2nd St

Email: La Grande, OR 97850

p5.17apple@yahoo.com

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: *Wendy Chamberlin*
Mailing Address:

*402 2nd St
La Grande, OR
97850*

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 $\frac{1}{4}$ 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.

Wendy Chamberlin
Signature

Wendy Chamberlin
Printed Name

Mailing Address:

402 2nd St
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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I do it was extensive because it is entirely 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) 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 a 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

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 a 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.

Wendy Chamberlin
Signature

Name: Wendy Chamberlin

Address:

402 2nd St
La Grande, OR 97850

12 August 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:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.

Wendy Chamberlin
(Signature)

Name: Wendy Chamberlin

Address

402 2nd St
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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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,

Wendy Chamberlin
Signature

Printed Name: Wendy Chamberlin

Mailing Address:

402 2nd St
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, 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,

Wendy Chamberlin

Name: Wendy Chamberlin

Address: 402 2nd St
La Grande, OR. 97850

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,



Name Wendy Chamberlin
Address 402 2nd St
 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: *Wendy Chamberlin*

Mailing address:
*402 2nd St
La Grande, OR 97850*

Email address: *ps.17.apple@yahoo.com*
phone number: (optional)

503-440-6530

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,

Wendy Chamberlin

Name: Wendy Chamberlin

Address:

402 2nd St.
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) Norm Cimon

Mailing Address (mandatory) 1208 First St.
La Grande, OR

Phone Number (optional) (541) 963-0953 Email Address (optional) _____

Today's Date: 6/20/2019

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 106</p> <p>1 established, and let's say they put access roads down 2 that right-of-way and use it. 3 In eastern Oregon, trespass elk hunting is a 4 big problem, and you want to lock your ground up so you 5 don't spread weeds or vandals. And some of these guys 6 are pretty ornery, to the point you need legal, just a 7 pack of sheriffs to deal with your problems, with a 8 person that is not going to cooperate if you ask them 9 nicely.</p> <p>10 So I know OHV-ATV trails, they provide funding 11 for enforcement. I think there will have to be some 12 sort of follow-up in the mitigation plans to help 13 landowners to enforce the promises that Idaho Power 14 submits.</p> <p>15 HEARING OFFICER WEBSTER: Before you leave, 16 can you repeat or spell the name of the invasive grass 17 that you --</p> <p>18 MR. THOMAS THOMPSON: Ventenata dubia. If 19 it's not an amoeba, if it's not in the vegetation 20 management plan, it wasn't site specific enough. Not 21 only the power line and poles, but the access roads.</p> <p>22 HEARING OFFICER WEBSTER: Thank you.</p> <p>23 MR. NORM CIMON: My name is Norm Cimon, 24 C-i-m-o-n. I live at 1208 First Street. I'm a systems 25 analyst. I'm retired but I still have my own company.</p>	<p style="text-align: right;">Page 108</p> <p>1 storage, smart meters, and smart inverters is reworking 2 the way that utilities participate in the marketplace. 3 The pace of that change will [only] accelerate..." 4 "The key points are as follows: 5 "Within 10 to 15 years much of the power on 6 the grid will come from widely distributed generating 7 sources. 8 "Many of these sources will be small to 9 moderately sized providers hosted through standalone 10 microgrids. 11 "Top-down control of those thousands of 12 emerging sources will no longer be viable." 13 You can't have tens of thousands of sources 14 managed the way we've been managing it. What we need is 15 something that looks a lot more like the Internet. That 16 is exactly what has been proposed by our research 17 organizations that are looking into this. 18 "The rules needed to provide robust management 19 for many of those sources will mimic those of the 20 Internet protocols which provide information from the 21 bottom up. 22 "Distributed generation will make the grid: 23 More reliable, more resilient, safer to operate." 24 That is all over the engineering journals. In 25 fact, large power grids tend to collapse, and there is</p>
<p style="text-align: right;">Page 107</p> <p>1 I have acted as a consultant for the Stop B2H group. 2 And I'm also a board member of the same organization 3 that Mr. Whitaker talked about, Oregon Rural Action. 4 I'd like to thank the Commission for making 5 their way to La Grande to listen to our concerns. And I 6 will be submitting a detail analysis of Exhibit H, the 7 geology and the soils. 8 I feel there is a weakness in the bonding, 9 that there is some substantial problems with the route 10 itself. I don't know that there is much choices. The 11 fact is that the bulk of the trail, or the route that 12 goes across the Blue Mountains goes right through severe 13 erosion potential. So I will be submitting all of that. 14 What I'd like to read into the record for the 15 future is something that I know a lot about, and I think 16 it's going to greatly impact the future. I think we 17 need to have this stuff in the record so that people can 18 look back, which is the age we are in now. We are 19 talking social media; we are talking the web. 20 Everything is public; there is no private stuff anymore. 21 The decisions are always going to be known, whatever 22 happens. 23 "An Overview: The electric grid, which has 24 remained in the same basic form for 100 years, is 25 changing very rapidly. The introduction of battery</p>	<p style="text-align: right;">Page 109</p> <p>1 no way to stop it. It's a huge argument going on in the 2 engineering community right now about just that. The 3 grid in a nutshell is chaotic. You cannot predict when 4 it's going to go down. Big stuff just makes it happen 5 more often and bigger. 6 "The paradigm shift will make much of the 7 high-voltage transmission system obsolete. 8 "That obsolescence will occur long before the 9 proposed 50 years of financing [for this project]. 10 "The proposed Boardman to Hemingway 500kV 11 power line is unneeded. Idaho Power's own data clearly 12 shows that the utility's electric demand has been flat" 13 [from 2007 to 2016]." 14 And that's because even with population growth 15 we are seeing efficiencies, we are seeing conservation, 16 and we are seeing renewables. So it's all changing 17 very, very quickly. 18 "The existing grid will be eclipsed by a 19 decentralized system. High-voltage, long-distance power 20 lines will be increasingly underutilized. Moreover, 21 such lines are inherently unstable and dangerous. They 22 are fire hazards in arid, semi-arid, and forested 23 environments -- the ecosystems along any proposed route 24 for the line in eastern Oregon." 25 Everything we have around us is fire prone.</p>

<p>1 In fact, the vegetation literally needs to burn to 2 regenerate.</p> <p>3 "The line will be an economic burden, enabled 4 by an out-of-date business model with increasing risk 5 and decreasing financial viability. An economist and 6 ex-president of the 'Society for Risk Analysis'" -- some 7 of these actually brought in by utilities -- "had this 8 to say about billion dollar investments such as this 9 one:</p> <p>10 "If you were silly enough to think about 11 investing in transmission, we would tell you that we 12 don't have any idea how you're going to get reimbursed 13 or how much you are going to get reimbursed.</p> <p>14 "The guaranteed rate-of-return offered up to 15 regulated utilities places that financial burden 16 squarely on the backs of ratepayers, removing money from 17 their pockets and" -- it takes it right out of the local 18 economies. That is what funding this thing will do, in 19 my opinion, because it's going to be obsolete long 20 before that 50-year financing lifespan. This provides 21 context for what I will be writing up.</p> <p>22 So you have a very difficult decision in front 23 of you. These paradigm shifts are difficult, I will not 24 kid you, but that's exactly what's going on, and we are 25 starting to see it now accelerate.</p>	<p>Page 110</p> <p>1 If you could imagine for a brief moment an 8th 2 grade me, getting dropped off near Table Mountain and 3 walking the Oregon Trail from Table Mountain to Hilgard 4 State Park. A popular kid, I guess, too good for 5 walking the Oregon Trail. I didn't listen, didn't pay 6 much attention.</p> <p>7 Fast forward, and unbeknownst to me, I married 8 a gal that is a granddaughter of the person that owns 9 the trail I walked or the property in which the Oregon 10 Trail sits. So now I'm here today.</p> <p>11 So as a person who helps out, caretake for 12 this property, my wife and I, we became aware of the B2H 13 power line about, around 2015, give or take.</p> <p>14 Fast forward a little ways, we ended up having 15 a meeting with some gentlemen in the back of the room 16 here from Idaho Power. I asked the question of why is 17 it that we are just now being made aware of this when 18 it's been in the works for some time. And basically 19 they didn't have an answer for it.</p> <p>20 Well, unbeknownst to these guys, I was aware 21 of a lot of the reasons why, and the reason why is 22 money. If we can't talk about the Glass Hill route, 23 apparently it's taboo, but it run into a lot of 24 litigation, I get it.</p> <p>25 So I know we can't take that into account, but</p>
<p>1 We had a congressman from Idaho just propose 2 that all the dams in the Snake River be taken down. The 3 BPA -- I'm on the Grande Ronde Model Watershed Board, 4 and I'm not speaking for them. BPA approached us and 5 told us that they expect that in the next cycle of 6 planning for the power distribution to the co-ops and 7 PUDs, we had them tell us quite clearly they expect a 8 lot of them are going to walk out the door. That's 9 because the power is getting cheaper from renewables.</p> <p>10 What's going to happen then is the cycle where 11 the people who are -- organizations, utilities that are 12 left on the grid, the BPA grid, will simply be charged 13 more, which means more of them will walk out, which 14 means the others will be charged more. That kind of 15 vicious cycle can just blow organizations apart.</p> <p>16 So there is great concern amongst the 17 congressional delegations and also amongst the power 18 plants in the Northwest.</p> <p>19 Thank you very much and good luck with your 20 decision. It's a tough one.</p> <p>21 HEARING OFFICER WEBSTER: Thank you.</p> <p>22 MR. RYAN BROWN: My name is Ryan Brown. I'm a 23 resident of La Grande, and I represent seven generations 24 of the Webster property, which looking west from 25 La Grande is the horizon that you see.</p>	<p>Page 111</p> <p>1 I was told that the comment period for the proposed 2 route and the alternative route had passed. Well, the 3 comment period for that was before we ever received the 4 letter.</p> <p>5 So my question to the gentlemen in the back 6 was: What happens if the poles that go in devastate the 7 property so much that we lose our water? There are 8 three springs on the property, all of which are within 9 200 or less feet of proposed towers. If we lose those 10 three springs, our property is no longer workable.</p> <p>11 When I asked them this question, and much like 12 in the ORS, the burden is on us as landowners. We have 13 to prove by paying somebody, we aren't going to do it 14 ourselves, but paying somebody professional to calculate 15 the flow of water and present what damage has been done. 16 Does that make any sense? After it's gone in we have to 17 prove. Is that backwards? Guilty until proven innocent 18 in our society; right?</p> <p>19 So fast forward a little bit more, we allowed 20 surveyors from Idaho Power, contracted surveyors, and 21 they walked right over the Oregon Trail; they didn't 22 even know it existed.</p> <p>23 I encourage you to listen to these people. We 24 are not attorneys, we are not going to comb through 25 thousands of papers. We don't have the time, it's</p>

Wynn Cimow

Overview

The electric grid, which has remained in the same basic form for 100 years, is changing very rapidly. The introduction of battery storage, smart meters, and smart inverters is reworking the way that utilities participate in the market place. The pace of that change will accelerate very quickly.

The key points are as follows:

- Within ten to fifteen years much of the power on the grid will come from widely distributed generating sources
- Many of those sources will be small to moderately sized providers hosted through standalone microgrids
- Top-down control of those thousands of emerging sources will no longer be viable
- A different grid with digitally managed locally sourced **ENERGY IS EMERGING**
- The rules needed to provide robust management for many of those sources will mimic those of the internet protocols which provide information from the bottom up
- Distributed generation will make the grid
 - More reliable
 - More resilient
 - Safer to operate
- The paradigm shift will make much of the high-voltage transmission system obsolete
- That obsolescence will occur long before the proposed 50 years of financing

The proposed Boardman to Hemingway 500KV power line is unneeded¹. Idaho Power's own data clearly shows that the utility's electric demand has been flat for ten years. Population growth in their service area has been completely matched by conservation, more efficient appliances and equipment, and by the rapid rise of renewable energy (Figure 1).

¹ [A recent article in Forbes](#) about Green Mountain Power and its CEO Mary Powell drives this home:

"It's a completely underutilized grid that's getting worse by the minute. You are taking this completely uneconomically inefficient system and doubling down on infrastructure investment...The U.S. spent \$10 billion last year on infrastructure, while we have at the same time technologies that allow customers to become more energy independent."

The challenge is to avoid what Powell refers to as "financial Armageddon," the dreaded 'death spiral' in which customers deploy increasingly efficient energy-consuming technologies while installing solar panels on their rooftops and batteries on-site. This reduces overall consumption and revenue, leading to higher rates that in turn stimulate more customer and load defection. Powell indicates that the best response to this dynamic is to change the relationship with the customer, to think about other ways of serving the customer's energy needs and moving beyond supply and delivery of electrons.

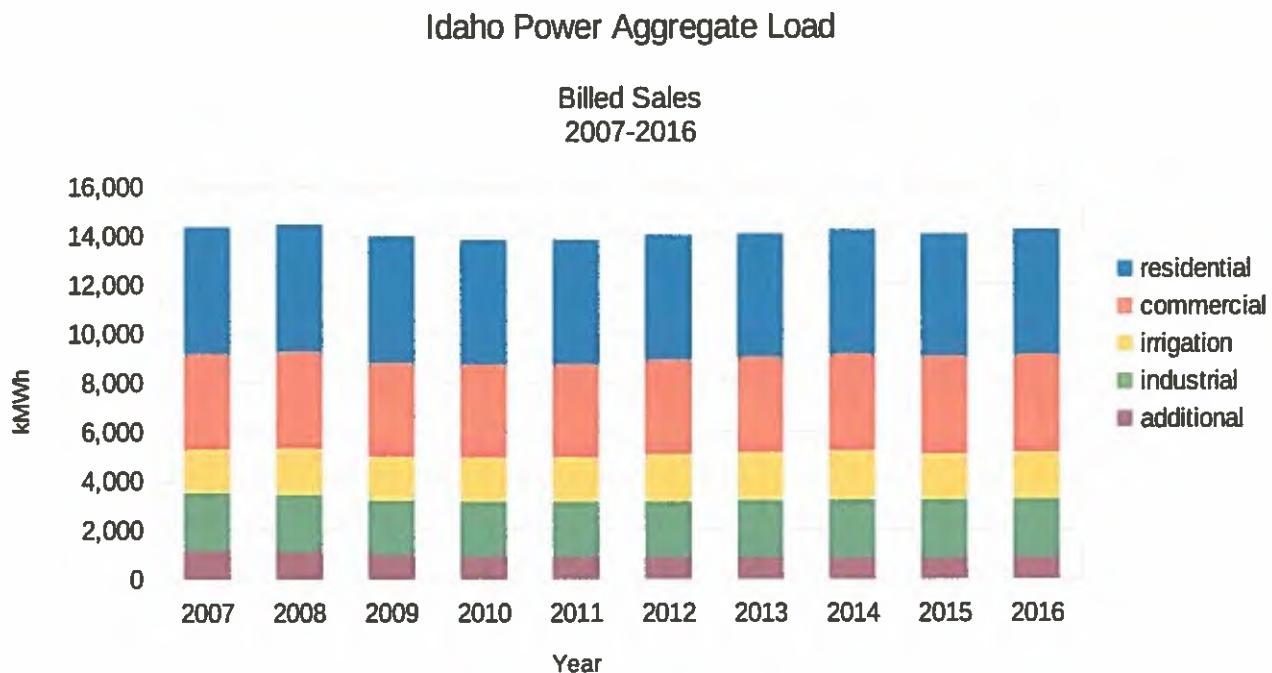


Figure 1: Electric demand in the Idaho Power service area

The existing grid will be eclipsed by a decentralized system. High-voltage long-distance power lines will be increasingly underutilized. Moreover, such lines are inherently unstable and dangerous. They are fire hazards in arid, semi-arid, and forested environments — the ecosystems along any proposed route for the line in Eastern Oregon. Utilities will be safer, more robust, and more resilient with distributed generation.

The line will be an economic burden, enabled by an out-of-date business model with increasing risk and decreasing financial viability. An economist and ex-president of the Society for Risk Analysis had this to say about billion dollar investments such as this one:

“If you were silly enough to think about investing in transmission, we would tell you that we don’t have any idea how you’re going to get reimbursed or how much you’re going to get reimbursed,” ~ Lester Lave

The guaranteed rate-of-return offered up to regulated utilities places that financial burden squarely on the backs of ratepayers, removing money from their pockets and from the local economies they power.

This provides context for my analysis of Exhibit H of the Idaho Power application.

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 $\frac{1}{4}$ 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 $\frac{1}{4}$ 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.

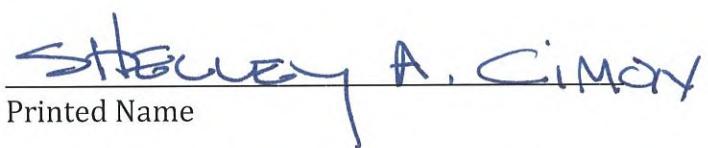
In summary:

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:

1208 First St
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, 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,

 8/16/2015

Name:

Address: 
La Grande, OR. 97850

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: 1208 First St.

Lake 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.

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.

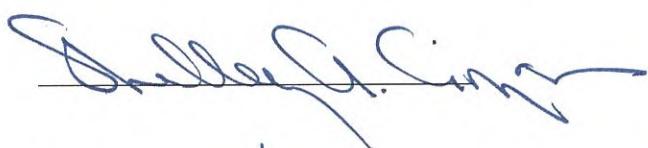
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire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

Address: 1208 First St
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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I do not believe it was extensive because it is entirely 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) 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.

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 a 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: Sherry A. Cimon

Address: 1208 First St,
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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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: *Stanley A. Cimino*

Mailing Address:

*1208 First St.
La Grande, Or
97850*

12 August 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:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within $\frac{1}{2}$ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.


(Signature)

Name: Stanley A. Cimont
Address: 1208 First St.
Ux 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:

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

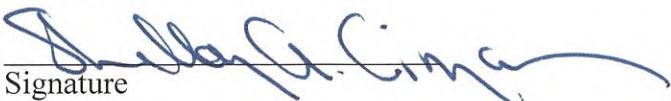
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources 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:

SHELLEY A. CIMON
1208 FIRST ST
UR GRANDE, OR 97850

ESTERSON Sarah * ODOE

From: Judy Mittenthal <tjlranch@gmail.com>
Sent: Thursday, August 22, 2019 9:47 AM
To: B2H DPOComments * ODOE
Subject: B2H Transmission Line in Pilot Rock
Attachments: B2H Blasting Concerns V.pdf; B2H Raptor Nenet Concern V.pdf; B2H Noxious Weed Concern V.pdf

Attached are several letters voicing my concerns along with the total disregard of our property.

Vera Clarke

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

August 22, 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,

Vera Clarke

Name: Vera Clarke

Address: PO Box K, Pilot Rock, OR 97868

August 22, 2019

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

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

Dear Chair Beyeler and Members of the Council;

Thank you for the opportunity to comment on the Draft Proposed Order for Idaho Power's B2H project.

IPC's "Noxious Weed Plan" fails to take responsibility for spreading noxious weeds in several alarming ways. Here is an excerpt from their Plan (Monitoring 6.1):

As stated above, noxious weed monitoring and control will occur during the first 5-year period. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will conclude that it has no further obligation to monitor and control noxious weeds in that area of the Project. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, or may request a waiver from further noxious weed obligations at these sites.

To start with, the landowner or occupant of land in this case, is required by law to control weeds in perpetuity—not just for 5 years! To say that IPC "has no further obligation" and can "request a waiver" is in blatant disregard to the law.

From Chapter 569 of Oregon law (https://www.oregonlegislature.gov/bills_laws/ors/ors569.html):

569.180 Noxious weeds as public nuisance; policy. *In recognition of the imminent and continuous threat to natural resources, watershed health, livestock, wildlife, land and agricultural products of this state, and in recognition of the widespread infestations and potential infestations of noxious weeds throughout this state, noxious weeds are declared to be a public nuisance and shall be detected, controlled and, where feasible, eradicated on all lands in this state. It is declared to be the policy of this state that priority shall be given first to the prevention of new infestations of noxious weeds and then to the control and, where feasible, eradication of noxious weeds in infested areas. [Formerly 452.615]*

569.390 Owner or occupant to eradicate weeds. *Each person, firm or corporation owning or occupying land within the district shall destroy or prevent the seeding on such land of any noxious weed within the meaning of ORS 569.360 to 569.495 in accordance with the declaration of the county court and by the use of the best means at hand and within a time declared reasonable and set by the court, except that no weed declared noxious shall be permitted to produce seed.*

Secondly, IPC flagrantly flaunts Oregon law by proposing to treat only Class "A" and "T" (a rotating list of weeds for focused treatments in a given year) weeds- ignoring the majority of weed species. Class A weeds are mainly agricultural weeds and weeds which an entity (County or State) believes they have the best chance of controlling i.e. known patches are few in that area. Class B and C weeds are generally the worst weeds, spreading most aggressively and to more areas, thus threatening and ultimately devastating the most native habitat. Why should Idaho Power be exempt from responsibility for the FULL list of weeds? This is absolutely awful proposition, but especially awful for Union County, where 81% of the land that would be wrecked by the B2H project is private land. Putting the route through federal lands, IPC at least gives a nod to Agency (BLM or USFS) rules for weeds. On private lands in Union County, several of the landowners in on "Proposed" or "Morgan Lake Alternative" routes have labored for years, even decades, to control weeds and maintain native habitats. Case in point are Joel Rice and the City of La Grande (Morgan Lake Park). Now Idaho Power comes along to trash these natural areas. The B2H project is set to become a conduit for the worst noxious weed species to be injected into some of the best native habitat in our County.

"B2H Noxious Weed Plan Comments" is a document collated by weed supervisor Brian Clapp of Union County after a meeting of Morrow, Umatilla, and Union counties, Oregon Dept. of Ag and Tri-County CWMA on August 22, 2017 to go over the B2H Attachment P1-5 Noxious Weed Plan. These comments reflect some of my concerns about weeds. I find it nearly unbelievable the Comments by weed managers are NOT acknowledged in IPC's Plan, published over a year later!

To top the travesty of IPC's "Noxious Weed Plan" the Plan states they are not responsible for "areas outside of the ROW". The weed sites immediately outside areas of potential disturbance are definitely going to spread to disturbed areas --but would not even be recorded! Noxious weeds would explode near the ROW, ruining native habitat, trashing decades of work by landowners, and with no accountability by IPC. IPC is proposing a huge area of disturbance; their responsibility should not be limited to the ROW.

I urge you to strongly deny IPC's B2H Application. IPC's "Noxious Weed Plan" does not comply with Oregon law. They deny responsibility for control of most weed species, deny responsibility for weed control after 5 years, control weeds only once a year, and give themselves a waiver when control fails. EFSC should reject the Weed Plan and Application.

Sincerely,



Name: Vera Clarke
Address: PO Box K, Pilot Rock, OR 97868

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

August 22, 2019

SETBACKS FROM RAPTOR NEST SITES

A 0.5 mile setback area around all sensitive raptor nests which includes all permanent and temporary disturbances associated with the proposed project is necessary to meet the requirement that the project not result in adverse population-level impacts to these species.

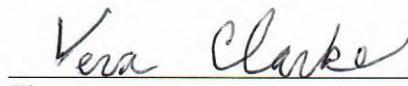
The Applicant identifies Category 1 Habitat for nest sites of golden eagle, Swainson's Hawk, goshawk, and burrowing owl. However, the applicant considers these point habitats with no associated range. While this approach is convenient, it is inconsistent with historical regulatory measures (e.g. forestry practices) regarding sensitive and threatened and endangered wildlife species in Oregon. In the Columbia Basin, Category 1 habitat associated with Washington ground squirrel colonies were defined as being occupied area AND its associated use area. The area around a natal site is integral to the continued use of the site. Wildlife need more than a specific point to be successful. ODFW has previously recommended a ½ mile setback (no impact) around all sensitive raptor nest sites. This buffer needs to include all permanent and temporary disturbances associated with the proposed project. The applicant has provided no population data for the potentially affected raptor species—especially the low density raptors (e.g. burrowing owls, goshawk and golden eagle) to show that the impacts to these species are sustainable to local populations of these species.

The current application fails to provide information necessary to determine habitat Category. Absent information that will identify the location of Category 1 habitat, it is not possible to issue a site certificate that provides that no Category 1 habitat will be impacted directly or indirectly by the development. This precludes a determination that the developer is able to site the transmission line in compliance with OARs 345-022-0060.

According to USFWS 501 FW 2, Appendix 2, the following information is necessary in order to determine habitat category determinations.

- (2) "Identify those special biological features or the area(s) in question that are considered pertinent to the resource category determination (i.e. species, species life stages, species life requisites, species groups and species diversity considerations). Also identify any special vegetative and physical site conditions that enter into consideration."
- (3)"In quantitative or qualitative terms, discuss the importance ascribed to the special features and conditions in number 2 above."
- (4)"As appropriate, discuss considerations for scarcity, abundance, irreplaceability, and/or uniqueness. Also discuss the geographic area of consideration associated with these characteristics."

Reference: 501 FW 2, Appendix 2 Checklist-Resource Category Documentation


Signature
Printed Name: Vera Clarke
Address: PO Box K, Pilot Rock, OR 97868



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) Terry L. Clarke

Mailing Address (mandatory) 1325 NW Horn
Pendleton, OR 97801

Phone Number (optional) () Email Address (optional) terry@pioneerorphanettinc.com

Today's Date: 6/26/19

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 Tardaeether, 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.)

Page 62	Page 64
<p>1 August 22nd, 5 p.m. Pacific Daylight Time, I think. 2 Unless it's Standard Time, but I believe it's Daylight 3 Time at this time of year. 4 One last opportunity for anybody to give 5 comment this evening. I don't know, do we want to -- we 6 will plan to stay around in case somebody comes in later 7 and wants to give comment. But we will go into recess 8 now until somebody comes in, if they do. 9 It is 6:24 p.m. We are in recess. 10 (Recess taken.) 11 HEARING OFFICER WEBSTER: It's 7:27. We are 12 reconvening for another member of the public to give 13 public comment. 14 If you would hand me your form there. 15 MR. ED MILTENBERGER: I haven't filled it out. 16 HEARING OFFICER WEBSTER: You can do it 17 verbally. If you would state your name and your 18 address, please. 19 MR. ED MILTENBERGER: Ed Miltenberger, 803 20 Southwest Court, Pendleton, Oregon. That's my mailing 21 address. The property is, we are located out in the 22 Gerdain [ph] District. My concern, is that where I 23 should start? 24 HEARING OFFICER WEBSTER: Yeah. What issues 25 did you want to raise about the B2H draft proposed</p>	<p>1 erosion in a place where erosion really doesn't occur 2 because it is kind of on the knoll of a hill that 3 provides access to this road that is proposed into that 4 property. 5 HEARING OFFICER WEBSTER: Just to clarify, 6 it's a road that they are going to use as an access road 7 or is it going to be -- 8 MR. EDWARD MILTENBERGER: Yeah, it is on the 9 plat, as an aerial plat of it. I see how it would 10 service probably three towers. So if there is any 11 activity in inspecting the towers in the future or just 12 setting them all up, it's going to be pretty hard on 13 this piece of property because it's so sparsely 14 vegetated. The grass out there is pretty fragile. 15 That's kind of what I'm looking out for is 16 that I don't get a runoff problem. It just winds up in 17 the middle of a ravine below it. 18 CHAIRMAN BEYELER: How large an acreage is it? 19 MR. ED MILTENBERGER: 380 acres. 20 CHAIRMAN BEYELER: Okay. So that's part of 21 the section. 22 HEARING OFFICER WEBSTER: Anything else you 23 want to bring up? 24 MR. ED MILTENBERGER: Not at this time, unless 25 there is -- I would be open to the idea of an improved</p>
Page 63	Page 65
<p>1 order? 2 MR. ED MILTENBERGER: The issue I want to 3 bring up is just to state here that I'm concerned with 4 the fragile depth of the soil and the traffic across it 5 and the terrain steepness and the topographical outlay, 6 that it's going to be pretty hard on that piece of 7 property. 8 I know I avoid the "trail," as you might call 9 it, and I see they have listed it as a "road." It's 10 really not much of a road because the only thing they 11 use it for is servicing the springs up on top. And I 12 try to stay off of it as much as I can, so as light of 13 traffic as possible because it's so steep. There is 14 some parts of it that stay pretty wet and it tears it up 15 pretty bad. 16 Like I said, the soil is real fragile. The 17 grass that is on it is less than in 2 inches of soil, 18 and I know it takes more than 2 years for some of it to 19 come back in the tracks that I've laid. 20 So with that in mind, the runoff in the spring 21 is terrible up there because we do get a lot of snow, 22 and it stays on pretty good. But when it comes off, you 23 can tell by these ravines in the map, that, boy, there 24 are really torrents that come down out of there. 25 This road is a testimony to a great amount of</p>	<p>1 road on the property, but not so much. It's like 2 unpredictable to say that any road up there as a 3 permanent access would do that property any good at all. 4 And if it winds up that way, I would want to be 5 compensated for the upkeep of the road and the 6 preparation to keep it from turning into a complete 7 runoff thing, or someone should be responsible for the 8 terrain. 9 HEARING OFFICER WEBSTER: Thank you. 10 MR. ED MILTENBERGER: That's about it. 11 HEARING OFFICER WEBSTER: It's 7:32 and we are 12 back in recess. 13 (Recess taken.) 14 HEARING OFFICER WEBSTER: We are reconvening 15 again. We have another member of the public who wants 16 the opportunity to comment. It is 7:50. We are going 17 to hear from Terry L. Clarke. 18 HEARING OFFICER WEBSTER: If you would state 19 your name and your address for the record. 20 MR. TERRY L. CLARKE: I'm Terry L. Clarke, 21 1325 Northwest Horn, Pendleton, Oregon. 22 I also represent TJL Ranch, one of the 23 properties impacted by this proposed line. 24 So what I wanted to get on the record is that 25 we object to this, the construction of this line,</p>

Page 66

1 especially as it pertains to shipping power out of
2 state. It's been our feeling that the Oregonians have
3 paid for part of this project, for the construction of
4 the windmills with our tax credits and all the incentive
5 programs that we have had, and in doing so, I think we
6 are short-circuiting ourselves. We have got a lot of
7 new industry in the area with Amazon and what is
8 happening with the ports, I think that power can be used
9 here.

10 I think if the Siting Council allowed the
11 construction of those windmills originally with the onus
12 that there was adequate transmission lines in the area
13 to take care of those, then the mistake is either then
14 in allowing them to be constructed or now in allowing
15 the power to be removed from the area. So I think this
16 power belongs to Oregonians first.

17 As far as the impact to our properties, we see
18 it's a grazing area that we've had for over -- we've
19 been there over 50 years. The property has been used
20 for grazing forever. I think the impact, allowing
21 additional people and structure in the area has a
22 negative impact to us, both from the view scape as well
23 as the use of the property. I don't think all of the
24 impacts have been properly addressed at this point.

25 If someone could show us in the future that

Page 67

1 all the environmental concerns would be addressed and
2 that we could maintain our view scape without any kind
3 of adverse impact, then we might consider it. But at
4 this point we wish to go on the record as objecting.

5 HEARING OFFICER WEBSTER: All right. Thank
6 you.

7 MR. TERRY L. CLARKE: You are welcome.

8 HEARING OFFICER WEBSTER: There is no Council
9 members here to ask questions; so I think we will
10 just -- is there anything else you want to add?

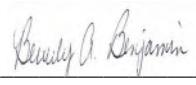
11 MR. TYLER L. CLARK: No. I just am really
12 concerned with in siting these originally, because
13 windmills are so localized. There is wind in Idaho,
14 there is wind in Washington, there is wind everywhere.
15 Why would we build them here to take transmission lines
16 to go 200 miles east to tie to something else. It
17 doesn't make any sense. The windmills could have been
18 there. They could have saved billions of dollars. This
19 wouldn't even be an issue.

20 HEARING OFFICER WEBSTER: Mr. Clarke, thank
21 you.

22 MR. TERRY L. CLARK: You are welcome.
23 (Hearing concluded at 7:54 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 10th day of July 2019.
16
17
18
19
20
21
22
23
24
25



BEVERLY A. BENJAMIN, CSR 710
Notary Public
P.O. Box 2636
Boise, Idaho 83701-2636

1112 1/2 Adams Ave
La Grande, OR 97850

RECEIVED
17 AUG 2019 PM
U.S. POSTAL SERVICE



Energy Facility Siting Counsel

Attn: V. Tardawatha

Oregon Dept. of Energy
550 Capitol St., NE

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Salem OR 97304-3742

August 10, 2019

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

Vial 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:

Regarding the Boardman to Hemingway Transmission Project, the monitoring of noise to establish baseline noise levels failed to comply with the requirements of OAR 340-035-0035(3)(b). This rule establishes the location and procedure for completing sound measurements as listed in the Sound Measurement Procedures Manual 1. The location is specifically described as the further point from the noise source between a point 25 feet toward the noise source from the noise sensitive building or the point on the property line nearest the noise source.

Idaho Power ignored the specific procedural requirements for establishing a baseline noise level in several ways:

1. They placed measuring points “representative of the house and yard accommodations.” Measuring points were placed “in similar surroundings experiencing the same weather and acoustic conditions of where a resident was expected to spend the majority of time when outdoors,” or they were placed to accommodate the homeowner’s request. (See 3.2, Page 7 of Attachment X-2, Baseline Sound Survey) The procedure for doing noise monitoring to establish baseline very specifically defines where the monitoring equipment is to be placed in relation to the noise sensitive property. Note that on Page 549, line 16 through 24 of the Draft Proposed Order states that the monitoring positions were 25 feet toward the source. This is not what the developer says. In fact, by changing the measurement point or using measurements from one residence to assume sound level at others makes all the measurements invalid that was not performed at the stated location for each residence. On page 7 of the Attachment X-3, Supplemental Baseline Sound Survey for the Tub Mountain, Burnt River, and East of Bombing Range Road Alternate Corridors, the developer states, “MPs were placed in similar surroundings experiencing the same weather and acoustic conditions to where a resident was expected to spend the majority of time when outdoors. However, some property owners voiced opinions and preferences on the exact locations of the MP on their properties.” No reliable results can be obtained when the individual(s) doing the monitoring do not adhere to the strict protocol used to complete the monitoring.
2. When modeling results showed a “potential for increasing sound levels by 10 dBA or less,” the developer assumed compliance with the ambient degradation standard and did not complete testing to determine baseline sound levels. (Page 5, Line 24 of Attachment X-2, Baseline Sound Survey) This did not provide for any margin of error as any level over 10 dBA would be an exceedance of the standard. The developer failed to apply a reasonable margin of error, which would have resulted in doing measurements for any residence predicted to have an increased sound level of 8 dBA to allow for 95% reliability. See attachment “Uncertainty of LDEN Calculation for corona noise from Ultra High Voltage power lines using reference methods” by T. Wszolek, AGH University of Science and Technology, Department of Mechanics and Vibroacoustics. September 30, 2006.

3. The practice of using a baseline sound measurement at a single monitoring point to represent a group of nearby noise sensitive properties is unacceptable. The developer stated that "due to the large number of NSRs identified within the analysis area, it was not feasible to conduct baseline monitoring at every individual noise sensitive property." (Page 5, Line 36, Attachment X-2, Baseline Sound Survey.) The noise rules do not require noise monitoring. They do state the methods that are to be used to establish baseline noise levels in the event the developer chooses to do actual noise measurements. The developer had the option and could have taken it to use the standard assumed 26 dBA for any noise sensitive property they were not able to monitor per the prescribed methods for any reason.
4. The only monitoring results which should have been used to establish a baseline noise level other than the standard should have been the 22 measuring points which performed during the entire monitoring period, assuming they were placed at a location as described in OAR 340-035-0035(3)(b). Locations, where baseline modeling was not completed per the DEQ protocol, need to use the assumed baseline sound measurement. Instead, the developer used the measurements from one residence to establish what they thought it would be at another; they averaged the results from MP 13 and MP 16 to guess at the measurement at MO 15. These MP's were located roughly 5 miles in different directions from MP 13 and MP 16. See description on page 8, lines 17 through 26, Attachment X-2, Baseline Sound Survey, for an example of the shoddy methods used to complete the monitoring, which clearly would not hold up under peer review.
5. While the developer makes several references to the methodology used in the Big Eddy Knight transmission line EIS, the final outcome regarding noise was that the developer would not be allowed to exceed the noise standard.

Idaho Power failed to follow the methodology for establishing a baseline noise level required by OAR 340-035-0035 or use the assumed baseline noise level resulting in the establishment of flawed baseline noise levels. None of the results of the noise modeling can be assumed to be accurate as a result. All material needs to be corrected and resubmitted.

No site certificate can be issued due to the lack of compliance with the noise monitoring protocol.

Sincerely,



Signature

Printed Name: Karen Cloy

Mailing Address: 904 I Ave
La Grande OR 97850

1112 1/2 Adams Ave
La Grande, OR 97850

RECEIVED
17 AUG 2019 PM
U.S. POSTAL SERVICE



Energy Facility Siting Counsel

Attn: V. Tardawatha

Oregon Dept. of Energy
550 Capitol St., NE

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Salem OR 97304-3742

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:

Steve Cloud
910 12th St
La Grande OR 97850

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,



Name Anna Collins
Address 802 Washington Ave
La Grande OR 97850

E.2 Landslide Descriptions

E.2.4 SLIDO 10; Sheet 6

"SLIDO 10 is referenced at a scale of 1:100,000 (Buss, 2006), and it's located over 2,000 feet southwest of the IPC Proposed Route, near tower 96/3. It is mapped as talus/colluvium and will not likely impact the proposed alignment or any associated work areas or multi-use areas. A field reconnaissance of this area 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 **Drill sites 96/4; 96/5; 97/1** is within a mile of the heavily traveled I84 transportation/utility corridor. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site Drill sites 96/4; 96/5; 97/1, and its vicinity, represent a significant risk of several possible adverse effects. This area characterized by steep slopes and hazardous snow melts should be removed for consideration as a site for a transmission "facility". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed 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.

Name:

Anne Collins

Anne Collins

Address:

*806 Washington Ave
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.

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.

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* 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.

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

August 10, 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 96/4, 96/5 and 97/1 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 345-022-0020 Structural Standard:

"(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(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 96/4, 96/5, 97/1 is shown and described on the following tables

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5809AO; 5836AO; erosion hazard; rock outcrop, percent of slope Low; 2: High; 15. (sheet 3 and 4 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

96/4 – General

96/5 – Angle change along alignment

97/1 – Angle change along alignment

E.2 Landslide Descriptions

E.2.4 SLIDO 10; Sheet 6

“SLIDO 10 is referenced at a scale of 1:100,000 (Buss, 2006), and it’s located over 2,000 feet southwest of the IPC Proposed Route, near tower 96/3. It is mapped as talus/colluvium and will not likely impact the proposed alignment or any associated work areas or multi-use areas. A field reconnaissance of this area should be performed as part of the geotechnical exploration program.”

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.

345-022-000 (2)(D) states the the IPC's ASC must describe "The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...** Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes." ASC, page H-12.

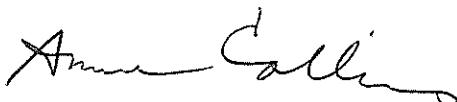
There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to the heavily traveled I84 transportation/utility corridor, the Hilgard Junction State Recreation Area and the Grande Ronde river. Further study and subsequent intrusive 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:

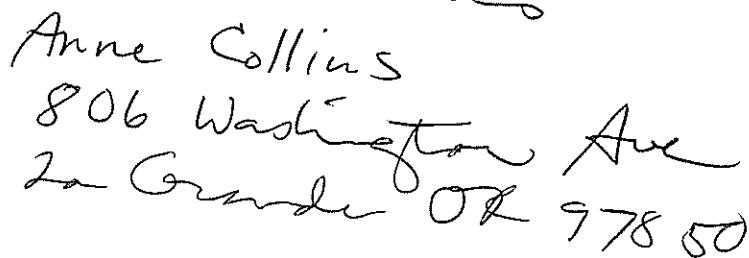
Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. "The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment 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.

Commenter signature:



Address:



Anne Collins
806 Washington Ave
La Grande OR 97850

August 10, 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 94/4 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 345-022-0020 Structural Standard:

"(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(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 94/4** is shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

Drill sites 94/4 is 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:

5830 BO; erosion hazard; severe, rock outcrop; percent of slope Low; 15: High; 30. (sheet 4 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 35

94/4 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard

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 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.

345-022-000 (2)(D) states the IPC's ASC must describe "The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...** Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes." ASC, page H-12.

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.

Commenter signature:

Address:

Anne Collins

References:

*806 Washington Ave
La Grande OR 97850*

August 10, 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 103/3 and 103/4 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 345-022-0020 Structural Standard:

“(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(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 103/3 and 103/4** is shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

Soils; Map page 20 of 44:

Table B3: Soil Descriptions, described as:

18E, erosion hazard; severe; 61E; erosion hazard; severe, percent of slope Low; 5: High; 40.
(sheet 1 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 39

103/3 – Slope Stability/ Geo-Seismic Hazard

E.2 Landslide Descriptions

SLIDO-3.4 FernML2010_129

Northing: 5019127 Easting: 407892 Sheet 9

"SLIDO 129 is referenced at a scale of 1:100,000 (ferns et al., 2010) and its mapped extents intersect the IPC Proposed Route, between 103/3 and 103/4. This slide appears to be contained within a drainage spanned by the two towers and it therefore unlikely to affect the proposed work areas. A field reconnaissance of this area should be performed as part of the geotechnical exploration program."

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.

345-022-000 (2)(D) states the IPC's ASC must describe "The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...**" Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes." ASC, page H-12.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area. Further study and subsequent intrusive construction will not reduce the risks to 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 a populated area.

Commenter signature:

*Anne Collins
806 Washington Ave
La Grande OR*

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:

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 $\frac{1}{2}$ 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.

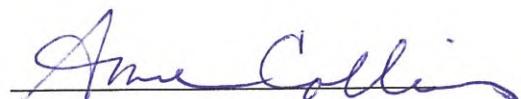
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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

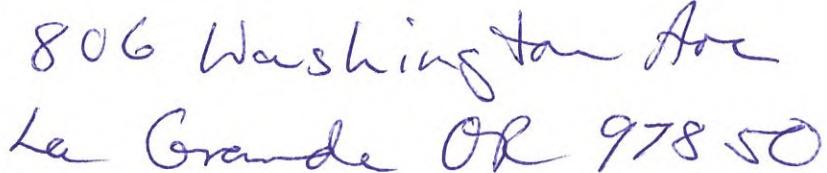
well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

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: 

Mailing Address: 

ESTERSON Sarah * ODOE

From: Anne Collins <annecollins47@yahoo.com>
Sent: Thursday, August 22, 2019 3:15 PM
To: B2H DPOComments * ODOE
Cc: Fuji Kreider
Subject: Comment letter Re: unsafe spacing of towers
Attachments: commentltrseismicgeneral.docx

Thank you for your careful attention to this matter. Anne Collins

Sent from [Mail](#) for Windows 10



Virus-free. www.avg.com

August 10, 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.: **Unsafe siting of drill sites adjacent to the City of La Grande 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 local area residents.

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

“(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(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.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. IPC relies on DOGAMI's assurance that “4) You (DOGAMI) were aware that in transmission line construction, **design for wind and ice forces is more than sufficient to account for typical seismic forces**”,(IPC letter to DOGAMI dated 17 December 2012 and included in the ASC, summarizing a meeting in 2011). This refers to the American Society of Civil Engineers (ASCE) Guidelines for Electrical Transmission Line Structural Loading (Wong and Miller 2010), which further states, **“This may not be the case if the transmission structure is partially erected or if the foundations fail due to earth fracture or liquefaction.”**, Page H-10, ASC.

345-022-000 (2)(D) states the IPC's ASC must describe..."The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC has presented a letter to DOGAMI summarizing a meeting in 2011. IPC's "desktop geology report presents... the seismic hazards that could affect the project". What follows in Exhibit H-I follows is already established data: "The conclusions and recommendations contained in this report are based primarily on available published information, with very limited field reconnaissance."

Table B-8. Proposed Route Structure, page B-50 proposes that the Distance Between Structures (ft) of the 500-kV Single-Circuit lattice Steel Structure would be 1,200-1,800 feet. Here is how the data in Exhibit H presented for one of the routes that traverses the entire south side of the city including the hill the Grande Ronde Regional Hospital, a critical access hospital, rests upon.

Tower 101/1 to 103/3: More than two miles between towers.

101/1 Soil is 40C – Moderate erosion, 7.3 ph Construction requires truck or track; straddles SLIDO 134

103/3 Soil is 18E – Severe erosion, 7.8 ph 5-40% slope; on the edge of SLIDO 129. Requires track construction.

Tower 106/3 to 110/2: approximately four miles straddling an earthquake fault.

106/3 Soil is 56F – Severe erosion, 7.3 ph 35-700% slope, crossing SLIDO 380 and directly above another landslide documented by Schlicher & Dean, 1971. Table C-1 Proposed Borings cites Angle change, slope and geologic hazard. Requires track or platform construction.

110/2 Soil is 56E – Severe erosion. 7.3 ph 35-70% slope, Table C-1 cites angle, slope, geo-hazard and fault crossing. Requires track construction.

Tower 110/3 to 112/4: approximately two miles.

110/3 Soil is 56F – Severe erosion. 7.3 ph 35-70% slope, Table C-1: slope and geo-hazard. Requires track construction.

112/4 Soil is 56E – Severe erosion. 7.3 ph, 7-35% slope, Requires track construction.

Tower 117/2 to 120/3: approximately three miles.

117/2 Soil is 18E – Severe erosion. 7.8 ph, 5-40 % slope, requires track

120/3 Soil is 17E – Severe erosion. 7.8 ph, 20-40% slope, requires track construction, cites angle change, highway crossing and utility crossing.

Are towers missing from Table C1: Summary of Proposed Borings? Is IPC having problems locating towers at many points on this route due to the delicate crust of the earth in the foothills above the City of La Grande? Because the IPC failed to include all the towers on this route meeting their estimate of spacing between towers, 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. This is not a route that provide corridor stability as a backup to the Western Oregon energy corridors. Approving this corridor just puts another utility infrastructure asset at risk of seismic hazard.

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to a populated area on unstable slopes and over earthquake faults.

Anne Collins, M.A., M.L.I.S., retired librarian

806 Washington Ave, 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.

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.

Schlicker, H. G. and Deacon R. J. 1971 Engineering Geology of the La Grande Area, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open File Report O-1971-03, 16 p., 1 plate, scale 1:24,000.

State of Oregon Department of Geology and Mineral Industries; Publications Center;
<http://www.oregongeology.org/pubs>.

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.

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.

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* 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.

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

August 10, 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: Soil Protection - Drill site 108/3; 109/2 and its vicinity on unstable and steep slopes

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground.

The applicable standard is: OAR 345-022-0022. (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 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc.

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 108/3 and 109/2 and vicinity** is shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

E.2.9 SLIDO 380,33

SLIDO-3.4 FernML2010_380 Northing 5016237 Easting 414116 Sheets 11,12

SLIDO-3.4-WalkGW2002_33 Northing 5016237 Easting 414116 Sheets 11,12

"SLIDO 380 and 33 appear to refer to the same landslide feature and are referenced at scales of 1:100,000 and 1:500,000, respectively (Ferns et al., 2010; Walker, 2002). The IPC Proposed Route crosses the mapped limits of the slide between towers 108/2 and 109/2, and may affect stability at towers 108/3 through 109/2, along with the associated work areas. Schlicker and Deacon (1971) mapped slightly different extents of the same features at a scale of 1:24,000. In the Schlicker and Deacon (1971) map, the extents of one slide area are about 650 feet southeast of tower 107/4 and 465

feet northeast of tower 107/5. A field reconnaissance of these areas 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.*"

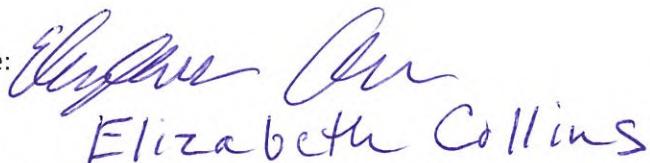
Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the Winter storms and the Spring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

The area surrounding **Drill sites 108/3; 109/2** and the vicinity adds a hazard of unknown proportions to a populated area with a delicate earth crust. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site Drill sites 108/3; 109/2, and its vicinity, represent a significant risk of several possible adverse effects. This area characterized by steep slopes and hazardous snow melts should be removed for consideration as a site for a transmission "facility". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed 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.

Name: 
Elizabeth Collins
Address: 2109 Third St Apt Q
La Grande, OR 97850

August 10, 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: Soil Protection - Drill site 89/3, 90/1 and 90/2 on unstable and steep slopes

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground. My name is Marcia Collins and I have lived in La Grande for thirty years. I love this valley and the Blue Mountains area.

(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 500kV 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 89/3, 90/1 and 90/2 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 17 of 44:

Table B3: Soil Descriptions, described as:

5856 BO; Erosion hazard – severe: 5856 CO – Erosion hazard - severe

Table C1: Summary of Proposed Borings; Map Sheet 34

89/3 – Angle change along alignment

90/1 – Slope Stability/Landslide; Geo-Seismic Hazard

90/2 – Slope Stability/Landslide; Geo-Seismic Hazard

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 a the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

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". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed 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.

Name:

Marcia Collins

Address:

*1802 3rd St
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.

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.

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* 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.

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

TARDAEWETHER Kellen * ODOE

From: Rebecca Collman <rcollman@icloud.com>
Sent: Saturday, August 17, 2019 8:15 AM
To: B2H DPOComments * ODOE
Subject: B2H

August 17, 2019

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

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:

Yet ANOTHER reason to reject the B2H! PLEASE USE AN ALTERNATE ROUTE.

COMMENT REGARDING THE NOISE DECISION REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Idaho Power did not complete noise monitoring and noise modeling for all ‘Noise Sensitive Properties,’ including my own, in compliance with the Oregon Department of Environmental Quality (ODEQ) regulations, Chapter 340, Division 35 and the ODEQ Sound Measurement Procedures Manual (NPCS 1.)

Idaho Power had a choice for determining the baseline ambient noise measurement: a) use the standard baseline measurement of the ODEQ at 26 dBA; or, b) conduct actual monitoring at the noise sensitive property. Idaho Power stated that due to the large number of NSR’s, identified within the analysis area, it was not feasible to conduct baseline monitoring at every individual noise sensitive property. (Page 5, Line 36 of the Baseline Sound Survey.) (Noise Sensitive Receptor or NSR is also used to refer to noise sensitive property, NSP.)

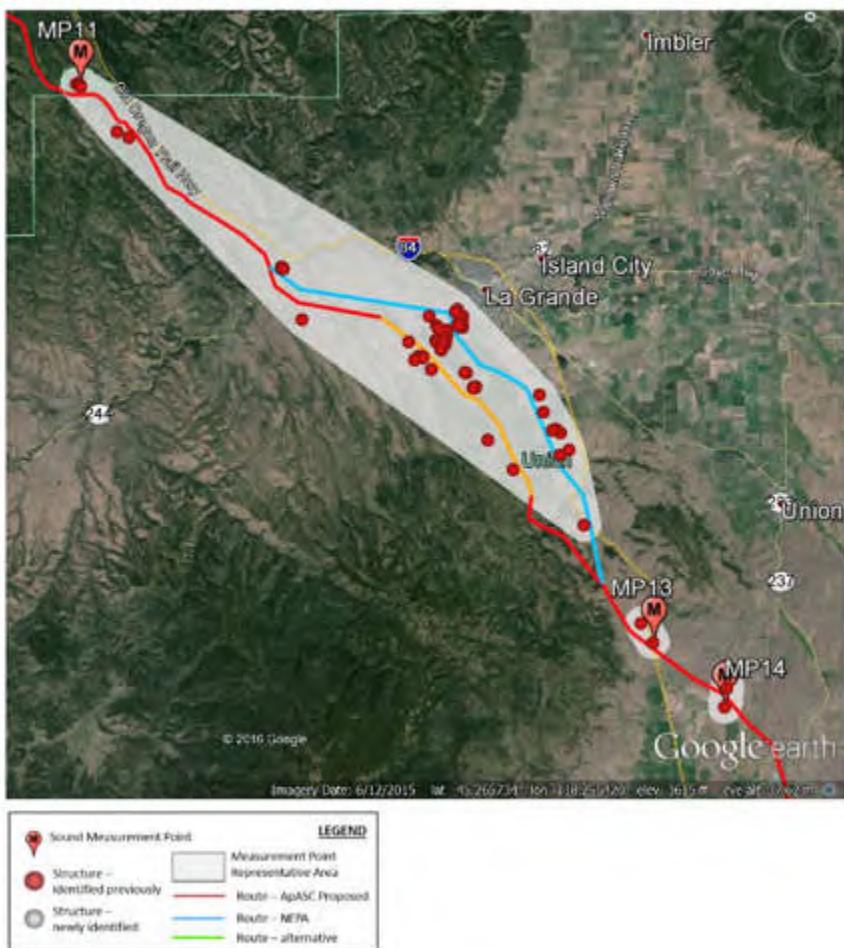
Instead, they placed measuring points “representative of the house and yard accommodations.” Measuring points were placed “in similar surroundings experiencing the same weather and acoustic conditions of where a resident was expected to spend the majority of time when outdoors” or they were placed to accommodate the homeowner’s request. See 3.2, Page 7 of Baseline Sound Survey.

The practice of using a baseline sound measurement at a single monitoring point to represent a group of nearby noise sensitive properties is unacceptable and does not comply with the ODEQ rules and standards. This is why a standard baseline exists. They could have simply followed the ODEQ standard and used 26dBA as a baseline.

Idaho Power attributed noise measurements at a single noise sensitive location to multiple other noise sensitive properties where measurement did not occur based upon a subjective evaluation that the terrain was similar or they were in the reviewer’s estimation close to the property that was actually measured. For example, the measurement for MP 11 was used to establish baseline noise level for a total of 63 noise sensitive properties according to Table 1 listing, in Attachment X-6, ”Monitoring Points representing Noise Sensitive Receptors,” page 2 of the “Technical Memorandum, Ch2M dated April 29, 2016.” Monitoring Position 11 is 207 feet from the Union Pacific Railroad. This alone should preclude any determination that it is consistent with the other locations which do not have a railroad track located this close to them. It thus invalidates all results from the Monitoring Position 11 being used as the baseline noise measurement applied to other noise sensitive receptors, like my home. Please do not contaminate my lovely home and our peaceful valley with the noise emitted from these lines.

Rebecca Collman
61695 Skyline Lane
La Grande, Oregon 97850
541-975-3131

B2H Preliminary: Morgan Lake and Mill Creek Alternatives
Overall view of MP11, MP13, and MP14



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 U2⁹ from the application shows an “Aerial Lift Crane to be Used During Construction” and the Transportation and Traffic Plan on page 19¹⁰ 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
Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

City of La Grande Ordinance Number 3242,
Series 2018
Page 236 of 312

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

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

²The 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.

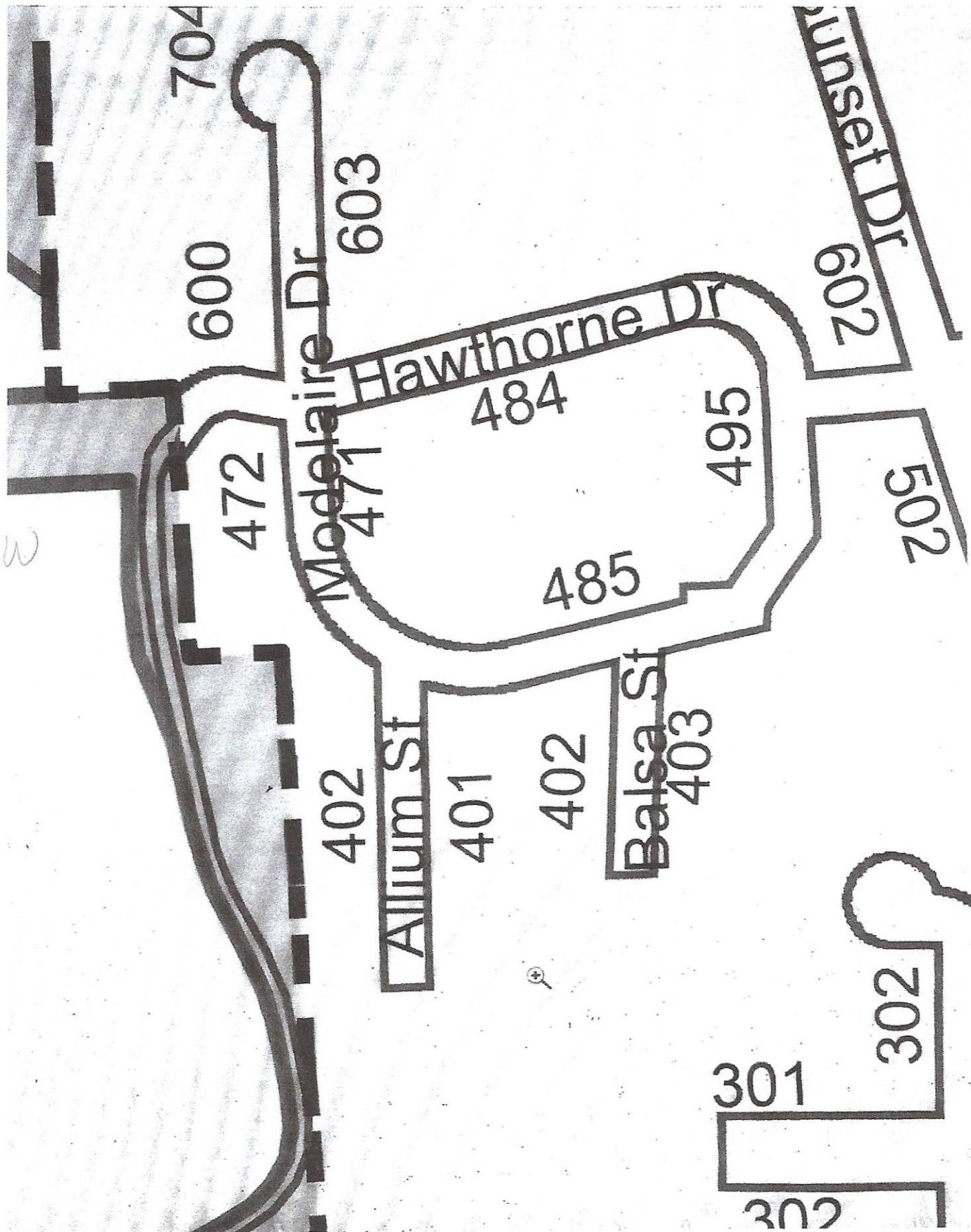
Local Streets: Two (2) travel lanes, parking on one (1) side of street.

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.

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

⁴Bike 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.



Public Services

Exhibit 3

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.



Idaho Power Responses to Comments and Requests for Additional Information on the B2H ApASC

Compiled by ODOE, RA's from the City of La Grande and Responses from IPC

U	U-Public Services	<p>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 for the construction requirements for permits and licenses for uses of the streets that are not normal uses and may result in damages.</p>	<p>proposed helipad is a necessary supporting facility.</p> <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>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.</p> <p>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</p> <p>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</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>

103

IV. CONCLUSIONS

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

106

107

V. ORDER AND CONDITIONS OF APPROVAL

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

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

118

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

132

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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

145

146 s:\planning\land use applications\conditional use permits\2016\02-cup-16 grh-sunset\02-cup-16 decision order.docx



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

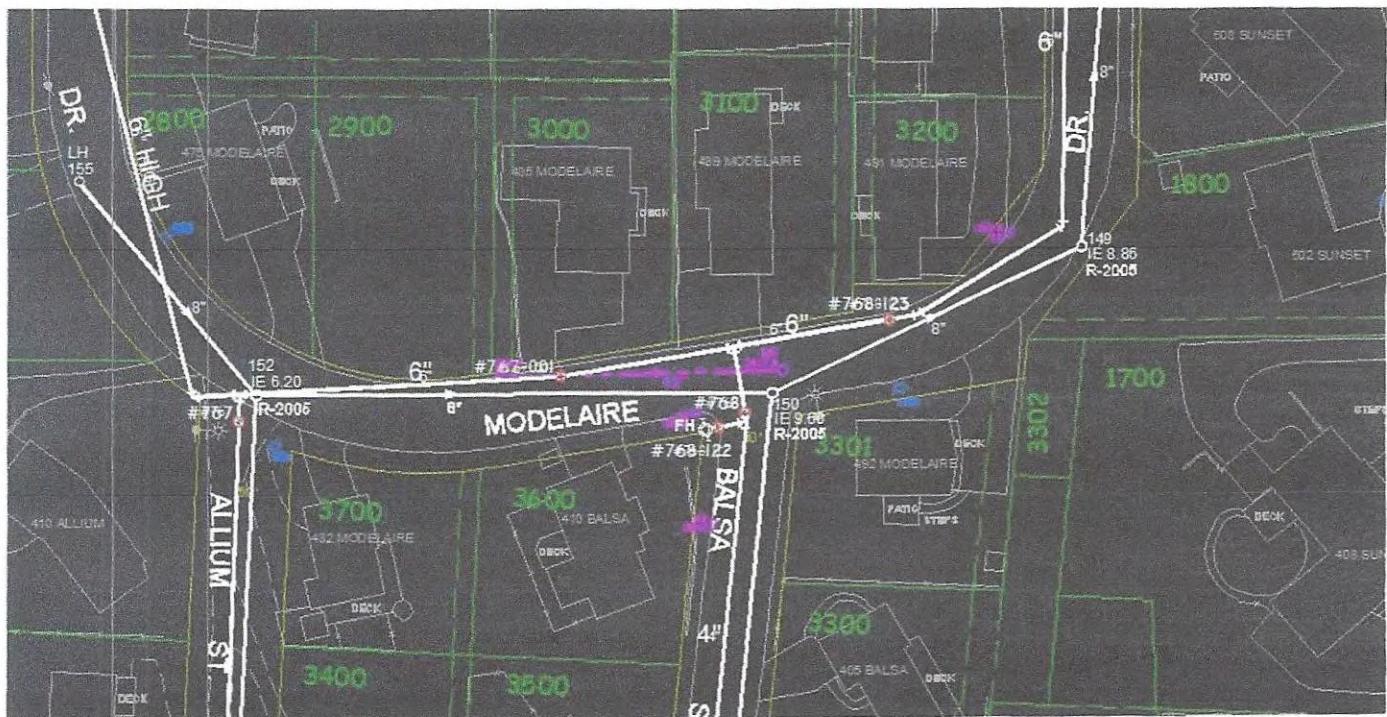
Fax: (541) 963-4844

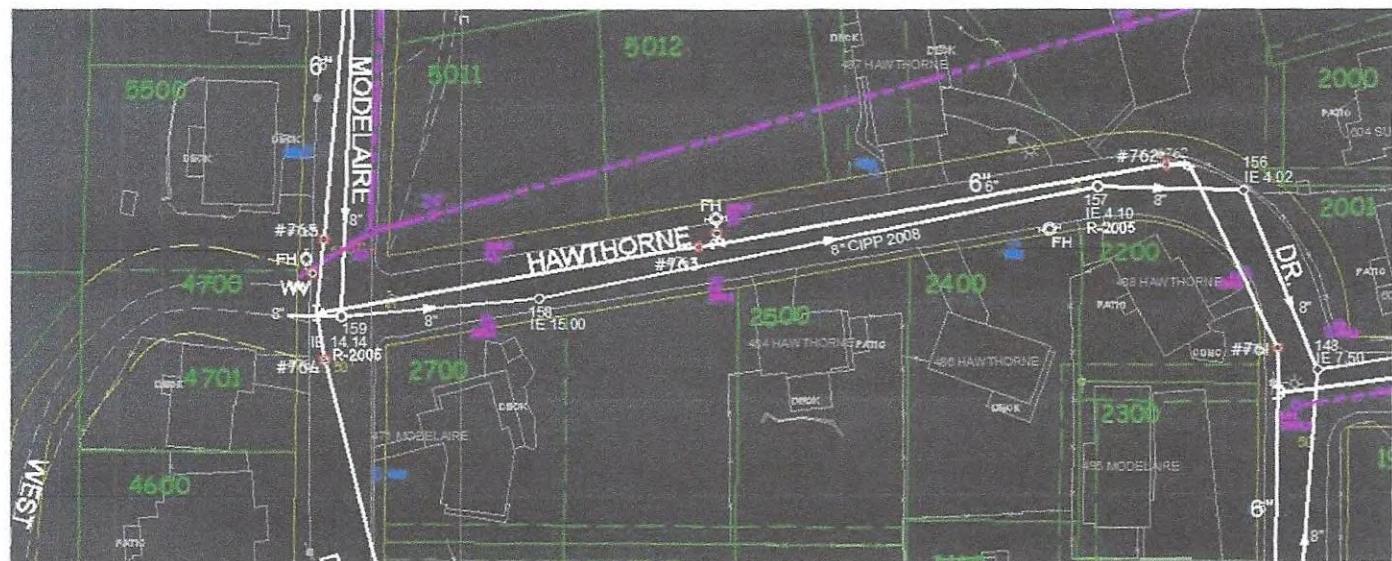
2 attachments



Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

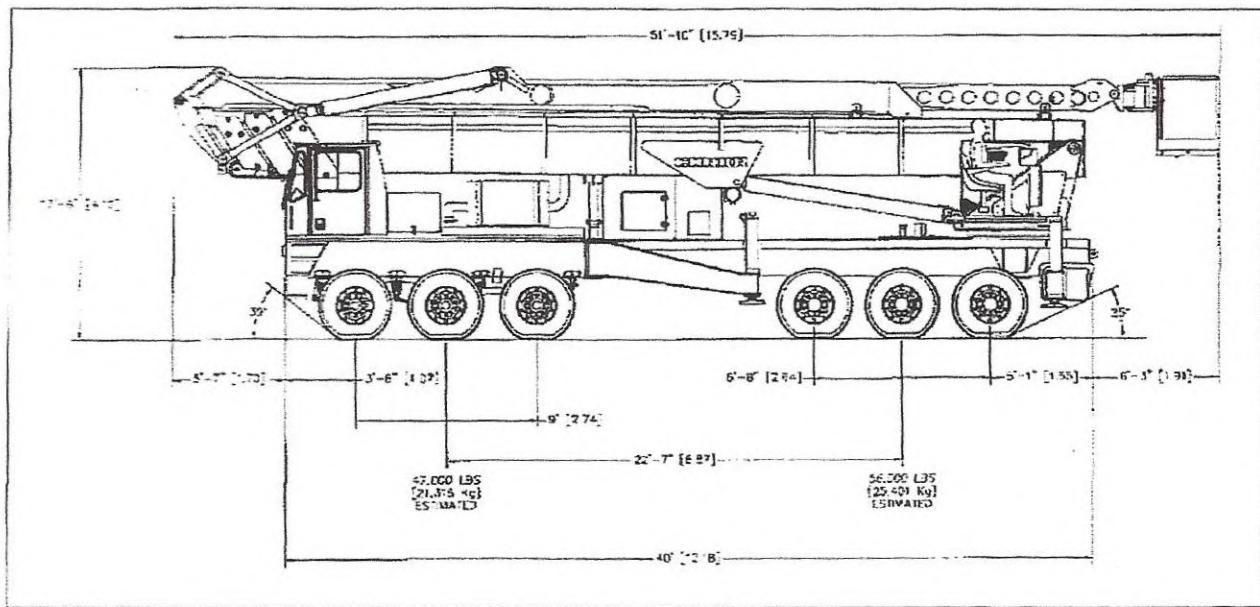


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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-

City of La Grande Ordinance Number 3242,
Series 2018
Page 252 of 312

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

WB-62 [WB-19] DESIGN VEHICLE
RADIUS = 45 ft [13.72 m]
SCALE = 1:20 [1:200]

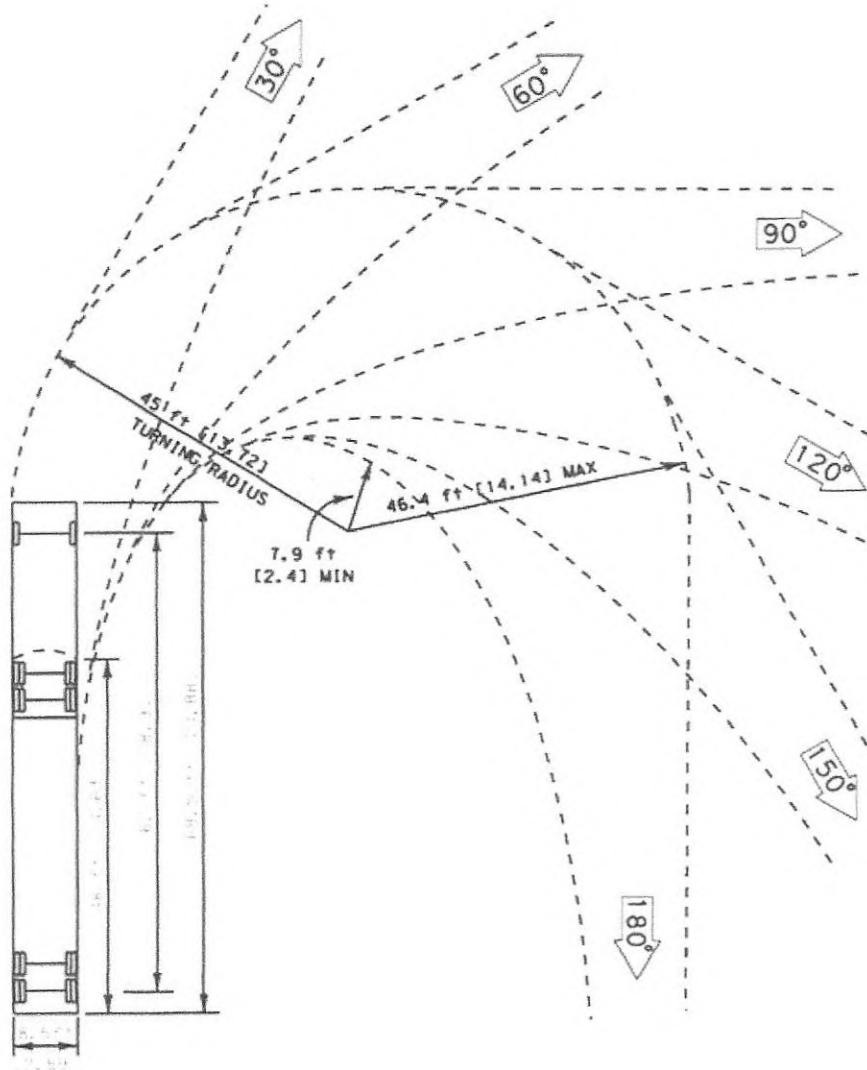
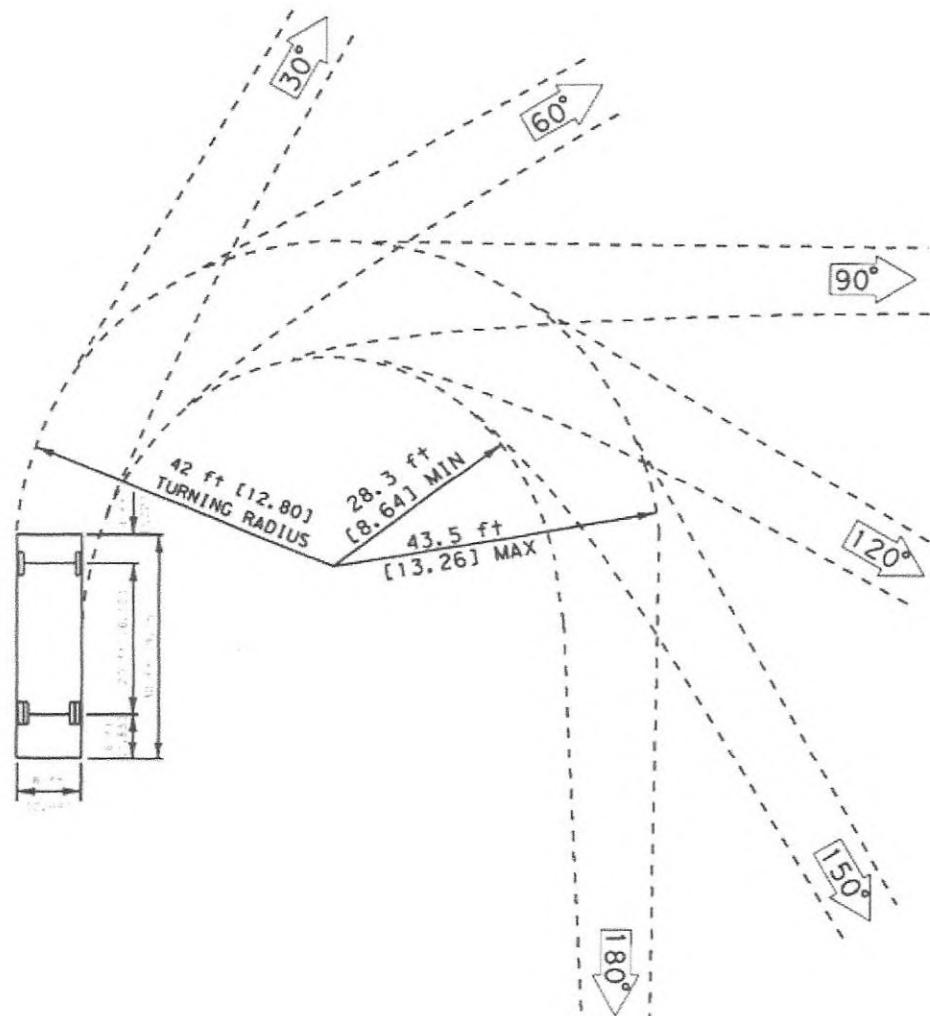


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

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

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

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. Howe II

ADDRESS 482 Modelaire Dr

EMAIL jhowell2@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 475 MODELAIRe DR.

EMAIL bdwaldrop58@gmail.com

SIGNATURE

PRINTED NAME EUSE McILWAIN

ADDRESS 476 MODELAIRe DR.

EMAIL milmil.euse@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

Jessie Huxoll

ADDRESS

472 Modelaire Dr. LaGrande OR 97851

EMAIL

jessiehuxoll@live.com

SIGNATURE

PRINTED NAME

C. Huxoll

ADDRESS

472 Modelaire Dr. LaGrande OR 97851

EMAIL

CHRIS.HUXOLL@EMXEL.COM

SIGNATURE

PRINTED NAME

Jonah Lindeman

ADDRESS

702 Modelaire LaGrande

EMAIL

j.lindeman@rpi.ag

SIGNATURE

PRINTED NAME

Marie Skinner

ADDRESS

208 3rd LaGrande

EMAIL

marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

Blake Bars

ADDRESS

1101 G Ave La Grande

EMAIL

blakebars@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

D. Dale Momman

PRINTED NAME

D. Dale momman

ADDRESS

405 Balsa, La Grande, Or

EMAIL

d momman @ eoni.com

SIGNATURE

Jim K

PRINTED NAME

Jim Kieider

ADDRESS

60346 Marvin Rd
La Grande, OR 97850

EMAIL

jkieider@campblackdog.org

SIGNATURE

Joyde Arritola

PRINTED NAME

JUDIE ARRITOLA

ADDRESS

603 Modelaire LaGrande, Or

EMAIL

JArritola@charter.net

SIGNATURE

Pasco Arritola

PRINTED NAME

PASCO ARRITOLA

ADDRESS

603 Modelaire LaGrande, OR

EMAIL

Pstola @ charter.net

SIGNATURE

John Garlitz

PRINTED NAME

JOHN GARLITZ

ADDRESS

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.

SIGNATURE

PRINTED NAME

Andrea Galzow

ADDRESS

486 Hawthorne DR, LA Grande

EMAIL

foreverfamily33@aol.com

SIGNATURE

PRINTED NAME

Frances E. Lillard

ADDRESS

477 Modelaire Dr. B

EMAIL

SIGNATURE

PRINTED NAME

Brent H. Smith

ADDRESS

410 Allium St

EMAIL

smith.brent@gmail.com

SIGNATURE

PRINTED NAME

M. Jeannette Smith

ADDRESS

410 Allium Street

EMAIL

jeannetteramfon@gmail.com

SIGNATURE

PRINTED NAME

KIMBERLEY HEITSTUMAN

ADDRESS

2409 CENTURY LP, LA GRANDE, OR 97850

EMAIL

Kimheitstuman@hotmail.com

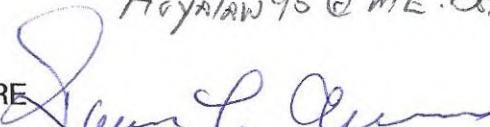
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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 2909 C.M. Ave,

EMAIL Hoytaw95@ME.com

SIGNATURE 

PRINTED NAME

ADDRESS Connie L. Allen 541-9637720

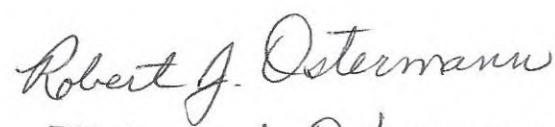
EMAIL 410 Balsa Street La Grande, Oregon 97858
N/A

SIGNATURE 

PRINTED NAME Linda M. Snyder

ADDRESS 491 Modelaire

EMAIL

SIGNATURE 

PRINTED NAME Robert J. Ostermann

ADDRESS 495 Modelaire Dr. La Grande, OR 97850

EMAIL

SIGNATURE 

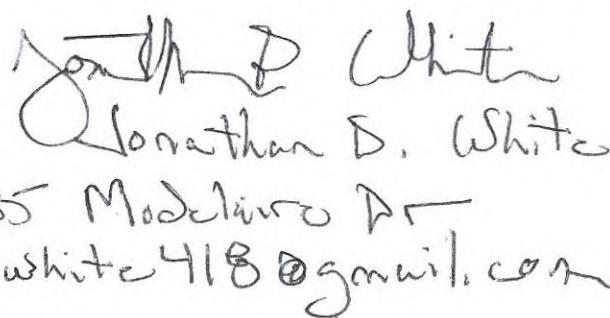
PRINTED NAME Robin J. Ostermann

ADDRESS 495 Modelaire Dr. La Grande, 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.

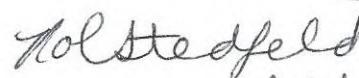
SIGNATURE


Jonathan D. White

PRINTED NAME

ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

SIGNATURE


Robin Stedfeld

PRINTED NAME

ADDRESS 485 Modelaire Dr. La Grande
EMAIL r.stedfeld@yahoo.com

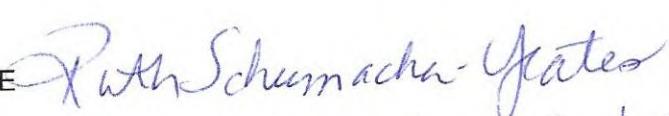
SIGNATURE


Rita Allen

PRINTED NAME

ADDRESS 410 Balsa St. La Grande Or.
EMAIL

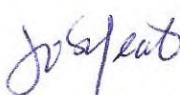
SIGNATURE


Ruth Schumacher Yeates

PRINTED NAME

ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

SIGNATURE


JOHN YEATES

PRINTED NAME

ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

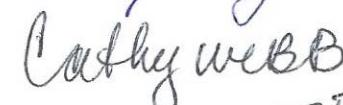
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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

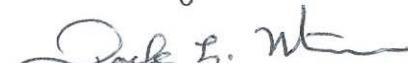
EMAIL loisbarry31@gmail.com

SIGNATURE 

PRINTED NAME CATHY WEBB

ADDRESS 1708 Cedar St. LAGRANGE, OR 97850

EMAIL hunkski@gmail.com

SIGNATURE 

PRINTED NAME Jack L. Martin

ADDRESS 1412 Gilcrest Dr. LaGrande

EMAIL BuffMartin27@Gmail.com

SIGNATURE 

PRINTED NAME GERALDINE BRASETH-PALMER

ADDRESS 1602 Gilcrest DRIVE LA GRANDE, ORE 97850

EMAIL -

SIGNATURE 

PRINTED NAME Jean RAph

ADDRESS 1509 MADISON AVE LaGrande, OR 97850

EMAIL Jraph19@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 Cay Sexton

ADDRESS 401 Balsa Street LaGrande OR 97850

EMAIL Caytris@gmail.com

SIGNATURE 

PRINTED NAME Melinda McGowan

ADDRESS 602 Sunset Dr.

EMAIL melindamcgowan@gmail.com

SIGNATURE 

PRINTED NAME Keith D. Hudson

ADDRESS 605 F Ave, LaGrande OR 97850

EMAIL keith.hudson@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 *Gary D. Pierson*

PRINTED NAME *Gary D. Pierson*

ADDRESS *489 Modelaire Drive, La Grande OR 97850*

EMAIL *-*

SIGNATURE *Lynn Wheeler Duncan*

PRINTED NAME *LYNN WHEELER DUNCAN*

ADDRESS *489 Modelaire Drive, La Grande OR 97850*

EMAIL *v1wd1910@gmail.com*

SIGNATURE *Anne G. Cavinato*

PRINTED NAME *Anne G. Cavinato*

ADDRESS *86 Hawthorne Dr. La Grande, OR 97850*

EMAIL *acavinato@eou.edu*

SIGNATURE *Joe Horst*

PRINTED NAME *JOE HORST*

ADDRESS *86 HAWTHORNE DR. LA GRANDE OR.*

EMAIL *joehorst@eoni.com*

SIGNATURE *Angela Sherer*

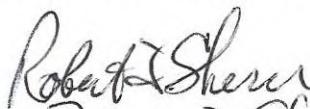
PRINTED NAME *ANGELA Sherer*

ADDRESS *91 N. 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



PRINTED NAME Robert J. Sherer

ADDRESS 97 W Hawthorne Dr, LaGrande, OR 97850

EMAIL asherer@frontier.com

SIGNATURE Heather M. Null

PRINTED NAME Heather M. Null

ADDRESS 492 Modelaire Dr. La Grande, OR 97850

EMAIL hnull@eoni.com

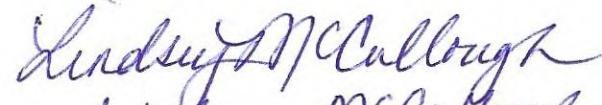
SIGNATURE Bert R. Frewing

PRINTED NAME Bert R. Frewing

ADDRESS 709 South 12th Street LaGrande, OR 97855

EMAIL jeanfrewing@gmail.com

SIGNATURE



PRINTED NAME Lindsey McCullough

ADDRESS 404 Balsa St., La Grande, OR 97850

EMAIL lindz_mm91@hotmail.com

SIGNATURE

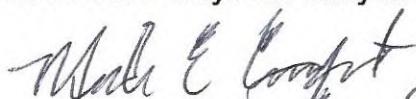
PRINTED NAME

ADDRESS

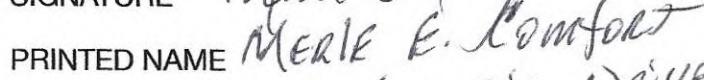
EMAIL

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.

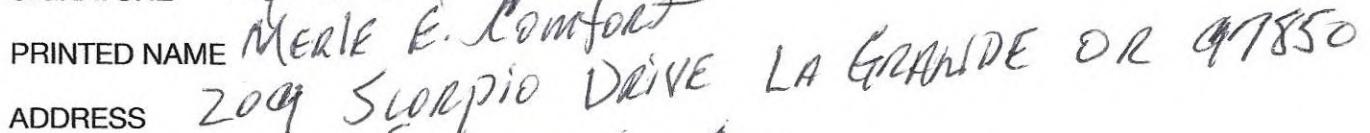
SIGNATURE



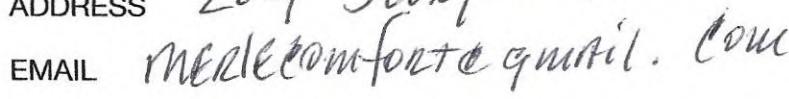
PRINTED NAME



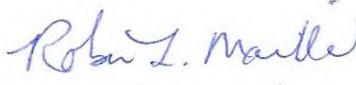
ADDRESS



EMAIL



SIGNATURE



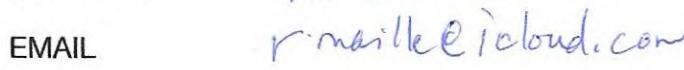
PRINTED NAME



ADDRESS



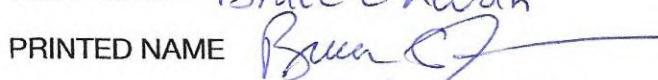
EMAIL



SIGNATURE



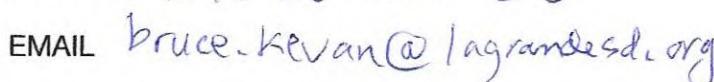
PRINTED NAME



ADDRESS



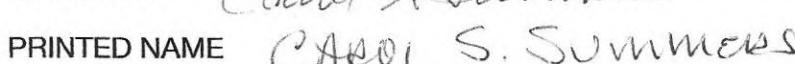
EMAIL



SIGNATURE



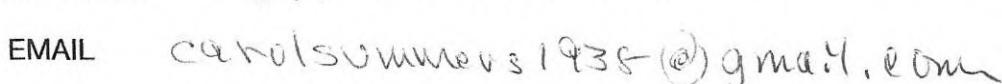
PRINTED NAME



ADDRESS



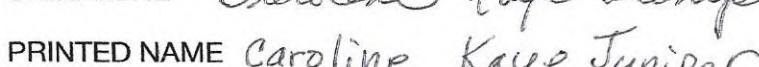
EMAIL



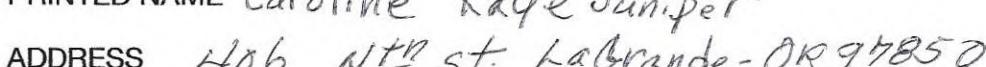
SIGNATURE



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 *Gerald D. Juniper*

PRINTED NAME *Gerald Darwin Juniper*

ADDRESS *406 4th St. LaGrande OR 97850*

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 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

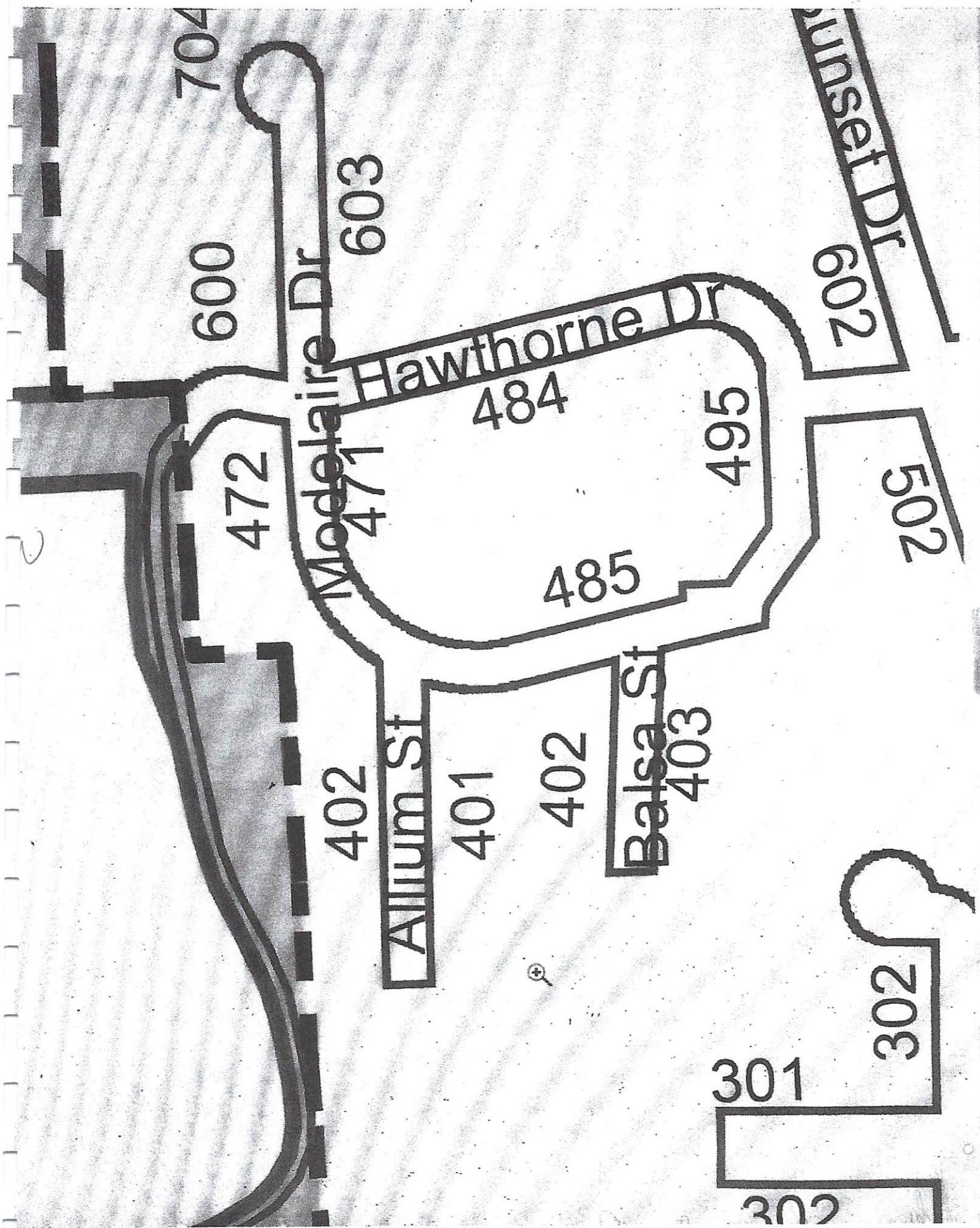
For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation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

Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com



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.



Department of Environmental Quality

[OARD Home](#)[Search Current Rules](#)[Search Filings](#)[Access the Oregon Bulletin](#)[Access the Annual Compilation](#)[FAQ](#)[Rules Coordinator / Rules Writer Login](#)

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;

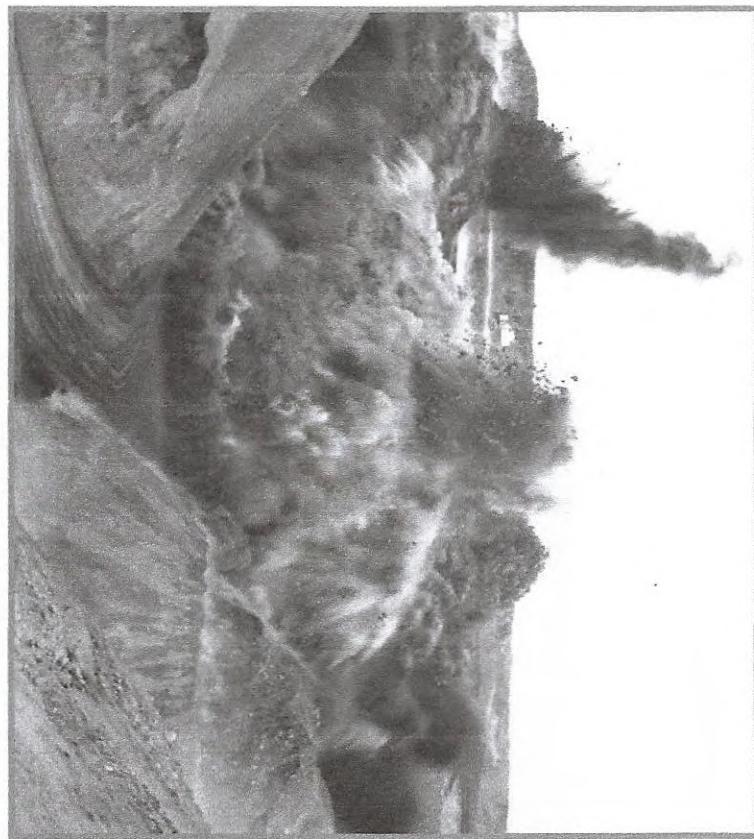
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal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

Controlling the Adverse Effects of Blasting

Exhibit 5a
This module addresses the control of offsite impacts that result from blasting, namely:

- vibrations,
- airblast, and
- flyrock.

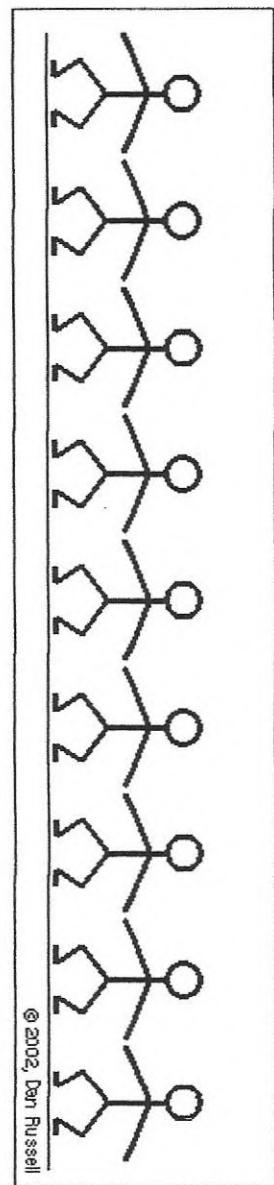
Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying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



Part I: Ground Vibrations, Airblast, and Flyrock

Exhibit 25

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**.



© 2002, Dan Russell

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.

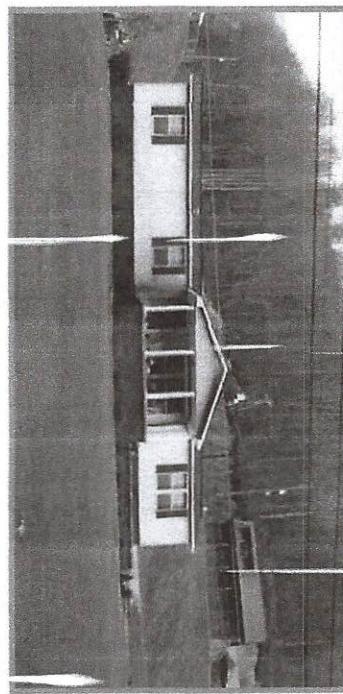
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior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

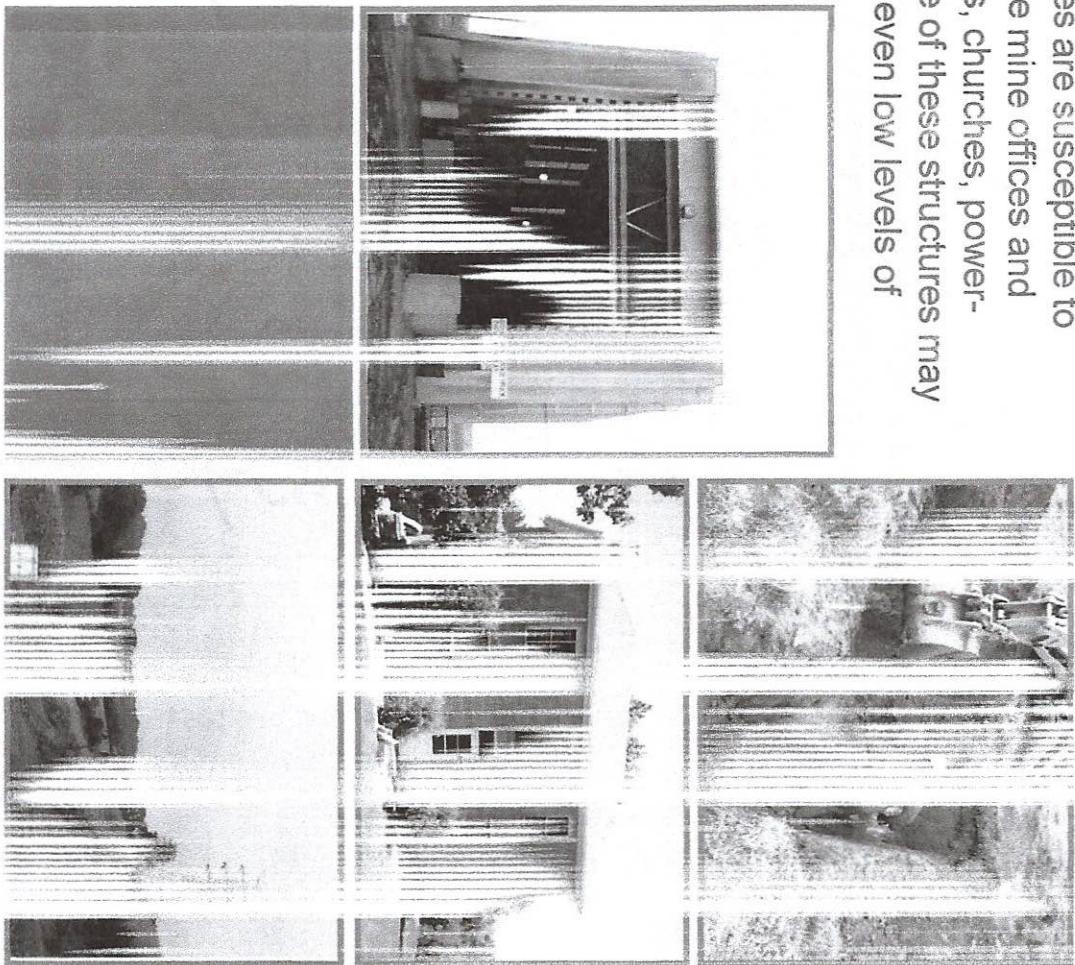
Exhibit 50

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.



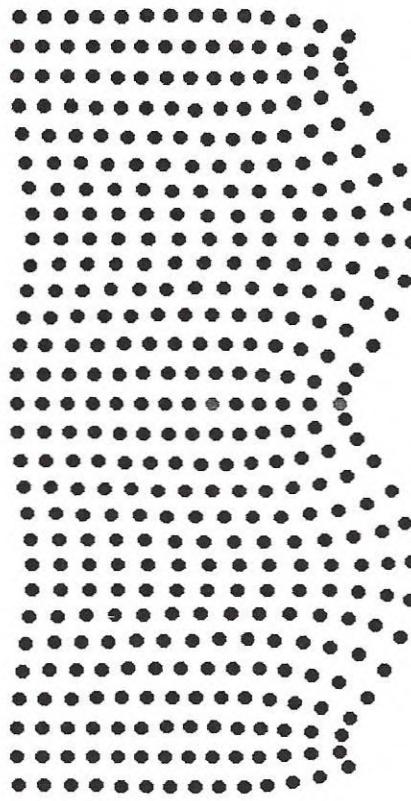
It is important to understand:

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



Ground Vibrations

Exhibit 5d
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.



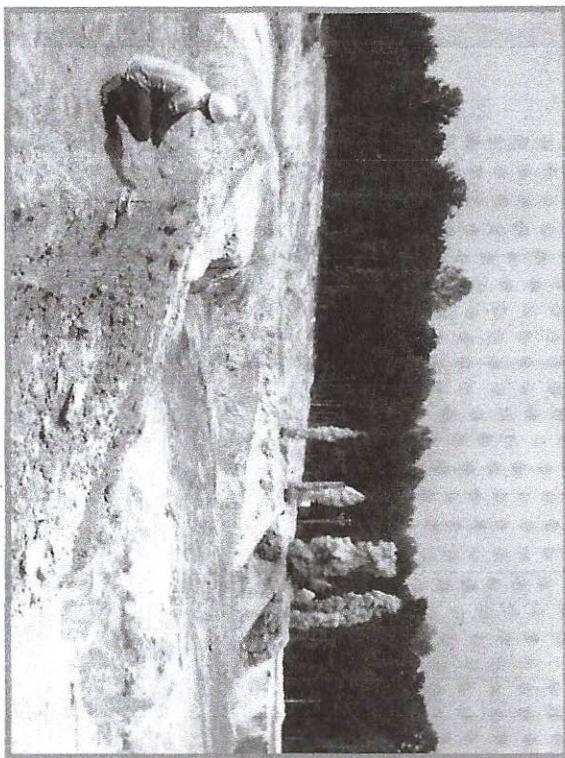
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

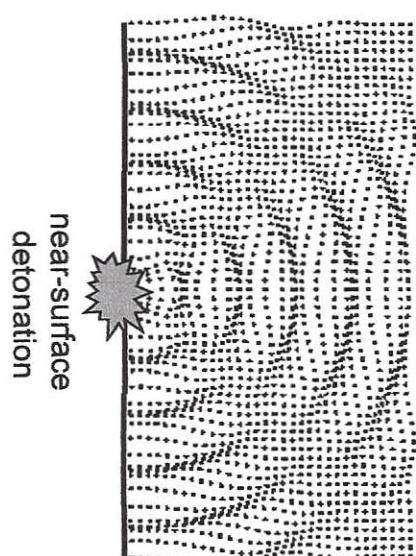
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that may be audible or inaudible. 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

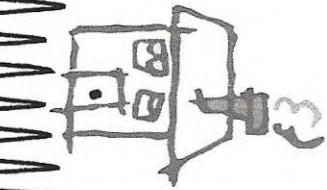
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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



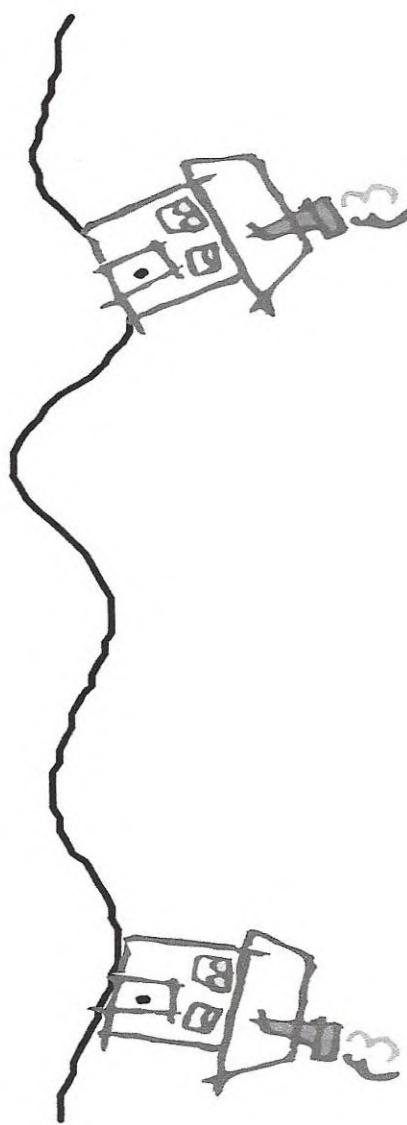
Ground Vibration Structure Response

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.



[HEART
HEALTH](#)[MIND &
MOOD](#)[PAIN](#)[STAYING
HEALTHY](#)[CANCER](#)[DISEASES &
CONDITIONS](#)[MEN'S
HEALTH](#)[WOMEN'S
HEALTH](#)[LICENSING](#)[Pay My Bill »](#)[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

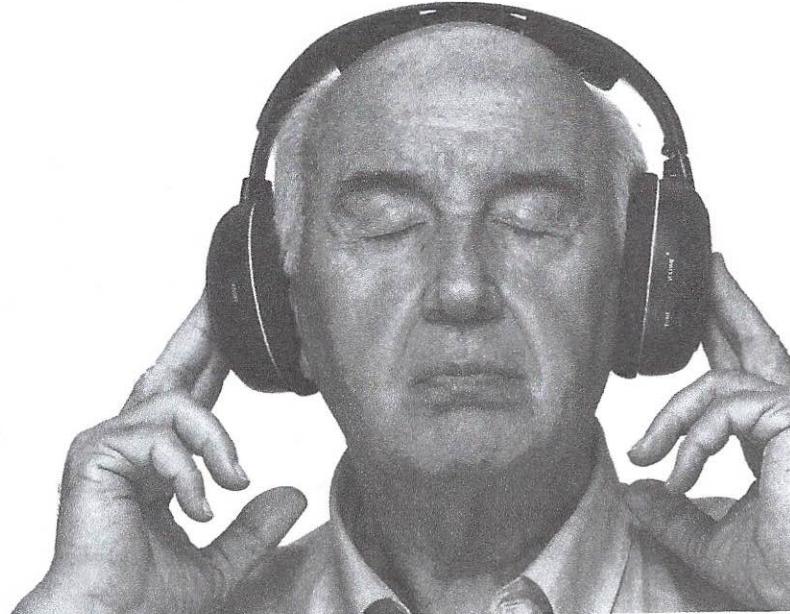


Image: © Juanmonino/Getty Images

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."



UVM Medical Center Blog (<https://medcenterblog.uvmhealth.org>) » Blog (<https://medcenterblog.uvmhealth.org/blog/>) » 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.

[Home](#)[Nursing Education](#)[Nursing News](#)[Featured Stories](#)[Headlines in Health](#)[Clinical Insights](#)[Nursing Career Development](#)[Membership](#)

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 no 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 worker (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 disruption 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 system and 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 sign 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.

References:

- Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise
- Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>
- Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

© 2015 AMN Healthcare, Inc. All Rights Reserved.



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

trauma or flashbacks.



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!

[< Previous article](#)

[Next article >](#)

Related articles





Front Psychol. 2013; 4: 578.

PMCID: PMC3757288

Published online 2013 Aug 30. doi: [10.3389/fpsyg.2013.00578](https://doi.org/10.3389/fpsyg.2013.00578)

PMID: 24009598

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

Maria Klatte, * Kirstin Bergström, and Thomas Lachmann

Center for Cognitive Science, Cognitive and Developmental Psychology Laboratory, University of Kaiserslautern, Kaiserslautern, Germany

Edited by: Nicole Wetzel, University of Leipzig, Germany

Reviewed by: Patrik Sörqvist, University of Gävle, Sweden; Emily M. Elliott, Louisiana State University, USA

*Correspondence: Maria Klatte, Department of Psychology, Cognitive and Developmental Psychology

Laboratory, University of Kaiserslautern, Erwin-Schroedinger-Strasse 57, 67663 Kaiserslautern, Germany e-mail: klatte@rhrk.uni-kl.de

This article was submitted to Developmental Psychology, a section of the journal Frontiers in Psychology.

Received 2013 May 14; Accepted 2013 Aug 12.

Copyright © 2013 Klatte, Bergström and Lachmann.

This is an open-access article distributed under the terms of the Creative Commons Attribution License (CC BY). The use, distribution or reproduction in other forums is permitted, provided the original author(s) or licensor are credited and that the original publication in this journal is cited, in accordance with accepted academic practice. No use, distribution or reproduction is permitted which does not comply with these terms.

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 (Nitrouer, 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,

Exhibit 11a

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.

8/4/2010 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](#)

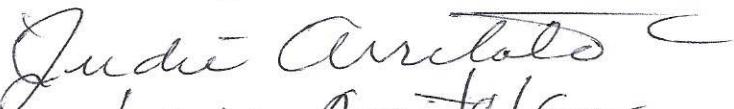


SCIENCE NEWS

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 
PRINTED NAME Judie Arntola
ADDRESS 603 Modefane LaGrande OR
EMAIL pjtolaj@charter.net

SIGNATURE 
PRINTED NAME John Gazzola
ADDRESS 484 Hawthorne DR. LG, OR 97850
EMAIL

SIGNATURE 
PRINTED NAME Andree Gulzow
ADDRESS 484 Hawthorne DR, La Grande OR 97850
EMAIL foreverfamily33@adelcore.com

SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 478 Makaike DR. OR 97850
EMAIL

SIGNATURE 
PRINTED NAME C. Huxoll
ADDRESS 472 Modelaine DR. La Grande, OR 97850
EMAIL CHRIS.HUXOLL@EMAIL.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

PRINTED NAME

Jessie Huyoll

ADDRESS

472 Madelaine DR. La Grande, OR 97850

EMAIL JESSIEHUYOLL@LIVE.COM

SIGNATURE

PRINTED NAME

Brent H. Smith

ADDRESS

410 Allium St La Grande 97850

EMAIL

smith.brent@gmail.com

SIGNATURE

PRINTED NAME

M. Jeannette Smith

ADDRESS

410 Allium Street

EMAIL

jeannetterupton@gmail.com

SIGNATURE

PRINTED NAME

KIMBERLEY HEITMAN

ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850

EMAIL kimheitman@hotmail.com

SIGNATURE

PRINTED NAME

Shawn K. Mangum

ADDRESS 2909 E.M. Ave.

EMAIL

Hoyahkw95@me.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

Jonathan D. White
Jonathan D. White

ADDRESS

485 Madelaine Dr

EMAIL

jondwhite418@gmail.com

SIGNATURE

Robin Steinfeld

PRINTED NAME

Robin Steinfeld

ADDRESS

485 Madelaine Dr. LaGrande

EMAIL

rstedfeld@yahoo.com

SIGNATURE

Ronnie L. Allen -

PRINTED NAME

Ronnie L. Allen 541-963-7720

ADDRESS

410 Balsa Street La Grande, Oregon 97850

EMAIL

None:

SIGNATURE

Rita Allen

PRINTED NAME

Rita Allen

ADDRESS 410 Balsa St. LaGrande Or.

EMAIL

SIGNATURE

Linda M. Snyder

PRINTED NAME

Linda M. Snyder

ADDRESS

491 17704 Zaire

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. Ostermann*

PRINTED NAME *Robert J. Ostermann*

ADDRESS *495 Modelaire Dr. La Grande, OR 97850*

EMAIL

SIGNATURE *Robert J. Ostermann*
Robert J. Ostermann

PRINTED NAME

ADDRESS *495 Modelaire Dr. La Grande, OR 97850*

EMAIL

SIGNATURE *John Yeates*

PRINTED NAME *JOHN YEATES*

ADDRESS *408 SUNSET DRIVE LA GRANDE, OR 97850*

EMAIL *jyeates52@gmail.com*

SIGNATURE *Ruth Schumacher Yeates*

PRINTED NAME *Ruth Schumacher Yeates*

ADDRESS *408 Sunset Dr, La Grande*

EMAIL *ruthschumacheryeates@gmail.com*

SIGNATURE *D. Dale Mammen*

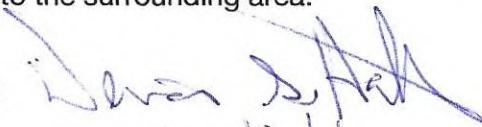
PRINTED NAME *D. Dale Mammen*

ADDRESS *405 Balsa, La Grande, OR*

EMAIL *d.mammen@poni.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



PRINTED NAME

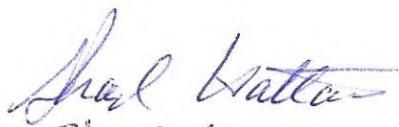
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



PRINTED NAME

Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

Geraldine BRASETH-PALMER

ADDRESS

1602 Gildcrest Drive - La Grande, Or 97850

EMAIL



SIGNATURE



PRINTED NAME

Jean RAPH

ADDRESS

1509 Madison Ave LaGrande, Or 97850

EMAIL

jraph19@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 *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 *melindaamcgowan@gmail.com*

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

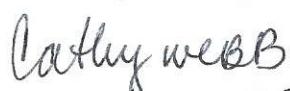
I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE 

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. LA GRANDE, OR 97850

EMAIL thinkski@gmail.com

SIGNATURE 

PRINTED NAME JoAnn MARLETTE

ADDRESS 2031 Court St. #8, Baker City, OR 97814

EMAIL garymarlette@yahoo.com

SIGNATURE 

PRINTED NAME Keith D. Hudson

ADDRESS 605 F Ave, La Grande OR 97850

EMAIL keithhudson@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 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, La Grande OR 97850
EMAIL *rlwd1910@gmail.com*

SIGNATURE *Gary D. Pierson*

PRINTED NAME Gary D. Pierson

ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Anne G. Cavinato*

PRINTED NAME Anne G. Cavinato

ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL *acavinat@eou.edu*

SIGNATURE *Joe Horst*

PRINTED NAME JOE HORST

ADDRESS 86 HAWTHORNE DR. LA GRANDE OR 97850
EMAIL *joehorst@eoni.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

Merie E Comfort

PRINTED NAME

MERIE E COMFORT

ADDRESS

209 Scorpio La Grande OR 97850

EMAIL

meriecomfort@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 home La Grande OR.

EMAIL

carolssummers1938@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. La Grande, 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 *9700 Hawthorne Dr, La Grande, OR 97850*

EMAIL *asherer@frontier.com*

SIGNATURE *Heather M. Null*

PRINTED NAME *Heather M. Null*

ADDRESS *492 Madelaine 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

PRINTED NAME

ADDRESS

EMAIL

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

August 16, 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

Part 1: Noxious Weed Plan Comments

Control of invasive species “weeds” has become increasingly important in Eastern Oregon due to previous inadequate logging, grazing and farming practices that have allowed invasive species to take root and flourish on both public and private lands. Exhibit P, IPC’s “Noxious Weed Plan” (DPO Attachment P 1-5) underestimates the extent of weed invasion and the processes necessary to eradicate and control the invasive species that have already taken hold and that will proliferate with additional and continued soil disturbance. These invasive species present a threat to Oregon’s native plant communities/wildlife habitat and promote risk from wildfire. 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.” Chapter 569 of Oregon law covers weed control https://www.oregonlegislature.gov/bills_laws/ors/ors569.html including obligation of land occupant:

569.390 Owner or occupant to eradicate weeds. Each person, firm or corporation owning or occupying land within the district shall destroy or prevent the seeding on such land of any noxious weed within the meaning of ORS 569.360 to 569.495 in accordance with the declaration of the county court and by the use of the best means at hand and within a time declared reasonable and set by the court, except that no weed declared noxious shall be permitted to produce seed.

Excellent Comments were provided in “B2H Noxious Weed Plan Comments” by a large group of weed professionals, submitted by Brian Clapp of Union County. The document states, “The County Weed Supervisors of Morrow, Umatilla, and Union counties met with the Oregon Dept. of Ag and Tri-County CWMA on August 22, 2017 to go over the B2H Attachment P1-5 Noxious Weed Plan. In conjunction with comments from previous meetings with Malheur and Baker county weed supervisors, the following list of concerns was developed...”. Upon comparing these comments with IPC’s Noxious Weed Plan of 2018 (Attachment P1-5), I was shocked to find that IPC’s Plan does NOT include the suggestions made by the weed managers.

The foremost item cited by weed managers in 2017 was IPC’s excluding themselves from responsibility for the FULL list of weeds. In 2018, IPC’s Weed Plan still only obligates IPC to control weeds in Class A and Class T lists. It is widely recognized that these weed “Classes” are determined according to agricultural priorities, not according to which weeds are the biggest threats to natural areas. Treating only Class A and T, a shorter list of weeds which are not very common, is especially devastating for natural areas, i.e. the vast majority of the proposed B2H routes. Any invasive plant can devastate an area- regardless of which “list” it is on. In fact, Class B and C weeds are generally the worst weeds and tend to be those which are spreading most aggressively and to more areas, thus threatening and ultimately devastating the most native habitat. The Weed Managers Comments of 2017 state, “every

landowner and land manager is responsible for the control of ALL state and county listed noxious weeds on their property/ ROW. Whether the weeds have been here for 50 years or don't show up till the 20th year of Operation, IPC will be held responsible for the control of noxious weeds in the areas they manage-the same as everyone else." IPC has offered nothing in response.

As an example of serious weeds that would be excluded according to IPC, two of the worst weeds which occur in the vicinity of the Union County portion of Proposed and Alternate routes, *Leucanthemum vulgare* (ox eye daisy) and *Rosa rubiginosa* (sweet briar rose) are not included in Table 1 of the Weed Plan "Designated Noxious Weeds". These species are listed in Union County Class B <http://union-county.org/wp-content/uploads/2017/04/Union-County-Weed-List-2019-and-cost-share-Ad.pdf>. Other "Class B" list weeds include sulphur cinquefoil, whitetop, diffuse and spotted knapweed – all present in the proposed areas of disturbance and certain to spread to currently intact native plant communities, should B2H construction proceed. These weeds, which are even now devastating thousands of acres of native plant communities, would not be treated under their Weed Plan – and neither would any of the other dozens of species on Class B and C lists, or new invasives, which may take some time to be added to a list. Union County Class "B" list alone includes 24 noxious weeds. Other landowners are required to follow County and State laws and control ALL noxious weeds. Why should Idaho Power be exempt?

Weed Surveys provided in Exhibit P-1 part 2a and b are misleading; many species which would not be controlled by IPC under their "Weed Plan" are included in the surveys. Surveys were done between 3-8 years ago, a very long time in terms of weed spread. Surveys done so long ago using an outdated list and in such an artificially limited area are not acceptable.

In addition to exempting themselves from the full list of weeds, IPC's Post Construction treatments is otherwise ridiculously limited and unacceptable. In fact I could not believe the State Weed Program would sign off on it. Perhaps they did not. Here is an excerpt from their Plan (Monitoring 6.1):

As stated above, noxious weed monitoring and control will occur during the first 5-year period. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will conclude that it has no further obligation to monitor and control noxious weeds in that area of the Project. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, or may request a waiver from further noxious weed obligations at these sites.

Treating weeds only once per year will result in an increase rather than a decrease in weed presence. Noxious weeds cannot be "successfully controlled" in 5 years. IPC would appeal to ODOE to claim areas of the "Project" had "successfully controlled weeds", and then be exempted from further responsibility, allowing invasive species to return and take over the treated areas. The Plan further states "if control of noxious weeds is deemed unsuccessful...IPC will coordinate with ODOE regarding appropriate steps forward," including "request a waiver from further noxious weed obligations." Essentially IPC comes by once per year for 5 years at most, inevitably fails in weed control, and is ultimately not responsible. Landowners are burdened with more weed control, and our ever-shrinking valuable native plant communities are compromised or eliminated, leaving native animals without habitat.

IPC's Plan states they are not responsible for "areas outside of the ROW." Weed sites immediately outside areas of potential disturbance are highly likely to spread to the disturbed areas but would not be recorded. Noxious weeds spread quickly, often exploding exponentially in a single season. IPC is proposing a huge area of disturbance; their responsibility should not be limited to the ROW.

As IPC has proposed only annual treatments, one can surmise they would use primarily residual herbicides. Residual herbicides may seem like the answer to the dilemma of weeds constantly in seed production. Herbicides such as aminopyralid and imazapic have become the herbicides of choice for many species. These herbicides prevent germination for up to 3 years following application in eastern Oregon. This means germination of native plants as well as weeds. Bare spots are created where weeds once were. Revegetation by anything at all is prevented. After 2-3 years when the soil born chemical is reduced, weeds pioneer the site. In addition, native plants next to the weeds can die as a result of root uptake of the herbicide even though they were not sprayed directly. When using aminopyralid, willows, aspen, conifers (especially larch) and desirable native forbs in certain families are often killed in this way. Successful revegetation is very unlikely. Since IPC is proposing to treat weeds for only 5 years, it is very likely a couple of treatments using residual herbicides would suppress weeds for that time, only to explode on the – now bare—areas once occupied by valuable native plants. This would increase rather than decrease the invasive species presence and take over in these areas.

In summary, IPC's Noxious Weed Plan does not comply with Chapter 569 of Oregon law. IPC denies responsibility for control of most weed species, denies responsibility for weed control after 5 years, controls weeds only annually, and even allows them a waiver when control has failed. EFSC should reject the Weed Plan and Application. As a condition of re-applying, IPC should be required to post a bond to secure weed management for the lifetime of the project, which they claim is 45 years. Much is at stake, and there is no going back when thousands of acres of native plant communities are lost to invasive species.

Thank you for your consideration of this concern,



Meg Cooke
1601 Oak St.
La Grande, OR 97850

12 August 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:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within $\frac{1}{2}$ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.

My Code
(Signature)

Name:

Address

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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I do it was extensive because it is entirely 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.

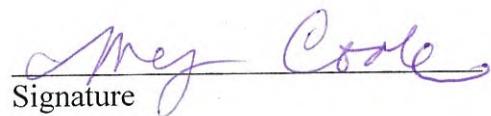
Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it's difficult to believe “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 a 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

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 a 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 ASC and DPO which will be addressed in a separate comment.


Signature

Name:

Address:

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,



Name

Address

91 OAK ST

LA GRANDE OR 97850

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 $\frac{1}{4}$ 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 $\frac{1}{4}$ 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:

12 August 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:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within $\frac{1}{2}$ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.

Elburn L Cooper
(Signature)

Name: ELBURN L COOPER
91 OAK ST WAGGRAND OR 97850
Address

August 10, 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

B2H.DPOComments@Oregon.gov

Dear Chair Beyeler and Members of the Council:

I am a long time La Grande resident. I have always treasured Morgan Lake as an exceptional part of my enjoyment of this area, and I was pleased to see that the applicant apparently agrees with me:

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).

I certainly agree with this part of the application:

Page 146 (T-4-47) "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape," but I can't imagine how pine trees no taller than 80' are supposed to "... block views of the towers from most locations in the park." p. 49 (T-44)
I don't see any photos or graphics that support that conclusion. Is it so just because Idaho Power says it's so?

Because I have visited Morgan Lake many times over the years, I was surprised by the incomplete and thus inaccurate description of Morgan Lake Park:

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, with one lake. Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, right beside it, covers 27 acres.

Twin Lake is basically a wet lands which blooms with beautiful yellow water lilies in the spring. It is completely undeveloped. The bird population, including ducks, geese, osprey, cormorants, and nesting bald eagles, as well as other wildlife, enjoys this special sanctuary.

I have to wonder how Idaho Power, which claims to have carefully surveyed all the areas the transmission line might impact, could have omitted such an important feature of the Park. How many other errors are in the application? I urge EFSC to require documentation to support all of applicant's conclusions.

Elburn L Cooper
signature

Name: ELBURN L COOPER
91 OAK ST LA GRANDE OR 97850
Address:

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:

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.

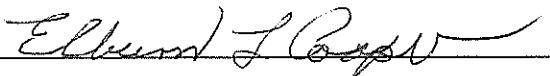
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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



Name: ELBURN L COOPER

Address: 91 OAK ST

La Grande, OR. 97850

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,

Name: *Elburn L Cooper* ELBURN L. COOPER
Address: *91 OAK ST La Grande OR 97850*

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.*

Personius, S. F. Compiler, 202c, Fault number 802a West Grande Ronde Valley fault zone, Mount Emily section, in Quaternary fault and fold database of the United States: U. S. Geological Survey website
<http://earthquakes.usgs.gov/hazards/qfault>, accessed 11/16/2016 06:23 PM

Schlicker, H. G. and Deacon R. J. 1971 Engineering Geology of the La Grande Area, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open File Report O-1971-03, 16 p., 1 plate, scale 1:24,000.

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,

Elizabeth A. Cooper

Name: *ELIZABETH A. COOPER*

Address: *91 OAK STREET
LA GRANDE, OR 97850*

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 affects 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,

Elizabeth A. Cooper

Signature

Printed Name: ELIZABETH A. COOPER

Mailing Address: 91 OAK STREET
LA GRANDE, OR 97850

Email: lizbethcooper@frontier.com

August 18, 2019

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

Regarding: THERE WILL BE AN INCREASED RISK OF WILD FIRES AND THERE IS A LACK OF LOCAL RESOURCES TO RESPOND IN A TIMELY AND EFFECTIVE MANNER.

The Boardman to Hemingway transmission line will increase the potential and severity of wildfires due to opening up additional access for people, lightning strikes, remoteness of much of the line, the fact that high voltage transmission lines increase the height and heat of fires along the transmission lines, and limitations on local human and equipment resources to fight wildfires in remote locations.

Both Union County and Baker County have submitted comments regarding the fact that they do not have the manpower or specialized equipment necessary to fight fires in the new remote areas which will have an increased risk of catastrophic fires. Part of the area which will be crossed by the transmission line has no designated fire protection other than the Oregon Forest service.

Given the timeframes for contacting and assembling volunteers, and the long travel times to respond to multiple areas along the transmission line, fires will have an opportunity to grow significantly prior to any fire response being able to access the area. Reports from volunteers called on to fight a fire which occurred during the construction of the Elkhorn Wind development stated they had difficulty accessing the area, the terrain was steep and there were multiple rattlesnakes in the area which made the job of fighting the fire very difficult.

Both Union and Baker Counties have submitted written comments to the Oregon Department of Energy stating they would need additional manpower and equipment if they are to be in a position of being able to effectively protect the citizens and resources from potential wildfires resulting from the development of the transmission line.

This is a serious issue due to the fact that the developer has indicated their intent to rely upon local resources in the event a fire occurs along the transmission line.

Sincerely,

Elizabeth A. Cooper
ELIZABETH A. COOPER
Address: 91 OAK STREET
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!**

Elizabeth A. Cooper
Signature
Printed name: ELIZABETH A. COOPER
Mailing address: 91 OAK STREET
LA GRANDE, OR 97850

Email address: *lizbethcooper@frontier.com*
phone number: (optional)

August 1, 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:

1. Idaho Power failed to provide noise estimates for the lay down areas and incorrectly determined they were not required to do so.
2. Idaho Power failed to include all sources of noise as required by OAR 340-035-0035 in noise modeling done on all sites which were not previously used.

References:

OAR 340-035-0035

The exception to requiring noise impacts from sources listed in subsections (5)(b) - (f), (j), and (k) does not apply to developments on sites not previously used. When a lay down area, or other development is located on a site not previously used, the rule states "Sources exempt from the requirements of section (ii) 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 must provide noise monitoring results for all lay down areas or other areas where these types of noise will occur in areas not previously used.

Site Condition needed:

The applicant will complete noise modeling which includes the noise sources identified in OAR 340-035-0035 for all areas where development will occur on sites not previously used. The uses are contained in OAR 340-035-0035(5)(b) - (f), (j), and (k).

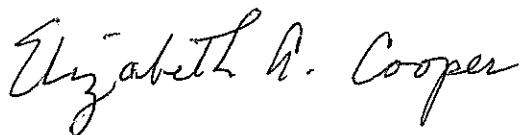
For any site exceeding the noise standards, the developer will obtain a waiver from the property owner prior to the start of construction, or establish through all available means of mitigation that the location will not exceed the noise standard.

When applying another agency's rules, the Oregon Department of Energy and Energy Facility Siting Council do not have the authority to make unique interpretations of common terms like "infrequent". The Oregon DEQ as the agency responsible for the rules must

provide any interpretation if indeed one is needed beyond the dictionary and common use of the term.

Noise surveys have not been completed, and it has not been established that the project will be able to meet the requirements of the standard, therefore, the site certificate must be denied.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth A. Cooper".

Signature

Printed Name: ELIZABETH A. COOPER

Mailing address: 91 OAK STREET
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:

Idaho Power's application admits that "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew. In addition, much of the analysis area includes open remote lands where access is limited. A fire in one of these areas may not be immediately identified. However, once a fire has been identified, the fire districts responding to requests for information have indicated that average response times range from about 8 to 40 minutes, depending on the location (Table U-10)." (p. U-16)

However, the Table U-10 claims that response times for Union County Rural Fire Department range from 4 to 8 minutes (p. U-17). This is an absurd claim for Morgan Lake, a narrow gravel road which gains over 1,000 feet of elevation in less than 2 miles. The drive from Island City is 15 minutes minimum, without adding time needed for volunteer fire fighters to reach the station. A more realistic best case scenario would be 25 minutes.

Fire in the Morgan Lake area or the hills to the south and west of La Grande would likely be catastrophic, with hundreds of homes located down the canyons of Mill Creek and Deal Creek. The 1973 Rooster Peak wildfire burned over a large section southwest of town, coming within a quarter-mile of Grande Ronde Hospital (<https://www.lagrandeobserver.com/localstate/4036445-151/recalling-the-fire-of-august-1973>).

The applicant's Fire Plan is weak, reactive and lacks adequate prevention. Idaho Power does not describe the significance of a 500-kV line compared to other high voltage lines for potential fires. Any fire near power lines gets more complicated. ODOF states concerns for fire fighter safety because electricity can arc through smoke or steam striking anyone in the area. IPC plans to rely entirely upon local fire departments for safety. Mostly volunteer, understaffed, under equipped - certainly for any major fire. The Fire Plan obviously is the least costly gesture at compliance; it is inadequate and unacceptable.

In addition, road building, blasting, and earth moving activities are likely to cause erosion and sedimentation in the south and west hills, worsening the possibility of flooding in the Mill Creek, Miller Creek, and Deal Creek drainages. 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.

Deal Creek and Miller Creek areas have flooded in recent years, causing flooded basements, washed-out driveways (as happened at our house on March 23, 2019, causing \$800 worth of damage), and eroded streets. This April, La Grande city crews spent major time monitoring and repairing flooding on Mill Creek in the area of C Avenue (<https://www.lagrandeobserver.com/newsroomstafflist/7079739-151/waters-rising>). On May 25, 2011, major floods swept through La Grande and caused flooding along B, C, M and N as well as Alder Street, resulting in both the city and county declaring a state of emergency. Streets were damaged, basements were submerged, and some residents had to be evacuated. (<https://www.lagrandeobserver.com/localstate/4083593-151/county-city-move-forward-with-emergency-declarations>). "Norm Paullus, director of La Grande Public Works, said water poured out of the Mill Creek and Gill Creek drainages in La Grande's South Hills district, clogging pipes and spilling into southside streets, including B, C, M and N avenues, and Alder Street. Some families reported flooded basements... The west end of C Avenue and driveways in that area were washed out, Paullus said. No injuries were reported, but people in some neighborhoods were evacuated and damage to southside homes and outbuildings was extensive." (<https://www.lagrandeobserver.com/localstate/4083480-151/rain-swollen-creeks-flood-streets-homes>)

April 7, 201
Mill Creek
flooded the
top of Oak
street and
eroded much
of the
bank next
to our
garage.

Provisions for monitoring areas disturbed by construction should be provided, with emergency plans in place to protect the area and its residents from flooding in areas impacted by tower construction.

Elizabeth A. Cooper
Signature

Name: ELIZABETH A. COOPER

Address: 91 OAK STREET
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 N.E.
Salem, OR. 97301
Kellen.Tardaewether@oregon.gov

**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 faulty and 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/> "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: "*(KCIs) 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/oregontwo/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 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,


Name ELIZABETH A. COOPER
Address 91 OAK ST.
LA GRANDE, OR 97850

TARDAEWETHER Kellen * ODOE

From: Matt Cooper <mcooperpiano@gmail.com>
Sent: Sunday, August 11, 2019 8:26 PM
To: B2H DPOComments * ODOE
Subject: Letter re: B2H DPO/Exhibit U/flood and fire protection
Attachments: B2H letter.docx

Dear Siting Council,

Here is a letter regarding the DPO for the Boardman to Hemingway line, in regard to concerns with fire risk, as well as storm water drainage causing flooding in the southwest hills of La Grande where I live.

Sincerely,

Matt Cooper, DMA
302 C Ave.
La Grande, OR 97850

August 11, 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 Chairman Beyeler and Members of the Council:

I am a long term resident of La Grande, and live on C Avenue (which overlays the Oregon Trail) on the edge of town near the proposed route of the B2H Morgan Lake Alternative line. I wish to express my concerns about Exhibit U (3.5.6.2 and 3.5.6.5) and the negative impacts the B2H line could have on fire and flood protection to the residents of Southwest La Grande, particularly if the Alternate Route is adopted.

I would submit that this project is in violation of Oregon Administrative Rule 345-022-0110, which requires that the construction and operation of the facilities "are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, *storm water drainage*, solid waste management, housing, traffic safety, police and *fire protection*, health care and schools" (italics mine).

Fire Protection: I am glad that Idaho Power acknowledges the fire risks in their Draft Protective Order, as in Exhibit U-3.5.6.2 (p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site."

This is noteworthy because in the Morgan Lake area or the hills to the south and west of La Grande, where the proposed construction would take place, fire would likely be catastrophic, with hundreds of homes located down the canyons of Mill Creek and Deal Creek. In addition, Grande Ronde Hospital, La Grande High School, and Central Elementary School all lie a short distance from the mouth of Deal Canyon. Note that both canyons lie to the south or west of town; prevailing winds in this region come from those directions, and the down-valley wind effect common in late afternoons and evenings would carry the flames directly down these drainages. As a result, the 1973 Rooster Peak wildfire burned over a large section southwest of town, coming within a quarter-mile of Grande Ronde Hospital

(<https://www.lagrandeobserver.com/localstate/4036445-151/recalling-the-fire-of-august-1973>).

In Idaho Power's own application, JB Brock, Union County Emergency Manager, states that "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight. He stated that during construction it would be challenging in a rural location for ambulance calls. It would require local coordination of emergency response plans. Operation of the project has the potential for impacts. He stated that the project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6)

Idaho Power's application also acknowledges that "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew. In addition, much of the analysis area includes open remote lands where access is limited. A fire in one of these areas may not be immediately identified. However, once a fire has been identified, the fire districts responding to requests for information have indicated that average response times range from about 8 to 40 minutes, depending on the location (Table U-10)." (p. U-16)

However, the Table U-10 claims that response times for Union County Rural Fire Department range from *4 to 8 minutes* (p. U-17). This is an absurd claim for Morgan Lake, a narrow gravel road which gains over 1,000 feet of elevation in less than 2 miles. Starting from its origin at the end of Walnut Street, a vehicle would have to travel up this hill at an average speed of almost 30 miles per hour to reach Morgan Lake in four minutes—a speed which would be unsafe on this road for even a passenger car, let alone a fire engine. This does not take into account the approximately two additional miles from the La Grande fire station to the base of Morgan Lake Road.

Storm Water Drainage and Flood Protection: In addition, road building, blasting, and earth moving activities threaten to cause erosion and sedimentation in the south and west hills, worsening the possibility of flooding in the Mill Creek, Miller Creek, and Deal Creek drainages. Deal Creek and Miller Creek areas have flooded in recent years, causing flooded basements, washed-out driveways; this happened at our house on March 23, 2019, as a result of flooding of a creek known to locals as "Miller Creek." Miller Creek is so small it is not even shown on topographic maps (it only shows as a drainage); yet it caused \$800 worth of damage to our driveway, eroded streets and gutters, and deposited gravel throughout the neighborhood. As a result of this same flood, La Grande city crews spent major time monitoring and repairing flooding on Mill Creek in the area of C Avenue (<https://www.lagrandeobserver.com/newsroomstafflist/7079739-151/waters-rising>).

Idaho Power claims to mitigate storm water drainage in Exhibit U, 4.1.3 (p. 27), yet they plan to build a new road a short distance away and directly uphill from the same site that flooded our home earlier this spring, as shown by the following map (upper center, the road which begins at Modelaire St.). Since Miller Creek is not even shown as such on existing topo maps, it is unlikely that they are even aware of the topography of this area or the potential for flood damage downhill from their proposed road:

https://boardman2hemingway.blob.core.windows.net/maps/03_Union/Map_51.pdf

This is not the only such incident in recent memory. On May 25, 2011, major floods swept through La Grande and caused flooding along B, C, M and N as well as Alder Street, resulting in both the city and county declaring a state of emergency. Streets were damaged, basements were submerged, and some residents had to be evacuated (<https://www.lagrandeobserver.com/localstate/4083593-151/county-city-move-forward-with-emergency-declarations>). "Norm Paullus, director of La Grande Public Works, said water poured out of the Mill Creek and Gill Creek drainages in La Grande's South Hills district, clogging pipes and spilling into southside streets, including B, C, M and N avenues, and Alder Street. Some families reported flooded basements... The west end of C Avenue and driveways in that area were washed out, Paullus said. No injuries were reported, but people in some neighborhoods were evacuated and damage to southside homes and outbuildings was extensive." (<https://www.lagrandeobserver.com/localstate/4083480-151/rain-swollen-creeks-flood-streets-homes>)

In summary, the B2H transmission line poses significant threats to the southwest hills of La Grande in terms of fire risk, particularly in Mill Creek canyon directly downhill from Morgan Lake. They also are likely to exacerbate problems with storm water drainage in the west hills, increasing the likelihood of seasonal flooding resulting in damage both to private property (homes, basements, and driveways) and to city streets in this part of town. As such, they would be in violation of OAR 345-022-0110, and thus I recommend that the Council reject the proposal to construct this line.

Sincerely,

Dr. Matthew J. Cooper
302 C Ave.
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

From: Matt Cooper <mcooperpiano@gmail.com>
Sent: Sunday, August 18, 2019 8:47 PM
To: B2H DPOComments * ODOE
Subject: Letter re: mapping, property owner notification, distances
Attachments: B2H Letter II--MC--Notification.docx

Dear Siting Council,

Attached is a letter regarding these issues.

Thank you,

Matt Cooper, DMA
302 C Ave.
La Grande, OR 97850

August 17, 2019

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

Dear Chairman Beyeler and Members of the Council:

I am a long-term resident of La Grande and live on C Avenue, the site of the Oregon Trail and near the proposed B2H "Alternative Route." I'm concerned that Idaho Power Corporation is not complying with the requirements for notification of nearby property owners and the posting complete or detailed maps to the public. It has also attempted to obfuscate and confuse the public regarding the required distances from the project to nearby noise sensitive properties, and the EFSC has made matters worse by circumventing existing OARS on the required distance for notification.

1. Confusion and obfuscation regarding distances; attempts to circumvent ORS 183.335 and OAR 345-001-0000 (Exhibits F and X):

There is inherent confusion and contradiction within the Draft Proposed Order regarding the distances required. Exhibit F (2.1, F-1) reads:

"Property adjacent to the site boundary means property that is: 22 (A) Within 100 feet of the site boundary where the site, corridor or micrositing corridor is 23 within an urban growth boundary. 24 (B) Within 250 feet of the site boundary where the site, corridor or micrositing corridor is 25 outside an urban growth boundary and not within a farm or forest zone. 26 (C) Within 500 feet of the site boundary where the site, corridor or micrositing corridor is 27 within a farm or forest zone."

Yet Exhibit X (3.5, p. F-5) reads:

"OAR 345-021-0010(1)(x): (E) A list of the names and addresses of all owners of noise 3 sensitive property, as defined in OAR 340-035-0015, within one mile of the proposed site 4 boundary. 5 The Amended Project Order states: 6 However, because of the linear nature of the proposed facility, the requirements of 7 paragraph E are modified. **Instead of one mile**, to comply with paragraph E the applicant 8 must develop a list of all owners of noise sensitive property, as defined in OAR 340-035-9 0015, **within one-half mile** of the proposed site boundary. 10 IPC will provide noise sensitive property owner within one-half mile of the proposed Site 11 Boundary information in Attachment F-1. To ensure that the most current property owner 12 information will be used for notification, IPC will provide Attachment F-1 with the final Application 13 for Site Certificate."

Given the contradictions within the DPO, and the irrelevance of terms such as “Urban Growth Boundary” to areas such as La Grande, **it would seem reasonable to simply notify property owners within the larger of the two distances.** Failing to do so is potentially confusing to the public, and can potentially obfuscate the issue of whether or not the list is complete under each of the relevant standards, and in so doing create confusion about who has been notified for and for what reason.

Yet even if this practice were to be adopted, Exhibit X proves that the EFSC has attempted to circumvent Oregon Administrative Rules by **arbitrarily changing the required distance from one mile to one half-mile.**

EFSC has not cited any authority for its assertion in the Project Order that a reduction of the notice area is allowed. Instead the Order just states that a reduction is authorized. **That is neither legal, nor appropriate.**

The one-mile notice list is required by a Rule. To amend or modify an adopted Rule, EFSC (like any other agency) must follow the procedures set out in ORS 183.335 and OAR 345-001-0000(1). That was not done here. Instead, the Project Order purports to amend or modify the Notice rule, as an administrative act by the agency. **That type of amendment is not lawful.**

For there to be lawful notice in conformance with the rules, EFSC should insist that the applicant provide a list of all owners of noise sensitive property within one mile of all edges of the proposed site boundary – and then re-open the comment period on this project.

2. Attempts to circumvent OAR 345-021-0010, regarding notification to noise-sensitive property:

Under OAR 345-021-0010(1)(x)(E) the application must include “a list of names and addresses of all owners of noise sensitive property . . . **within one mile** of the proposed site boundary.” In this instance EFSC purported to modify or amend that requirement, in its Project Order, to only require a list of owners within $\frac{1}{2}$ mile. (Project Order at p. 21.)

The Rule is clear that the list of names and addresses must include “all owners of noise sensitive property... within one mile **of the proposed boundary.**” OAR 345-021-0010(1)(x)(E)(emphasis added). The Rule does not require a notice list 1 mile in diameter. **It specifies a list with the boundary of the project as the starting point for measuring the 1-mile notice.**

3. Incomplete mapping; failure to locate nearby property owners:

The following map reveals that, although many property owners have been identified and listed, numerous property boundaries are shown which **do not identify any property owner. Our own property at 302 C Avenue is not listed, nor is that of our neighbors Brian Spencer (202 C); Cori Brewster (306 C); or Susan Albers (301 C).** These appear as the blank properties in the upper center of the map, where the proposed road from the end of Modelaire takes an abrupt turn to the south:

https://boardman2hemingway.blob.core.windows.net/maps/03_Union/Map_51.pdf

Many other neighbors are also omitted; of the ones I can name easily, Mike and Candace Smith, Grant Cooper, Steve and Susan Eder (vicinity of B and Walnut). **If Idaho Power has not even bothered to locate owners of noise sensitive property, how do they expect to give proper notification?**

In addition, this map omits many details. According to OAR 345-001-0010(55): “Maps shall provide enough information for property owners potentially affected by the facility to determine whether their property is within or adjacent to the site boundary. Major roads shall be named. IPC shall include maps drawn to a scale of 1 inch = 2,000 feet or smaller when necessary to show detail.”

“Maps shall clearly show the boundaries of the proposed corridor within which the transmission line would be constructed, and shall include familiar landmarks such as roads and existing power lines that reviewing agencies and affected landowners may use to identify the proposed route. Aerial photographs with all roads identified are helpful for public interpretation and review. The site boundaries of all proposed related or supporting facilities, including but not limited to access roads, temporary lay down areas, switching stations/substations, must also be identified. Maps showing access roads included as related or supporting facilities shall clearly depict where existing roads or road segments are proposed to be in the site boundary.”

The maps provided in the application do *not* clearly depict existing roads or road segments. Therefore the B2H application maps lack the detail that is required by the state of Oregon because the maps do not show the names of the streets. Without detailed maps property owners cannot tell how they will be directly affected by this project. Summary: La Grande maps lack the details required by the state of Oregon to meet ordinance OAR 345-001-0010(55).

In summary, Idaho Power’s application for the Boardman to Hemingway power transmission line contains multiple flaws. The application has not provided clear maps with all roads identified to help the public interpret and review their application and thus

determine how this project would affect them personally. The application has also omitted the names of the roads that will be used in La Grande. Its maps omit many nearby property owners, thus it is incomplete and inaccurate. It has also attempted to confuse the public with regard to what is required as far as notification (Exhibits F and X), and even worse, the EFSC has attempted to circumvent OARs by reducing the required distance in Exhibit X from one mile to one half mile.

Therefore the Oregon Department of Energy Siting Council needs to deny Idaho Power's application for the B2H transmission project due to the fact that the application violates several OARS, including 345-001-0010(55) (clear mapping), 345-021-0010(1)(x)(E) (notification of noise sensitive property owners), and ORS 183.335 and OAR 345-001-0000(1) (modification of adopted rules by an agency).

Sincerely,

Dr. Matthew J. Cooper
302 C Ave.
La Grande, OR 97850-1137

ESTERSON Sarah * ODOE

From: Matt Cooper <mcooperpiano@gmail.com>
Sent: Tuesday, August 20, 2019 12:02 PM
To: B2H DPOComments * ODOE
Subject: Letter re: B2H Morgan Lake Alternative; Exhibits R and T
Attachments: B2H Letter III.docx

Dear Council Members,

Attached is a letter expressing my concerns about IPC's proposed B2H/Morgan Lake Alternative line, particularly in regard to the degradation of scenic and recreational values at Morgan Lake City Park in La Grande.

Sincerely,

Dr. Matthew J. Cooper
302 C Ave.
La Grande, OR 97850-1137

Aug. 19, 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

E-MAIL: B2H.DPOComments@oregon.gov

Dear Chair Beyeler and Members of the Council:

I am writing to comment on the Idaho Power Application for Site Certificate (ASC) to construct the Boardman to Hemingway Transmission Line. Specifically, this comment will address noncompliance with requirements and council standards in Exhibit T (and an omission in Exhibit R) in Union County, and more specifically those relating to Morgan Lake Park, located just outside the city limits, but belonging to the city of La Grande.

As a long time resident of La Grande, I've participated in some, and observed many of the wide range of uses in all four seasons of Morgan Lake Park, which the city acquired sixty years ago in 1959. The park is a popular spot for hiking, picnicking, birding, camping, trail running, fishing (including the ODFW Free Fishing day, and the Bi-Mart fishing derby), swimming, kayaking (motorized craft are prohibited), and paddle-boarding. It's been the site more than once for the XTerra Solstice Triathlon (<https://www.lagranderide.com/xterra/race-central>), with competitors swimming Morgan Lake and using nearby single track for biking. Since Morgan Lake Road gains over 1200 feet in less than two miles from the southwest corner of town, it is also a destination for local mountain bikers and trail runners. In terms of wildlife, it is home to cormorants, osprey, and nesting bald eagles. The Union High School cross-country team uses it for training, and it has been used for "Ultimate Frisbee" tournaments. In winter, it is used by skiers, ice skaters and even ice fishermen.

This jewel of a city park, one of few such parks in Oregon that can compare in terms of scenic and recreational opportunities, is threatened by the prospect of being turned into an industrial zone by 150 foot, buzzing utility towers. The scenic value will be unalterably degraded, leading to a loss of recreational value for the city, the county, Northeast Oregon, and visitors to this region. **And inexplicably, it is entirely omitted from Table R-1: it is omitted from the list of scenic locations in both Union County (p. R-9) and La Grande (p. R-13).** (It may have been omitted from the La Grande list due to the fact that it lies outside the city limits?)

Morgan Lake Park, analyzed as part of the Morgan Lake Alternative - (Attachment T-3, Table T-2, p. T-3-2; Table T-3-1, p. T-13) and Summary of

Impacts, pp. T-27-28, 43, (T-4-51-56), inaccurately describes the park itself and severely underestimates the permanent impact of development on this unique city park.

OAR 345-022-0080 states that “to issue a site certificate, 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.”

The Morgan Lake Recreational Use and Development Plan (City of La Grande undated) specifies that the park “shall be managed and improved in a manner consistent with the objective of providing a quality outdoor recreational experience harmonious with a natural forest and lake area. . . . 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...”

OAR 345-022-0100

The Morgan Lake Recreational Use and Development Plan (City of La Grande undated) specifies that the park “shall be managed and improved in a manner consistent with the objective of providing a quality outdoor recreational experience harmonious with a natural forest and lake area. . . . 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...”

Interpretation of Designation: Management objectives are not specified for scenic resources. However, enjoying scenery is mentioned as one of the activities offered by the park (City of La Grande 2016); therefore, scenery is considered a valued attribute of this recreation opportunity. Management goals that specify preservation of the “maximum natural setting” speak to how the City will develop and maintain recreational facilities within the Park (City of La Grande undated). (p. T-4-51)

As one crests the hill of the Morgan Lake Road, 2 miles from La Grande, suddenly there is a breathtaking view of Big Sky Country landscape. Cloud formations fill the view. They are the only impediment to a 360 degree view of the forested hills at least 20 miles to the west, Mount Emily to the north, rolling pasture land to the south, and to the east, a view across the entire valley, as far the Blue Mountains and Eagle Cap. **This is a stunning viewscape, unmarred by buildings or power lines.**

Avoidance and minimization of potential visual impacts were primary objectives in the Project siting work. Exhibit B and Attachments describe the siting studies completed for the Project. Sensitive viewers and viewing locations addressed in the siting study included scenic byways, intact segments of the Oregon National Historic Trail, ACECs, community park communities. (p. T-57)

The Morgan Lake Alternative Route would site a 150' tower directly ahead as one crests the Morgan Lake Road. This tower would be 723' from the park boundary. Another tower, to the east, will be within 500' of the park boundary.

Magnitude of Impact:

Explanation: Views of the Project will be experienced from a neutral position and will be equally peripheral and head-on, intermittent and continuous. Vegetation will block views of the towers from most locations in the park, so viewer perception could be intermittent and peripheral while viewers are moving through the park, but could be continuous and/or head-on while engaging in activities such as camping, picnicking, and fishing. Therefore, viewer perception will be medium. (p. T-4-54)

Camping, picnicking and fishing are precisely the activities that draw locals and tourists to the lake. Viewer perception will not be “moderate” or “medium;” it will be changed to shockingly industrial.

The landscape is primarily flat, with the lake being the primary feature, appearing smooth, flat, and reflective. (p. T-4-51)

Vegetation located along the southern perimeter of the lake will screen views from campsites and locations on the water. Visual contrast from these areas will be weak-moderate and the tops of towers will appear subordinate to the larger landscape and vegetated ridgeline. (p. T-4-53)

As for “vegetation screening views,” this is an absurd statement, given that the tallest trees bordering the lake are 80’ high. They will not block 150’ high towers from viewers either on or next to the lake.

Though scenic attractiveness and landscape character would be maintained, scenic integrity will be reduced to moderate. (p. T-4-54)

Landscape character will be altered and scenic integrity of the Morgan Lake experience would, in fact, be destroyed permanently.

Summary and Conclusion:

The Proposed Project will result in long-term visual impacts to Morgan Lake Park. Impacts will be medium intensity as measured by visual contrast and scale dominance, resource change, and viewer perception. Visual impacts will not preclude visitors from enjoying the day use and overnight facilities offered at the Morgan Lake Park. Therefore, visual impacts to Morgan Lake Park will be less than significant. (p. T-4-56)

Admittedly “view perception” and “enjoyment” are subjective. Although the view of 150’ high support towers for a 550kV transmission line may be enjoyable to select Idaho Power staff and share holders, it will be devastating to La Grande and Union County residents who, for generations, have enjoyed time at this exceptional lake at the top of a mountain road--a wildlife and nature preserve far from the sound of the interstate, with no shooting or motorized craft allowed in order to maintain the serenity of a camping, fishing and picnicking experience unavailable at any other park in the county.

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)

It is impossible to argue that camping in the middle of an asphalt urban parking lot is the same as camping in a pristine rural campground. Morgan Lake Park hosts’ records show that tourists from all over the United States have braved the challenge of driving their campers up the dangerously steep and narrow Morgan Lake Road to experience the unique pleasures of this admittedly rare tranquil lake experience. They willingly forgo the commonly provided amenities of electricity and running water to enjoy the serenity of this lakeside location, which limits camping to three nights in one of only 12 campsites. Of course it is possible to fish and picnic and camp within sight of mega-towers supporting crackling, popping transmission lines, but **to say that the impact of those towers on the experience will be “less than significant” is corporate self-serving and disingenuous.**

Unless these conclusions are supported by valid research showing that recreationists make no distinction between pristine rural campsites and urban, noisy crowded campgrounds, they are invalid.

This application characterizes Morgan Lake as “probably irreplaceable,” a spurious designation. Mitigation could not possibly duplicate this jewel of Union County.

Existing Conditions:

Morgan Lake Park comprises Morgan Lake, the shoreline, and the treed areas immediately surrounding it to the south and east. (p.T-4 46)

In this application, Morgan Lake Park is described as containing one lake. **In fact, Morgan Lake Park encompasses two separate lakes.** Morgan Lake is 70 acres in size and is developed with road access and camping. Lower Morgan Lake is 27 acres in size, undeveloped, and with no road access or camping. **The Application map of Morgan Lake Park (Figure T-4-6, p. T-4-57) is inaccurate. It shows Morgan Lake Park with a small unnamed lake outside the park perimeter. Twin Lake, aka Lower Morgan Lake, is indisputably within the park boundaries.**

Per OAR 345-022-0040 "Morgan Lake Park is not a Protected Area."

Lower Morgan Lake is officially recognized by both the State of Oregon and by Federal Agencies as Twin Lake (See USGS – Hilgard Quadrangle Topographic Map).

This is especially confusing because the City of La Grande's Morgan Lake Park Plan recognizes Twin Lake as "Lower Morgan Lake." **Twin Lake has been identified by both Federal and State efforts to conserve, restore, and protect wetlands.**

Oregon has developed a Wetland Conservation Strategy (Oregon Division of Lands, 1993). This Strategy is implemented through the Oregon Wetlands Inventory and Wetlands Conservation Plans (See Webpage). This planning process allows local governments to balance wetlands protection with other land-use needs. Twin Lake was recognized as an important – persistent emergent wetlands that includes both submersed and floating plants.

As visual evidence, I've included five Morgan Lake photos taken by retired Circuit Court Judge and noted scenic photographer Eric Valentine (www.praisephotography.com). Valentine publishes photos from places ranging from New Zealand to Ecuador to Afghanistan, but the much of his work focuses on the special beauty of Northeast Oregon—especially the Wallowa and Blue Mountains (where this lake is located), and Hells Canyon. These photos show some of the range of recreational activities that take place here year-round. Needless to say, Morgan Lake would not end up in Valentine's photos or calendars if 150 foot utility towers and lines were looming over it.

This site evaluation of Morgan Lake Park is flawed, sloppy, and factually inaccurate, with conclusions based on supposition rather than research. As such, the Council should reject Idaho Power's application to build the B2H line on the Morgan Lake "Alternative Route," as it would irreparably damage the scenic value of this gem of Eastern Oregon.

Sincerely,

Dr. Matthew J. Cooper
302 C Ave.
La Grande, OR 97850-1137

Attachments: five (5) photos of Morgan Lake by Eric Valentine











FAX COVER LETTER

August 22, 2019

Found on
Fax machine
5:00 PM
D.K. 8-22-19

Please deliver this transmission to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy

Fax No. 503-378-6457

This transmission is from: Steven H. Corey

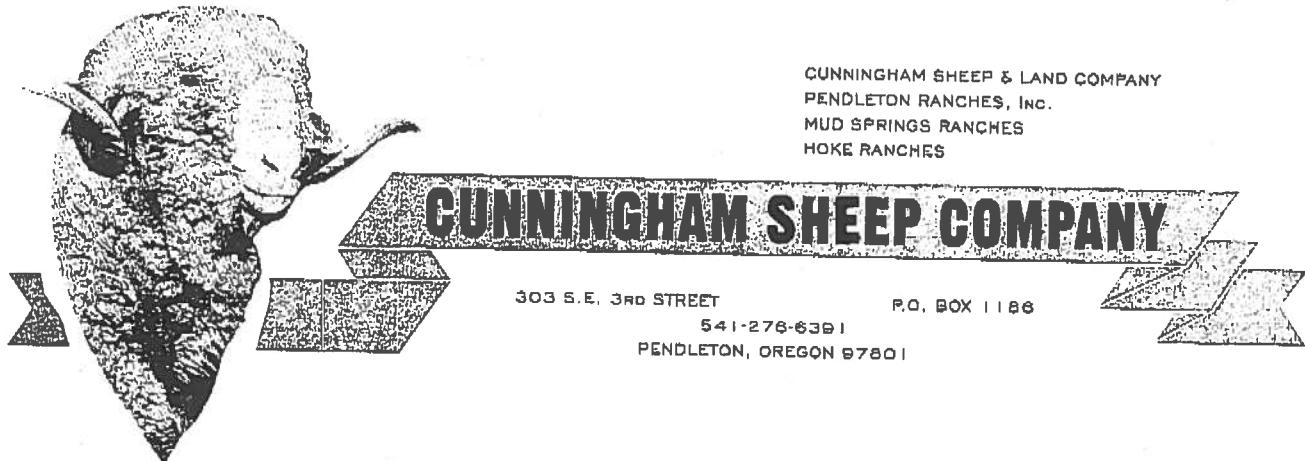
Re: B2H - Public Comments

No. of pages (including cover page): 3

Comments:

This document is also being sent to you by email.

The information contained in this facsimile transmission is confidential and is intended only for the use of the individual or entity to whom it is addressed. It may contain information protected by the attorney-client privilege. If the reader of this message is not the intended recipient, you are notified that any examination, review, disclosure, copying, distribution, or the taking of any action in reliance on the contents of this communication is strictly prohibited. If you have received this facsimile transmission in error, please notify us by collect telephone call to (541) 276-3331, and return the original facsimile to us at the address above via U.S. Postal Service.



303 S.E. 3RD STREET

P.O. BOX 1186

541-276-6391

PENDLETON, OREGON 97801

August 22, 2019

Hearing Officer

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

Our farming and ranching companies set forth on this stationery will be adversely affected by the crossing of our agricultural and forest lands in Umatilla County and parts of Union and Morrow Counties by the proposed B2H 500 kv power line. We continually opposed the positioning of the line starting with our attendance at what we believe was the first public notice and hearing in Boardman about 10 years ago. We have had multiple meetings with personnel of Idaho Power over the years, at our offices and in the field, and have not resolved our differences.

We continue our objection. Any siting of the line should avoid or minimize impacts. If impacts must be absorbed by private parties, the impacts should be minimized. We had been working with Idaho Power personnel on minimizing impacts to our property, but the last two meetings scheduled were postponed by Idaho Power. Our issues are still unresolved, and without minimizing or waiving our continuing objections, they include:

1. The taking of a 250' corridor of our high production timber land through the Meacham Lake area, including the siting of the corridor on our property as compared to an equalization of the siting impact on our property and our neighbors. Not only are we required to give up more of our forest land, but we lose our long-time efforts to protect wildlife and habitat. We suffer damage by the taking itself, but also to the remaining forest and grazing lands.
2. As the proposed line crosses McKay Creek both on and adjacent to our lands, its visual impact destroys a multi-purpose pasture we have. The line noise, presence of the line itself over the top of the entry gates to the main pasture, and visual site damage to the entire pasture, is terrible. The unknown adverse affects to our long-purposed protection of the

Hearing Officer

C/o Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy

Re: B2H

August 22, 2019

Pg. 2

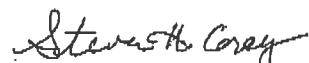
naturalness of the area will be permanently felt by our owners. We do not know the extent of damage to our cattle, sheep, forest and recreation pursuits, including future possible fire damage. Attempts to microsite adjustments to line location to lessen impacts were promised but have not occurred, and still need to be addressed.

3. The proposed line extends to the west across our properties. Similar damages will occur. In the area of our properties just west of Birch Creek, near Whitaker Flats, the line is sited across a wheat field. Micro-siting needs to occur to minimize impact and while that has been proposed by Idaho Power on the ground, with the cancellation of recent meetings, that has not occurred. We were to meet Idaho Power personnel on the west portions of our property to look at site location in the field, but that also has not occurred.

Even more significant, as we stated in the beginning, a wholly different route should occur for the transmission line through Umatilla County to take advantage of an existing electric transmission corridor, rather than the creating of a new additional electricity corridor across our property and property of our neighbors. The existing BPA line could be used, but we and others have been prejudiced by selection of this line as compared to negotiation with BPA and the Confederated Tribes on a line that would have little overall impact along an existing corridor as compared to adding a new corridor. Costs are not the only factor in siting of a line that will be in place for decades if not centuries. Idaho Power should be required to pay the price to the Confederated Tribes and long-term lease or acquire rights through the reservation, utilizing the existing corridor. This alternative has been ignored and pushed aside by the proponents in order to convince you there is a better way. This is false. The best way is to use the existing corridor. The failure to locate the transmission line in a manner that creates the greatest good and results in the least private injury will give rise to serious legal challenges to the authority to condemn necessary easements. These challenges will increase the project's cost, create uncertainty, and cause significant delay as they work their way through the court system.

Thank you. We appreciate the opportunity to comment.

Sincerely yours,



Steven H. Corey, Secretary

ESTERSON Sarah * ODOE

From: Charity Murphy <murphy@corey-byler.com>
Sent: Thursday, August 22, 2019 3:11 PM
To: B2H DPOComments * ODOE
Subject: B2H Public Comments
Attachments: B2H Project 8.22.19.pdf

Kellen,

Please find the attached letter in response to the B2H project.

Thank you,
Charity Murphy
Assistant to Steven H. Corey
Corey, Byler & Rew, LLP
Attorneys at Law
P.O. Box 218
Pendleton, OR 97801
(541) 276-3331

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THIS MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY VIA RETURN EMAIL, AND DESTROY THIS EMAIL AND ANY ATTACHMENTS THERETO.



CUNNINGHAM SHEEP & LAND COMPANY
PENDLETON RANCHES, INC.
MUD SPRINGS RANCHES
HOKE RANCHES

CUNNINGHAM SHEEP COMPANY

303 S.E. 3RD STREET

P.O. BOX 1186

541-276-6391

PENDLETON, OREGON 97801



August 22, 2019

Hearing Officer

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

Our farming and ranching companies set forth on this stationery will be adversely affected by the crossing of our agricultural and forest lands in Umatilla County and parts of Union and Morrow Counties by the proposed B2H 500 kv power line. We continually opposed the positioning of the line starting with our attendance at what we believe was the first public notice and hearing in Boardman about 10 years ago. We have had multiple meetings with personnel of Idaho Power over the years, at our offices and in the field, and have not resolved our differences.

We continue our objection. Any siting of the line should avoid or minimize impacts. If impacts must be absorbed by private parties, the impacts should be minimized. We had been working with Idaho Power personnel on minimizing impacts to our property, but the last two meetings scheduled were postponed by Idaho Power. Our issues are still unresolved, and without minimizing or waiving our continuing objections, they include:

1. The taking of a 250' corridor of our high production timber land through the Meacham Lake area, including the siting of the corridor on our property as compared to an equalization of the siting impact on our property and our neighbors. Not only are we required to give up more of our forest land, but we lose our long-time efforts to protect wildlife and habitat. We suffer damage by the taking itself, but also to the remaining forest and grazing lands.
2. As the proposed line crosses McKay Creek both on and adjacent to our lands, its visual impact destroys a multi-purpose pasture we have. The line noise, presence of the line itself over the top of the entry gates to the main pasture, and visual site damage to the entire pasture, is terrible. The unknown adverse affects to our long-purposed protection of the

Hearing Officer
C/o Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy
Re: B2H
August 22, 2019
Pg. 2

naturalness of the area will be permanently felt by our owners. We do not know the extent of damage to our cattle, sheep, forest and recreation pursuits, including future possible fire damage. Attempts to microsite adjustments to line location to lessen impacts were promised but have not occurred, and still need to be addressed.

3. The proposed line extends to the west across our properties. Similar damages will occur. In the area of our properties just west of Birch Creek, near Whitaker Flats, the line is sited across a wheat field. Micro-siting needs to occur to minimize impact and while that has been proposed by Idaho Power on the ground, with the cancellation of recent meetings, that has not occurred. We were to meet Idaho Power personnel on the west portions of our property to look at site location in the field, but that also has not occurred.

Even more significant, as we stated in the beginning, a wholly different route should occur for the transmission line through Umatilla County to take advantage of an existing electric transmission corridor, rather than the creating of a new additional electricity corridor across our property and property of our neighbors. The existing BPA line could be used, but we and others have been prejudiced by selection of this line as compared to negotiation with BPA and the Confederated Tribes on a line that would have little overall impact along an existing corridor as compared to adding a new corridor. Costs are not the only factor in siting of a line that will be in place for decades if not centuries. Idaho Power should be required to pay the price to the Confederated Tribes and long-term lease or acquire rights through the reservation, utilizing the existing corridor. This alternative has been ignored and pushed aside by the proponents in order to convince you there is a better way. This is false. The best way is to use the existing corridor. The failure to locate the transmission line in a manner that creates the greatest good and results in the least private injury will give rise to serious legal challenges to the authority to condemn necessary easements. These challenges will increase the project's cost, create uncertainty, and cause significant delay as they work their way through the court system.

Thank you. We appreciate the opportunity to comment.

Sincerely yours,



Steven H. Corey, Secretary

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT

* See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: 6/20/19 Location: La Grande, Ore.
REGISTRATION FOR PUBLIC COMMENT

Name: Cheryl Cosgrove

Address: 407 Main Ave, La Grande, OR. 97850

I represent (if applicable) Cheryl Cosgrove, RN, MN, CEN

Please print your name OR your organization/business name.

Send me future notifications about Council meetings via email.

My email address is: dbrcmc@frontier.com

I wish to address the Energy Facility Siting Council and/or

I wish to submit the following written comment:

Please stop this Bx1t project, this is NOT wanted and NOT needed in our county. This is outdated technology, destructive to the environment, has no value to Oregonians and needs to go away. Idaho Power, go get your power in Idaho, gut your rate payers for your profits. These power lines will destroy La Grandes viewshed, poison our local watershed, kill bees, birds, nature's wildlife and our citizens. The stress this insane project has loaped our county citizens is already causing illness. Please DO NOT poison our environment and citizens, GO HOME!

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

How to Testify at Energy Facility Siting Council Meetings and Public Hearings:

State your name and address for the record and indicate whether you are speaking for yourself or for a group.

Keep your statement concise. Often the Council will inform the public how much time can be given to each person testifying.

Begin your statement by stating whether you support or oppose the particular agenda item and why. Describe how the issue(s) affects you or your group and feel free to suggest a solution. If you are opposing the agenda item, discuss how you see the proposal as inconsistent with existing laws, rules or ordinances.

It may help to prepare an outline of your testimony to use while speaking. If you wish, you can leave this testimony with the Council.

ESTERSON Sarah * ODOE

From: B2H DPOComments * ODOE
Subject: FW: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/18; Draft Proposed Order dated 5/22/19

From: Cheryl Cogs rove <dbrcmc@frontier.com>
Sent: Thursday, August 22, 2019 5:02 PM
To: WOODS Maxwell * ODOE <Maxwell.Woods@oregon.gov>
Subject: Fwd: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/18; Draft Proposed Order dated 5/22/19

Sent from my iPad

Begin forwarded message:

From: Cheryl Cogs rove <dbrcmc@frontier.com>
Date: August 22, 2019 at 3:44:11 PM PDT
To: Kellen.Tardaewether@oregon.gov
Subject: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/18; Draft Proposed Order dated 5/22/19

Chair Bayeler and Council Members,
IP illegal noxious weed plan as well as their failure to respect or take into account in any way the Oregon Conservation Strategy is a reason to stop this project . Under the Oregon Conservation Strategy IPC's 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. This is not addressed or mentioned in IPC's application .

Please do not allow this project to move forward. As a critical care RN who has helped patients heal for over 40 years in our beautiful Grande Ronde Valley it sickens me to see the undeserved stress our community members have suffered because of IPC's presence. Stop B2H, please do no further harm to our community members and environment.

Cheryl Cosgrove RN, MN, CEN
La Grande, Oregon

Sent from my iPad

TARDAEWETHER Kellen * ODOE

From: Cheryl Cogs rove <dbrcmc@frontier.com>
Sent: Thursday, August 22, 2019 3:44 PM
To: TARDAEWETHER Kellen * ODOE
Subject: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/18; Draft Proposed Order dated 5/22/19

Chair Bayeler and Council Members,

IP illegal noxious weed plan as well as their failure to respect or take into account in any way the Oregon Conservation Strategy is a reason to stop this project . Under the Oregon Conservation Strategy IPC's 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. This is not addressed or mentioned in IPC's application .

Please do not allow this project to move forward. As a critical care RN who has helped patients heal for over 40 years in our beautiful Grande Ronde Valley it sickens me to see the undeserved stress our community members have suffered because of IPC's presence. Stop B2H, please do no further harm to our community members and environment.

Cheryl Cosgrove RN, MN, CEN
La Grande, Oregon Sent from my iPad

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,

Sandra K. Coulson

Signature

Printed Name:

Mailing Address:

Sandra K. Coulson
P.O. Box 177
Cove, OR 97824

RECEIVED

AUG 23 2013

DEPARTMENT OF ENERGY

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,

Sandra K Coulson

Name: P.O. Box 177

Address: Cove, OR 97824

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:

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,

Sandra K. Conlson
Name: Sandra K. Conlson
Address: P.O. Box 177 Cove, OR
La Grande, OR. 97850
97824

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, its 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,

Sandra K. Carlson

Signature

Printed Name: Sandra K. Carlson

Mailing Address:

P.O. Box 177
Cove, OR 97824

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,

Sandy Carlson

Signature

Sandra K Coulson

Printed Name:

Mailing Address: P.O. Box 177
Cove, OR 97824

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.

RECEIVED

AUG 22 2019

Department of Energy

Mr. & Mrs. Kirk Creech
P.O. Box 554
La Grande, OR 97850-0554



To: Energy facilities Siting Council
c/o Karen Tadavosky, Senior Siting Analyst
Oregon Dept. of Energy
550 Capitol St. NE
Salem, Oregon 97301



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 Frank Kirkland Creech Frank K. Creech III
Signature Kathryn Creech Printed Name: Kathryn Creech

Mailing Address: 95 Walnut St.
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.*

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing $\frac{1}{4}$ 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.

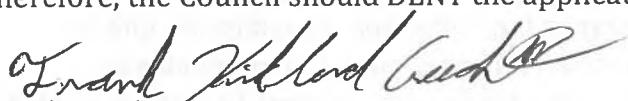
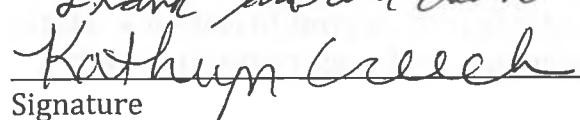
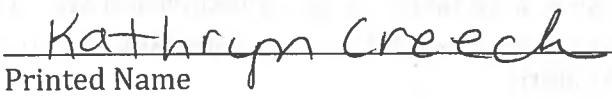
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming 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 

Mailing Address:

95 Walnut St.
LaGrande, OR 97850

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 1/4 mile (1,320 ft.)

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:

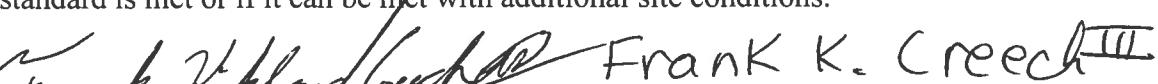
APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

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: Kathryn Creech
Mailing Address: 95 Walnut St.
La Grande, OR 97850

ESTERSON Sarah * ODOE

From: Juanette <jjmd@eoni.com>
Sent: Tuesday, August 20, 2019 9:59 PM
To: B2H DPOComments * ODOE
Subject: Comments - B2H Transmission Line
Attachments: bh2.docx

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol Street N.E.

Salem, Oregon 97301

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Juanette Cremin

805 N Avenue

La Grande, Oregon 97850

541-963-4725

jjmd@eoni.com

August 19, 2019

To: Chairman Beyeler and Members of the Council

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

There are so many reasons, big and small, to dispute the incursion of the Boardman to Hemingway transmission line across Eastern Oregon.

Small, like:

- destruction of our community's view shed – something we in La Grande treasure, and promote as a plus for our small town.
- Or the impact of construction traffic in the neighborhoods along the route of the proposed gargantuan towers. Neighborhoods where children live and play. Neighborhoods housing K-12 schools. Neighborhoods where the hospital is located.

But there are much more huge issues needing to be addressed.

Longevity – There are serious questions being raised about the actual need for this project to go forward. Idaho Power claims the transmission line will remain in service for perpetuity. There are no references or hard data to support this optimistic estimate. In fact, 500-kV long-distance transmission lines were first built in the 1960s. This same argument is being used for the “Sams Valley Reinforcement Projects” by PacifiCorp.

Over the last 50 years, wind power, solar power, local distributed energy, including new battery storage will certainly affect long-distance transmission lines. Cancellation of 500-kV projects, such as Cascade Crossing and Colusa-Sutter in California, are specific illustrations of changes being made by forward-thinking executives.

Landscape Stability — 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, a catastrophic mudslide occurred in Oso, Washington, 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. In the area downslope 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 downslope from the proposed towers. At least 100 homes are positioned downslope 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 the landscape disruption inevitable in the construction and placement of the proposed transmission line.

Wildfire — 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 two years. This includes the catastrophic 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), 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 and the three K-12 schools in the area. 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, the hospital and three schools in ten minutes. This is frightening and an unacceptable risk for our citizens.

In Summary -- The current proposal for a Boardman to Hemingway transmission line is operating on old data with respect to the reasonable expectation of its need and longevity. Nor does it take into consideration the risk the siting or operation of the transmission line puts on the community of La Grande. Suggesting landslide risk will somehow be mitigated when the time comes to build is a foolish and irresponsible proposal. Worse the B2H 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.

Thank you for considering my comments in this critical decision-making effort.

Sincerely,

Juanette Cremin

805 N Avenue

La Grande, Oregon

We don't inherit the earth from our ancestors, we borrow it from our children. — Wendell Berry

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

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Juanette Cremin
805 N Avenue
La Grande, Oregon 97850

541-963-4725

jjmd@eoni.com

August 19, 2019

To: Chairman Beyeler and Members of the Council

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

There are so many reasons, big and small, to dispute the incursion of the Boardman to Hemingway transmission line across Eastern Oregon.

Small, like:

- destruction of our community's view shed – something we in La Grande treasure, and promote as a plus for our small town.
- Or the impact of construction traffic in the neighborhoods along the route of the proposed gargantuan towers. Neighborhoods where children live and play. Neighborhoods housing K-12 schools. Neighborhoods where the hospital is located.

But there are much more huge issues needing to be addressed.

Longevity – There are serious questions being raised about the actual need for this project to go forward. Idaho Power claims the transmission line will remain in service for perpetuity. There are no references or hard data to support this optimistic estimate. In fact, 500-kV long-distance transmission lines were first built in the 1960s. This same argument is being used for the “Sams Valley Reinforcement Projects” by PacifiCorp.

Over the last 50 years, wind power, solar power, local distributed energy, including new battery storage will certainly affect long-distance transmission lines. Cancellation of 500-kV projects, such as Cascade Crossing and Colusa-Sutter in California, are specific illustrations of changes being made by forward-thinking executives.

Landscape Stability -- *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, a catastrophic mudslide occurred in Oso, Washington, 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. In the area downslope 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 downslope from the proposed towers. At least 100 homes are positioned downslope 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 the landscape disruption inevitable in the construction and placement of the proposed transmission line.

Wildfire -- 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 two years. This includes the catastrophic 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), 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 and the three K-12 schools in the area. 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, the hospital and three schools in ten minutes. This is frightening and an unacceptable risk for our citizens.

In Summary -- The current proposal for a Boardman to Hemingway transmission line is operating on old data with respect to the reasonable expectation of its need and longevity. Nor does it take into consideration the risk the siting or operation of the transmission line puts on the community of La Grande. Suggesting landslide risk will somehow be mitigated when the time comes to build is a foolish and irresponsible proposal. Worse the B2H 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.

Thank you for considering my comments in this critical decision-making effort.

Sincerely,

Juanette Cremin
805 N Avenue
La Grande, Oregon

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

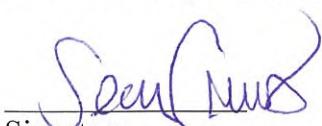
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous 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: *Sean Crews*

Mailing address:

703 MAIN AVE
LA GRANDE, OR 97850

Email address:

phone number: (optional)

TARDAEWETHER Kellen * ODOE

From: steve culley <Steveculley@live.com>
Sent: Tuesday, June 18, 2019 3:42 PM
To: B2H DPOComments * ODOE
Subject: B2H comments
Attachments: B2h.docx

Steve Culley 2249 Virginia Ave
Baker City, Ore. 967814

B2H

Steve Culley

I recently attended a B2H, Boardman to Hemingway, meeting on Idaho Power's requested to build a multimegawatt power line from Boardman Oregon to Hemingway Idaho near Boise.

I am opposed. Some background. When I was somewhat younger, 1962 or 63 I was fishing the Powder River Canyon several miles below Thief Valley Dam and hooked two silvers sided steelhead. Man, those fish were bright for being so far from the ocean. I later pulled one up onto the road out of Big Creek at the mouth of a little stream called Lick Creek. My brother and father hooked two in Velvet Creek near where it runs into Big Creek. In those years on the farm if the hay got put up we would have a family excursion for a few days on Eagle Creek. We camped at Skookum Creek. Kids with fly rods could catch dozens of fish during the day and near night fall the pool at Skookum Creek would come alive with smaller trout rising to flies. We didn't know much about fisheries, just being farm kids, but those trout that we caught all day long were steelhead smolts and the smaller ones in the evening were salmon smolts.

Things started down hill with the approval of Brownlee dam Oxbow and Hells Canyon Dams, with no fish ladders in 1958. Fish runs were abandoned in 1963. Warnings that the infamous Rube Goldberg contraption above Brownell to trap and haul migrating smolts would be a failure mattered not and much money was saved to supply cheaper power to the region, and it is cheaper if you discount blocking hundreds of miles of anadromous fish producing streams. That deficit is made up for with hatcheries that are financed partly by a surcharge on your

electric bills. Out of sight out of mind cheap power , fish runs on the brink of extinction, recreational fisherman, high seas fishermen, cannery workers, guides etc. are out of luck but if the destruction of the largest area of salmon, steelhead sturgeon and sea run Dolly Vardon counts for nothing then cheap it is. Destruction of riparian zone habitat was supposed to be mitigated by Idaho Power and somehow they forgot to do that for almost 50 years until the relicensing process was about to begin. The purchase of the big Daley Creek Ranch south of richland and dumping of some salmon and steelhead into the boise and Powder Rivers was nothing but a short- term public relations stunt. Recent efforts by the state of Oregon to install fish ladders in the canyon was defeated and put off for 20 years. Sure would have been a lot of construction jobs there. Oh well the power line will create jobs.

One thing that is not mentioned on the B2H line. It does not end at Hemingway. It will connect with other power grids. We used to call this as the Western intertie . Rocky Mountains to the Pacific, connect it all together. Modern efficient power generation and distribution, designed by the same people who lined up all the battle ships and airplanes at Pearl Harbor. All the eggs in one basket where one smart guy with a computer can make a third Of the United States go dark.

For decades we have fought over the management of BPA hydro electric power on the Columbia dams. Salmon and steelhead flushes where water is released to move smolts downstream, Columbia River water is more than spoken for. Any power distribution scheme that could alter the balance of salmon and steelhead and sturgeon is just begging for an endangered species act lawsuit. If that doesn't scare the B2H advocates then there is the Treaty of 1855 and the Bolt Decision and tribal rights.

The Hells Canyon Complex with no passage was one of the biggest environmental blunders ever, compounding that with the biggest white elephant power scheme is not real smart.

ESTERSON Sarah * ODOE

From: Suni & Charlie Danforth <cdsj@yahoo.com>
Sent: Tuesday, August 20, 2019 9:18 PM
To: B2H DPOComments * ODOE
Subject: Danforth letter regarding B2H
Attachments: Danforth letter concerning fire dangers.docx

To whom it may concern,

Please submit my letter to EFSC prior to the next B2H meeting/hearing.

Thank you,
Suni B. Danforth
Milton Freewater, OR

August 19, 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 all of the citizens of La Grande and those visitors who recreate in this area as well 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,

Suni B. Danforth
225 Maple Ave.
Milton Freewater, OR. 97862

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 PI-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 *Michael D. Daniels*
Address: *1802 2nd St*
La Grande OR
97850

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

COMMENT REGARDING THE FAILURE TO PROVIDE HABITAT MITIGATION FOR IMPACTS TO MIGRATORY BIRDS

The Oregon Department of Energy and Energy Facility Siting Council have failed to honor federal laws regarding protected species. This does not eliminate the requirement that site certificates provide mitigation for habitat loss due to ODOE and EFSC authorized energy developments.

In their letter to Don Gonzales, BLM, dated Mar. 19, 2015, (contained in the EIS material), the US Fish and Wildlife Service identified necessary mitigation requirements for habitat impacts to federally protected Migratory Birds resulting from the "(e.g. permanent removal of more than 800 acres of forested habitat, plus additional danger trees removed outside of right-of-way over the life of the project)"

Due to the permanent nature of the habitat impacts, the mitigation for impacts must include the entire right-of-way, not just the bases of the transmission towers and other permanent structures. Related rules are OAR 345-022-0070 and OAR 635-415-0025.

The draft Proposed Order fails to provide adequate mitigation for impacts to habitat protected by federal law for migratory birds.


Signature/Name: *Mitchell D. Daniels*

Address: *1802 2nd ST*
Cd GRAVE, OK
97850

August 10, 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: Soil Protection - Drill site 96/4; 96/5; 97/1 on unstable and steep slopes

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground.

The applicable standard is: OAR 345-022-0022. (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 500kV 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 96/4; 96/5; 97/1 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:

5809AO; 5836AO; erosion hazard; rock outcrop, percent of slope Low; 2: High; 15. (sheet 3 and 4 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

96/4 – General

96/5 – Angle change along alignment

97/1 – Angle change along alignment

Daugherty
96 Oak
LaGrange, OR 97331

FORTLAND OR 97126
AUG 21 2019 PM 5 L



RECEIVED

AUG 21 2019

Department of Energy

Oregon Energy Facility Siting Council
c/o Kellen Tandaecker, Senior Siting Analyst
550 Capitol St. N.E.
Salem, OR 97301

07301-374293

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019

Dear Chair Beyeler and Members of the Council:

Please accept this letter as part of the public comment for the Idaho Power B2H Site Certificate Application. This letter discusses Idaho Power's compliance with Standard 345-022-0110-Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. This letter discusses the potential risks of wildfire caused by the construction and operation of the B2H Transmission line sited approximately 2000 feet from the city of La Grande, OR potentially threatening medium density housing, medical, and hospital facilities on the SW side of La Grande.

National Geographic has determined that wildfire can travel up to 6.7 miles per hour (mph) in timber and 14 mph in grasslands. A fast moving wildfire could consume residential areas and hospital facilities in La Grande in ten minutes; much faster than emergency providers could muster any kind of defense. The effect of transmission lines and wildfire are well documented especially when considering the recent events regarding transmission line generated wildfire impacts in Paradise, California. PG&E lines caused five of the ten most destructive fires in California since 2015. The Oregon Dept. of Forestry 2006 Communities at Risk Assessment rated the wildland urban interface in La Grande the #1 WIU fire risk in Oregon. The proposed B2H line in the La Grande area poses a much greater risk than the Paradise fire due to closer proximity to the WIU and greater regional fire risk.

Rural Fire Protection District crews in Union County are limited and mostly volunteer and are not equipped or staffed to handle potential wildfires generated by the proposed B2H transmission line. Estimates of response time of 4-8 minutes in Union County stated in the EFSC application (Table U-10) are unrealistic best-

case assumptions especially considering the limited access provided by the Morgan Lake Road. In addition, local fire crews have limited to no training in dealing with firefighting associated with transmissions lines and according to the Union County Emergency Services Manager, fire fighters' initial attack could be delayed if they have to wait for power lines to be de-energized. (U-1C-6).

Given the current capacity of fire protection services in Union County, the risks associated with the lines proximity to the La Grande WUI, and the huge fire risk the B2H Transmission line creates for the region both during construction and in operation, I urge the OEFSC to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway Transmission Line.

Sincerely,



Michael S. Daugherty
96 Oak St.
La Grande, OR 97850
daughem@eoni.com

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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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)(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,

Paul Davenport

Signature

Printed Name: PAUL DAVENPORT

Mailing Address:

10300~~0~~ W. Valley Ave
Island City, OR 97850

1112 1/2 Adams Ave
La Grande, OR 97850

RECEIVED
17 AUG 2019 PM
U.S. POSTAL SERVICE



Energy Facility Siting Counsel

Attn: V. Tardawatha

Oregon Dept. of Energy
550 Capitol St., NE

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Salem OR 97304-3742

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 affects 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,



A handwritten signature in black ink, appearing to read "Ruth Davenport, Ph.D.". Below the signature, the word "Signature" is written in a smaller, printed font.

Printed Name:

M. Ruth Davenport

Mailing Address:

2109 Oak St.

Email:

ruthi.oakhaven

@gmail.com

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



M. Ruth Davenport

Printed Name:

Mailing Address:

2109 Oak St. 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.

ESTERSON Sarah * ODOE

From: B2H DPOComments * ODOE
Subject: FW: comment on proposal
Attachments: Stopb2h letter.docx

From: D4D <d4d@q.com>
Sent: Wednesday, August 21, 2019 10:34 AM
To: B2H DPOComments * ODOE <B2H.DPOComments@oregon.gov>
Subject: comment on proposal

Please see attached document

August 21, 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.

It is important to understand that isolated scenic/historic areas are, more and more, becoming rare; a thing of the past. We must ensure that future generations are allowed to visit and appreciate visually these isolated areas that we have known and enjoyed in our lifetimes. The historically isolated areas in question are part of our Oregon Heritage and must be preserved.

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,

Steven M. DeFord

Mailing Address: 40155 Rhody Road, Baker City, OR 97814

Email: d4d@q.com

--
The Only Thing Necessary for the Triumph of Evil is that Good Men Do Nothing.

August 21, 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.

It is important to understand that isolated scenic/historic areas are, more and more, becoming rare; a thing of the past. We must ensure that future generations are allowed to visit and appreciate visually these isolated areas that we have known and enjoyed in our lifetimes. The historically isolated areas in question are part of our Oregon Heritage and must be preserved.

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,

Steven M. DeFord

Mailing Address: 40155 Rhody Road, Baker City, OR 97814

Email: d4d@q.com

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT

*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)

Date: 20 Jun 2019 Location: LA GRANDE OR

REGISTRATION FOR PUBLIC COMMENT

Name: Bill DeLashmunt

Address: 64813 Hwy 237

I represent (if applicable) Bill DeLashmunt

Print your name OR your organization/business name.

Send me future notifications about Council meetings via email.

My email address is: _____

I wish to address the Energy Facility Siting Council and/or

I wish to submit the following written comment:

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

Page 134

1 MR. JOHN WINTERS: I'll be brief. Thank you
 2 very much for being here tonight. It's a long day for
 3 you guys, I'm sure. And I hope you get to enjoy our
 4 beautiful valley a little bit while you are here.

5 John Winters, W-i-n-t-e-r-s, I live at 60214
 6 Morgan Lake Road, La Grande.

7 And being at Morgan Lake, I go up and down the
 8 hill a lot, and there are some summers where you are
 9 afraid to walk through the grass it gets so dry. I'm
 10 just afraid some time it's going to blow up in fire. So
 11 I am just going to speak to the possibility of any
 12 increase in fire risk is something that doesn't make a
 13 lot of sense to me.

14 Especially in light of California's
 15 experience, it just occurred to me that the fire risk is
 16 a little underappreciated. Five of the ten most
 17 destructive fires since 2015, as you may well know, are
 18 linked to the PG&E network. PG&E is now bankrupt. They
 19 have 50 lawsuits and \$30 billion in liabilities. And I
 20 kind of wonder if Idaho Power wants to go that route.

21 Californians are served by PG&E. Idaho Power
 22 does not serve any Oregonians. So it's not as if we are
 23 getting anything out of the deal.

24 Paradise, interestingly, is somewhat similar
 25 to La Grande. Its elevation is 1,800 feet; we are about

Page 136

1 firefighters from Australia, they had almost 300
 2 engines, 4,300 law enforcement and 2,300 National Guard.
 3 I just don't get the impression that Idaho
 4 Power takes very seriously the even small increase in
 5 risk that they may present with their power line, and
 6 it's us that is going to have to be paying the price.

7 So that is all I have to say. Thank you very
 8 much for your time.

9 HEARING OFFICER WEBSTER: Thank you.
 10 On deck is Rod Muilenburg. But first we have
 11 Mr. DeLashmutt.

12 MR. BILL DeLASHMUTT: My name is Bill
 13 DeLashmutt, and I'm here representing myself. Thank you
 14 for the opportunity to present my thoughts about the
 15 B2H.

16 I am speaking in support of the B2H, and
 17 invite you to consider some of the reasons for
 18 supporting the line and the effect on our lives.

19 I understand the concerns of the opposition,
 20 particularly those of you on the route or near the
 21 route; that has to be hard. So I have a question to
 22 start things with, and nobody has to answer it, but did
 23 you apply the brakes on your car and increase energy
 24 consumption as you drove to the meeting? When you have
 25 the heat on in your house, do you open the windows and

Page 135

Page 137

1 1,200 feet. They are about twice the population of
 2 La Grande. And they get three times as much rain as we
 3 do. So we are a far more arid region than they are, and
 4 we do get winds coming through here and drying patterns.

5 I talked to John Punches, OSU Extension
 6 forester here, and he demurred on the B2H question, but
 7 he did say that they are tracking weather and there is
 8 more hotter days -- the days are hotter and there is
 9 more of them. He says it only takes a couple of extra
 10 hot days for a tree to turn the corner and to stress a
 11 tree and it will die usually by the next year. He is
 12 seeing a pattern, as we've probably all heard, that
 13 things are going in that direction. So to me it makes
 14 no sense to invite an additional risk when we have got
 15 plenty of existing risks as it is.

16 The proposal states in Exhibit U, 3.5.6.2,
 17 Exhibit U, it says: The project is not expected to have
 18 significant adverse impacts on fire protection as
 19 they've talked to all the various volunteer units along
 20 the way.

21 I wonder what California would say. Cal Fire,
 22 again, I talked to them; they wouldn't comment. But the
 23 Santa Rosa Fire Chief has been quoted as saying, they
 24 have 17 states that -- I believe it was the Woolsey
 25 Fire, they had firefighters from 17 states. They had

1 heat the outside air? Of course the answer is no. That
 2 wouldn't be smart. We should not ask Idaho Power,
 3 PacifiCorp, and Bonneville Power Administration to waste
 4 energy either.

5 I want to discuss power line losses and a few
 6 causes. We are all concerned about energy efficiency.
 7 So are Idaho Power Company, PacifiCorp, and Bonneville
 8 Power Administration. B2H will lower line losses. I
 9 can help you visualize that. Power line temperature
 10 rises when you add load to the line. The larger the
 11 load, the hotter the line becomes. This is a problem
 12 with the existing system. And we are wasting energy.
 13 B2H will lower the line losses on the existing system.

14 If you force Idaho Power Company, PacifiCorp,
 15 and Bonneville Power Administration to operate without
 16 B2H, you are doing the same thing as driving your car
 17 with the brake applied and turning up the heat in your
 18 house while you open the windows.

19 Idaho Power Company is demonstrating good
 20 corporate practices by providing low-cost power that is
 21 in the bottom 10 percent of the nation. Idaho Power
 22 Company provides you power at 25 percent less cost than
 23 the national average. That is good corporate practice.

24 Wind farm activity increases losses. We all
 25 talk about microgrids that locate power generation close

Page 138

1 to your home. Microgrids would be nice. Instead the
2 trouble is we are locating wind farms such as the one in
3 the once naturally scenic Pyles Canyon south of
4 La Grande, the wind farms and once beautiful Columbia
5 River Gorge, and the wind farm in the once scenic Burnt
6 River Canyon on the way to Boise.

7 These unreliable sources of energy are far
8 from your home and the load they serve. These energy
9 sources load the power lines and increase power line
10 losses. This unnecessary transport of very unreliable
11 power has created the need for more ability to transport
12 power.

13 Idaho Power, PacifiCorp, and Bonneville Power
14 Administration are responding to the requirements that
15 power be maintained to your house whether or not the
16 wind is blowing, and they are keeping this power system
17 together whether or not the wind is blowing.

18 A big item in our lives is electric cars.

19 Transportation accounts for a huge part of our national
20 energy usage. We want to be able to provide energy for
21 electric cars. Electric cars hog a lot of electric
22 power. That will require nearly double the electric
23 output of our power system. Let's don't stall electric
24 cars because of stalling a power line.

25 Please don't pass the mess of a weak

Page 139

1 infrastructure of our power system to our children and
2 all the people in the Northwest. Let's allow Idaho
3 Power Company, PacifiCorp, and Bonneville Power
4 Administration to drive without their brakes on. Let's
5 allow Idaho Power Company, PacifiCorp, and BPA to heat
6 their house with the windows closed.

7 If we want to have unreliable energy sources
8 such as the wind farms located far from where the
9 electric load is, let's provide the power lines to carry
10 the load and maintain system stability. If we want to
11 provide for a huge electrical energy increase to support
12 electric vehicles, then Idaho Power Company, PacifiCorp,
13 and BPA have the power lines they need to handle the
14 load.

15 I understand your feelings about where to put
16 the line. Let's not allow our power system to become an
17 obsolete mess for our children. Let's figure out the
18 best place to locate B2H. Please make some siting
19 suggestions to the Commission and to Idaho Power
20 Company.

21 Thank you.

22 HEARING OFFICER WEBSTER: Thank you.

23 MR. ROD MUILENBURG: My name is Rod
24 Muilenburg. I reside at 412 16th Street, La Grande,
25 Oregon.

Page 138

Page 140

1 From what I am understanding this form
2 provided by Idaho Power, the long and short, from what I
3 understand, Oregon is supposed to take one for the team
4 for the sake of Idaho. That makes me wonder. What is
5 it about the Idaho infrastructure and Idaho's power grid
6 that determines the demand from Oregon? It also makes
7 me wonder, why is it that you insist it be in our
8 backyard and not in your backyard?

9 I've been here my whole life. I remember the
10 fire of '73. I remember how hard people worked to save
11 their houses. I remember the sun disappearing, and I
12 remember a tinder box ready to go. And you want to go
13 with an overhead power system that the world doesn't
14 even recognize anymore. The world puts power grids
15 underground today. It's the future. It's how we do it.
16 You are taxing a system that doesn't have to be taxed.
17 These lines, they inevitably are overtaxed, and they
18 droop, they hang, and they cause fires. And as I said,
19 we've have got a tinder box surrounding us.

20 I don't know if we want to go through the
21 inevitable again of having another fire. I don't know
22 if we want to suffer the inevitable outcome that
23 happened to Paradise, California, when they had only
24 time enough to grab their purse and wallet and the
25 shirts on their backs before their house was rendered to

Page 139

Page 141

1 a mere foundation and a fireplace and the rest is a
2 toxic waste element. Do we want to go through that?

3 And then I heard only yesterday that a diamond
4 factory in Washington is going to demand enough voltage
5 to supply 10,000 people to manufacture synthetic
6 diamonds. I don't know when this ends.

7 But I've listened to all these people behind
8 me talking about the eyesore we are going to see,
9 talking about the impact. And they are mentioning
10 things I haven't even considered; hearing problems,
11 sound transmission lines. There's a whole lot involved
12 that we have just barely touched the tip of the iceberg.
13 And is it a requirement that Idaho have its power in the
14 first place?

15 I don't know, I am just thinking we have got a
16 lot of small cities, too, with the prevailing winds
17 around this area, Ukiah, and all these little cities
18 surrounding here, and how bad will it be? Is there
19 enough fire suppression? Is there enough accountability
20 for the environmental impact?

21 I don't think anybody here has weighed this
22 whole thing out until they attended this forum tonight.
23 Which, by the way, I appreciate you putting it on. I
24 appreciate you being here. I appreciate Idaho Power for
25 allowing us to voice our opinions.



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*) WHIT DESCHNER

Mailing Address (*mandatory*) 1640 3RD ST
BAKER CITY, OREGON 97814

Phone Number (*optional*) (541) 519 2736 Email Address (*optional*) _____

Today's Date: JUNE 19 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.)

<p style="text-align: right;">Page 30</p> <p>1 ag industry without mitigation, and we will provide a 2 detailed summary of those impacts. 3 Probably one that's near and dear to our 4 hearts is that the county ag producers and Idaho 5 Power -- and I want to compliment the field staff, they 6 have worked closely with that -- but bureaucracies, be 7 what they may, it hasn't come. We've requested a line 8 placement movement, a micrositing, within the Durkee 9 area, and at this point it hasn't occurred. And we 10 would request, as a condition of approval, that the 11 Council direct that this occur. That it meets the 12 needs, that, once again, that it causes the least impact 13 to the landscape and to those managing the land here and 14 to the residents. Once again, these residents are in 15 excess of 65, 70 years old, and impacting their entire 16 life and their way of life is just really tough. 17 We also, in closing, request that the Baker 18 County comprehensive land use plan requirement of 19 benefit to Baker County be met in that a guaranteed 20 point of presence be placed in Baker County to serve as 21 mitigation to meet future requirements for needs of the 22 economy of Baker County. 23 Are there any questions? 24 HEARING OFFICER WEBSTER: No. Thank you. 25 MR. MARK BENNETT: Thank you very much.</p>	<p style="text-align: right;">Page 32</p> <p>1 MR. WHIT DESCHNER: OAR 345-025-0007, the real 2 issues. 3 Ethics. 4 (a) in 2007, B2H was announced. No vote was 5 offered whether the people wanted it or not. 6 (b) Under Governor Tom McCall, an energy 7 corridor was established for high-voltage power line 8 routes. It was a low-impact route. When Idaho Power 9 proposed B2H, they either ignored or deemed this route 10 too costly. 11 (c) Idaho Power is a for-profit corporation 12 traded on the New York Stock Exchange. 13 Roman numeral i. This brings up conflicts of 14 interests. What is right for IPC's shareholders is not 15 always in the best interest of the public. Idaho Power 16 Corporation will turn a profit to satisfy shareholders 17 at the expense of Baker County and eastern Oregon. With 18 sparse population, Idaho Power rides roughshod through 19 the county, dictating how and where they choose to run 20 the line. 21 Also, Roman numeral ii. A crooked playing 22 field. Opponents are not given adequate or the same 23 amount of time as Oregon Department of Energy or Idaho 24 Power to review new documents or developments. 25 And Roman numeral iii. Skewered data, like</p>
<p style="text-align: right;">Page 31</p> <p>1 HEARING OFFICER WEBSTER: After we hear from 2 Mr. -- assuming it's Mr. Deschner, it will be Karen 3 Yeakley. 4 MR. WHIT DESCHNER: My name is Whit Deschner. 5 I live at 1640 3rd Street, Baker. 6 I want to preempt this speech, out of 7 frustration, if I say anything to Idaho Power about 8 Idaho Power, please don't take it personally. You're 9 probably real nice people. 10 I appreciate the Council for hearing me. And 11 I appreciate Marcy Grail for recusing herself off of 12 this case. And also I want to thank Mark Bennett and 13 Holly for their work on this. 14 Upon reviewing the discrepancy in the 20,000 15 or so EFSC standards in Oregon Administration Rule, I 16 have found a serious flaw. Oregon Administration Rule 17 345-025-0007 is missing. Upon further investigation, I 18 discovered that the key set of OARs was redacted with 19 white-out. I failed to find the original version but I 20 have a good idea why this was omitted. Unfortunately, I 21 can't replicate the legalese of this administrative rule 22 nor do I speak the language but I can give you the gist. 23 HEARING OFFICER WEBSTER: Mr. Deschner, if you 24 want to slow down just a stitch so that the court 25 reporter can take everything down.</p>	<p style="text-align: right;">Page 33</p> <p>1 averaging numbers to falsify state or bend IPC's 2 position. 3 (d) The Interpretive Center opened in 1992 4 through a highly effective partnership of local, state, 5 and federal government agencies, nonprofit 6 organizations, and local residents. I'll read that 7 again. 8 The Interpretive Center opened in 1992 through 9 a highly effective partnership of local, state, and 10 federal government agencies, nonprofit organizations, 11 and local residents. There was a gentlemen's 12 understanding that nothing would be built in the 13 viewshed of the Center, nor did anyone dream that the 14 view would be degraded in such a manner. Nothing was 15 signed but this was Baker and handshakes were valid and 16 honored. 17 (e) Idaho Power is proposing to blatantly run 18 their up to 190-foot tall pylons in front of the BLM's 19 Oregon Trail Interpretive Center. Where is the BLM's 20 voice in all of this? Why are they allowing a 21 corporation to build in front of the BLM historical 22 center, ruining the whole historical presentation of 23 what the taxpayers' \$16 million national showcase 24 interpretive center represents? 25 Conclusion.</p>

<p style="text-align: right;">Page 34</p> <p>1 (a) Idaho Power is a large, powerful 2 corporation bullying its way through a small rural 3 community just because it can. Regard their contractual 4 agreement to provide fish ladders on the dams they built 5 on the Snake, but then reneged on their obligation once 6 the dams were up and running. They cannot be trusted. 7 There are no repercussions in place if they won't and 8 don't follow up on their promises and again, we, the 9 local citizens, have to live with the damages.</p> <p>10 (b) Morals and decency have been thrown out 11 the window. Money and greed are trying to replace them. 12 If approved, Idaho Power is guaranteed an \$80 million 13 profit for itself and their partners' shareholders. 14 What does Baker get?</p> <p>15 (c) This process needs to ask bigger 16 questions. B2H is the subject to a vetting system that 17 can't and never has said no to other similar projects, a 18 vetting system that is allowing this boondoggle to get 19 its rubber stamp. This process needs a non-partial 20 forum for fairness, a council made up of people not 21 picked or reinstated by a governor who was backed by 22 PacifiCorp, Idaho Power's silent partner in B2H.</p> <p>23 (d) While these hearings are supposed to bring 24 out the flaws in the proposed plan, they also help Idaho 25 Power plug their leaking dike. These are problems Idaho</p>	<p style="text-align: right;">Page 36</p> <p>1 return on their investment. This has been 12 years, and 2 if I was on the Idaho Power board, I would be asking if 3 this was the best investment. I'd be jumping up and 4 down wondering, why can't we get this done? If it was 5 that necessary 12 years ago, it should be even more 6 necessary today. There is new technology, and the data 7 used is not current nor represents residents' input 8 along the proposed route.</p> <p>9 I'm old school, I was raised differently. I 10 was taught to give more here while I was here before I 11 leave. I've never seen too many people leave with their 12 wagon full of their goodies off to heaven. So that's 13 why I volunteer and do things. And I appreciate your 14 time in volunteering, too. It's not an easy job. 15 Believe me, I understand that.</p> <p>16 In your siting standards of protecting against 17 adverse environmental impacts, this project, due to 18 construction, will have significant adverse impacts. 19 Construction decreases farmland that affects our food 20 source, the wildlife, pollinators like bees and 21 butterflies, and cattle grazing.</p> <p>22 Oregon Administrative Rules and Council 23 standards have numerous references to mitigation. 24 Mitigation will not help dead eagles, dead owls, dead 25 blue heron, dead ducks, dead geese, dead hawks, dead</p>
<p style="text-align: right;">Page 35</p> <p>1 Power should have already foreseen if they had planned 2 better.</p> <p>3 (e) I have fought this B2H proposal since near 4 the beginning. It was a bad idea then and it's an even 5 worse idea now.</p> <p>6 (f) All we, the public, would like in this 7 process is impartiality and that we have not been given. 8 Thank you.</p> <p>9 HEARING OFFICER WEBSTER: Thank you. 10 After we hear from Ms. Yeakley, we'll hear 11 from Irene Gilbert.</p> <p>12 MS. KAREN YEAKLEY: I made copies for the 13 Council and the Department of Energy.</p> <p>14 HEARING OFFICER WEBSTER: Start with your name 15 and address.</p> <p>16 MS. KAREN YEAKLEY: Yes.</p> <p>17 HEARING OFFICER WEBSTER: Thank you.</p> <p>18 MS. KAREN YEAKLEY: For the record, my name is 19 Karen Yeakley. I'm a former mayor of Baker City and the 20 former manager of the Baker County Chamber of Commerce, 21 and former president of the Chamber.</p> <p>22 Let's be clear, Idaho Power is a profit-making 23 business. They are in business to make money. The 24 board of directors have a fiduciary responsibility to 25 protect the investment and provide shareholders with a</p>	<p style="text-align: right;">Page 37</p> <p>1 trumpeter swans, and dead sage-grouse that we've so hard 2 and diligently tried to protect.</p> <p>3 It will not protect the Oregon Trail ruts at 4 the Interpretive Center. I watch from my house busloads 5 of students in May headed up to the center to learn of 6 our history from across the state. Use of compensatory 7 mitigation is not okay; dead is dead. It will not come 8 back. The land will not come back. You cannot mitigate 9 that, and you cannot buy off property and values and the 10 way of life in Baker County.</p> <p>11 We should learn from the California fires that 12 killed 85 people and destroyed thousands of buildings. 13 PG&E utility company seeks bankruptcy protection over 14 California fires. Governor Kate signed House Bill 2222 15 requiring annual report on wildfire protection efforts. 16 The bill was inspired in part by the wildfire last year 17 in Paradise, California. Frankly, I would hate to have 18 been on that board knowing that my transmission lines 19 caused that fire and all the damage it did to places in 20 California.</p> <p>21 I've enclosed an article on electric and 22 magnetic fields affecting milk production and behavior 23 of cows. If the transmission lines can cause that 24 effect on cows, then what is the long-term effect? Why 25 would we want to risk public health with the side</p>

Upon reviewing discrepancies in the 20,000 or so page EFSC Standards in Oregon Administration Rule I have found a serious flaw. Oregon Administrative Rule 345-025-0007 is missing. Upon further investigation, I discovered that this key set of OARs was redacted with white out. I failed to find an original version but I have a good idea why this was omitted. Unfortunately, I can't replicate the legalese of this administrative Rule nor do I speak the language but I can give you the gist.

OAR 345-025-0007 THE REAL ISSUES

(1) ETHICS

• (a) In 2007 B2H was announced. No vote was offered whether the people wanted it or not.

(b) Under Governor Tom McCall an energy corridor was established for high-voltage powerline routes. It was a low-impact route. When Idaho Power proposed B2H they either ignored or deemed this route too costly.

(c) Idaho Power is a for-profit corporation traded on the New York Stock Exchange.

i This brings up conflicts of interests. What is right for IPC's shareholders is not always in the best interest of the public. Idaho Power Corporation will turn a profit to satisfy shareholders at the expense of Baker County and Eastern Oregon. With sparse population Idaho Power rides roughshod through the county dictating how and where they choose to run the line.

Also ii a crooked playing field. Opponents are not given adequate or the same amount of time as Oregon Department of Energy or Idaho Power to review new documents or developments.

And iii skewered data, like averaging numbers to falsely state or bend IPC's position.

(d) The Interpretive Center opened in 1992 through a highly effective partnership of local, state, and federal government agencies, nonprofit organizations, and local residents. There was a gentlemen's understanding that nothing would be built in the view-shed of the Center, nor did anyone dream that the view would be degraded in such a manner. Nothing was signed but this was Baker and handshakes were valid and honored.

(e) Idaho Power is proposing to blatantly run their—up to--190'tall pylons in front of the BLM's Oregon Trail Interpretive Center. Where's the BLM's voice in all of this? Why are they allowing a corporation to build in front of the BLM Historical Center ruining the whole historical presentation of what this taxpayer's \$16 million National Showcase Interpretive Center represents?

Conclusion

(a) Idaho Power is a large powerful corporation bullying its way through a small rural community just because it can. Regard their contractual agreement to provide fish ladders on the dams they built on the Snake, but then reneged on their obligation once the dams were up and running. They cannot be trusted. There are no repercussions in place if they won't and don't follow up on their promises and again we, the local citizens have to live with the damages.

(b) Morals and decency have been thrown out the window. Money and greed are trying to replace them. If approved Idaho Power is guaranteed an \$80 million profit for itself and their partners' shareholders. What does Baker get?

(c) This process needs to ask bigger questions. B2H is being subject to a vetting system that can't and has never said no to other similar projects, a vetting system that is allowing this boondoggle to get its rubber stamp. This process needs a non-partial forum for fairness, a council made up of people not picked or reinstated by a governor who was backed by PacifiCorp, Idaho Power's silent partner in B2H.

- (d) While these hearings are supposed to bring out the flaws in the proposed plan they also help Idaho Power plug their leaking dike. These are problems Idaho Power should have already foreseen if they had planned better.
- (e) I have fought this B2H proposal since near the beginning. It was a bad idea and it's an even worse idea now.
- (f) All we, the public, would like in this process is impartiality and that we have not been given.

Thank you,

WHITE DESIGNER

ESTERSON Sarah * ODOE

From: Whit Deschner <deschnerwhit@yahoo.com>
Sent: Wednesday, August 21, 2019 8:13 AM
To: B2H DPOComments * ODOE
Subject: Comments on B2H DPO
Attachments: DPO comments re Interpretive Center.docx

Please see attached. Thank you, Whit Deschner

Aug. 17, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Boardman to Hemingway Transmission Project
Oregon Department of Energy
550 Capital St NE
Salem, OR 97301

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

Chair Beyeler and Members of the Council:

Background

I am a citizen and land and home owner in Baker County and I urge you to deny this site certificate to Idaho Power to build their Boardman to Hemingway high voltage power line. However, my protest letter is aimed towards this DPO's treatment of the Historic Oregon Trail Interpretive Center. Either Idaho Power is naïve of the issues involved here or, they are just showing their arrogance and think they can bowl a small town over. This community worked hard with the BLM to create this showpiece of the Oregon Trail. This is a National Treasure. It was built with a handshake understanding that Idaho Power would not desecrate the Center's view-scape of the trail. It is obvious that Idaho Power doesn't, or ever did, honor such agreements except when it is in their favor not to.

Scenic Aesthetic Values. Scenic Resources 1.0 Introduction

EFSC should not approve this Draft Project Order. Reasons:

"... (IPC) proposed mitigation measures near the National Historic Oregon Trail Interpretive Center—is not likely to result in significant adverse impacts to scenic resources and values identified as significant or important in local land use plans, tribal land management plans, and federal land management plans for any lands located within the analysis area described for the Project..."

Why is Idaho Power allowed to propose their mitigation so why can they pick and choose their own standards as to what 'significant adverse impacts' means? The DPO goes for pages (over 100) trying subjectively and unsuccessfully to describe what scenic values are and how they would apply to the Interpretive Center. Idaho Power produces this solution:

In preliminary analyses conducted for the Flagstaff Alternative, IPC concluded that potentially significant visual impacts from facility structures, as proposed, may result from that alignment due to its proximity to the NHOTIC. Consequently, IPC analyzed three mitigation options aimed at reducing adverse impact to less than significant: (1) applying a natina finish to the lattice structure; (2) using an H-frame structure with galvanized finish; or (3) using an H-frame structure with a natina finish. IPC incorporated Option 3 into its Project design. In the final indicative design, IPC relocated the Proposed Route to the east of the

Flagstaff Alternative outside of the active agriculture area but closer to the NHTOTC. To mitigate potential visual impacts, IPC incorporated prior mitigation and design work emphasizing the use of H-frames, but proposes using shorter stature H-frames structures ranging in height from 100 feet to 129 feet for towers located directly to the north and west of the NHTOTC. The proposed finish is weathered steel (or an equivalent coating).

page R-120

The fact is the pylons are still pylons yet with their special paint they are claiming they can't be seen. Is this the same paint they painted the fish ladders on the Oxbow, Brownlee and Hells Canyon dams? No mention is made of the wires being seen, what special paint these will these be painted so as not to be seen.

The DPO goes on:

...the applicant must demonstrate why the proposed facility is compliance with the Scenic Resources standard. Visual simulations or other visual representations are not required, but can provide important evidence for use by the Department and Council in understanding the potential visual impact of the proposed facility to Scenic Resources.

This, Idaho Power has failed to do. And although what is scenic is subjective, what is noise is not. There were no models made of powerline noise from the Oregon Interpretive Center's Trail. To be a tourist and hear powerlines would be quite disturbing. Why was a study not included in the DPO?

Protected Area

Again, here is OAR 345-022-0040, which is 479 words describing the significant adverse visual impacts along with the ACEC acronym which unfolded means: AREA OF CRITICAL ENVIRONMENTAL CONCERN and yet in a single unsubstantiated sentence: *IPC concluded visual impacts, considering this mitigation and design, would be less than significant.* Again IP is getting out their magic invisible paint.

3.6 Mitigation OAR 345-022-0040(1): Except as provided in sections (2) and (3), the Council shall not issue a site certificate for a proposed facility located in the areas listed below. To issue a site certificate for a proposed facility located outside the areas listed below, the Council must find that, taking into account mitigation, the design, construction and operation of the facility are not likely to result in significant adverse impacts to the areas listed below. References in this rule to protected areas designated under federal or state statutes or regulations are to the designations in effect as of May 11, 2007: IPC determined the Project, without mitigation, may cause significant adverse visual impacts to two protected area resources within the analysis area: the Oregon Trail ACEC – NHTOTC Parcel, and the Birch Creek ACEC. Based on this conclusion, IPC developed site specific measures to avoid, reduce, or otherwise mitigate these potentially significant impacts so that the Project can ultimately be constructed, operated, and maintained without a significant adverse impact. 3.6.1 Oregon Trail Area of Critical Environmental Concern – National Historic Oregon Trail Interpretive Center Parcel 3.6.1.1 History of Siting and Mitigation Considerations In evaluating various alternatives for project siting, IPC concluded that potentially significant visual impacts from facility structures located directly west of the NHTOTC (corresponding to the Flagstaff Alternative) could result. To address potential impacts, IPC analyzed three design options aimed at reducing adverse impacts to less than significant: (1) applying a natina finish to the lattice structure; (2) using an H-frame structure with galvanized finish; or, (3) using

an Hframe structure with a natina finish. These mitigation strategies were considered for six transmission tower structures located directly west and within 1,200 feet of the NHTOTC boundary. Because of the terrain backdrop, IPC selected the H-frame structure with the weathered steel surface treatment, as it was expected to reduce the visual contrast below that of the standard galvanized structures. The H-frame structure type was selected because these structure types can be designed with a lower overall height than either lattice towers or monopoles and can appear similar in character to the wood H-frame structures often used for transmission lines of 115 kV to 230 kV. H-frames also may appear to have a narrower profile, depending on the relationship of the viewer to the structure. The heights of the towers shown in the simulations prepared from KOP 25c were 145 feet for H-frame structures (as opposed to 195 feet for lattice structures). Considering this mitigation, preliminary conclusions regarding visual impacts to the Oregon Trail ACEC – NHTOTC Parcel, NHTOTC recreation site, and VRM Class II area assumed medium intensity impacts, resulting from both medium resource change and viewer perception. Medium intensity impacts were determined not to preclude the resource from providing the visual qualities that currently exist within the ACEC, or as influenced from the surrounding landscape. **IPC concluded visual impacts, considering this mitigation and design, would be less than significant.**

Recreation

Attachment T-3, Table T-3-1, the NHTOTC is an important opportunity because of its designation status, high level of use, outstanding quality, and irreplaceable character per OAR 345-021-0010(1)(t)(A).

The DPO doesn't even come close to appeasing the OAR.

Besides being a historical site, this BLM facility was made for tourist and it is managed as such. It is the most visited attraction in Baker County. It is part of our National Heritage and it is a natural treasure. What Idaho Power is proposing to do is to harm this piece of our history nor do they seem to care.

This DPO is very confusing, bases itself on many assumed facts and twisted semantics and it hardly provides adequate answers to the problems it creates.

Because of the discrepancies in the above exhibits the DPO should not be approved by EFSC.

Thank you,

Whit Deschner
1640 3rd St
Baker City, OR 97814

541 519 2736

deschnerwhit@yahoo.com

ESTERSON Sarah * ODOE

From: Whit Deschner <deschnerwhit@yahoo.com>
Sent: Thursday, August 22, 2019 2:31 PM
To: B2H DPOComments * ODOE
Subject: B2H DPO
Attachments: _DPO comments re Interpretive Center 2.docx

please see attached.

Aug. 17, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Sitting Analyst
Boardman to Hemingway Transmission Project
Oregon Department of Energy
550 Capital St NE
Salem, OR 97301

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

Chair Beyeler and Members of the Council:

I am a resident of Baker County I have fought this B2H now for 10 years. I realize there is a protocol to writing letters at this stage of the process, that substantiated facts are required to back up the holes we see in the DPO, however, consider this: Baker County carries the most miles of the power lines—71 miles of the 305 through Oregon and what do we get? *Absolutely nothing*. Not even a substation and, Idaho Power plans to run the project in plain sight through the view scape of the Historic Oregon Trail Interpretive Center. The people of Baker worked hard, coordinating with the federal government to create this facility and if Idaho Power is blatantly allowed to desecrate a civic/cultural/historical monument like this one and get away with mere lip-service mitigation, then what faith should we have in a democratic process such as this one? What Idaho Power is doing is just plain wrong. Please deny them this certification application.

Sincerely, Whit Deschner



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) Dwight Dill

Mailing Address (mandatory) PO Box 3363
LAGRANDE, OR 97850

Phone Number (optional) Email Address (optional) ddill1987@gmail.com

Today's Date: 6/20/2019

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 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.</p> <p>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>

<p style="text-align: right;">Page 62</p> <p>1 preparing for tonight, I pulled up some comments that I 2 had written earlier. And these comments, I won't 3 provide them tonight because I printed them out on some 4 other stuff I'd prefer not to share with you. But I've 5 already sent them to you. And these are dated 6 September 2010. I'm not going to read them, I'm just 7 going to use them as a cheat sheet for myself to page 8 through some of the topics that I want to cover.</p> <p>9 I'm going to focus on forests and the 10 grasslands and the wildlife and the fish. Just in terms 11 of background, I have a bachelor's degree from Cornell 12 University, where I studied forestry and arboriculture. 13 I have been a certified arborist in good standing for 14 the last 23 years. I have lived and worked in northeast 15 Oregon for almost 40 years, and during that time I have 16 studied extensively the forests and the grasslands of 17 this area.</p> <p>18 One of the most important aspects of our 19 ecosystems is the connectivity of a variety, a wide 20 variety of habitat we have here, forests and 21 non-forests. And connectivity is the way that plants 22 and animals can move across the landscape. As we 23 continue to see the effects of climate change, that 24 connectivity is going to be so much more important.</p> <p>25 Constructing a power line through the middle</p>	<p style="text-align: right;">Page 64</p> <p>1 forest, our shared public lands, will be clear-cut as a 2 part of this project and will be maintained in a 3 non-forest condition.</p> <p>4 Also, the Forest Service has waived their 5 requirements for protecting riparian areas, and they 6 waive their protections for large trees and older trees 7 with this project.</p> <p>8 I have looked at the new draft proposed order 9 for the project. I have not found a total on the 10 acreage of private land forests that will be clear-cut, 11 but I assume it's extensive also. These are really 12 important ecological damages that will result in this 13 project.</p> <p>14 Let's see, just to name a few wildlife 15 species, sage-grouse down in Baker County. In Union 16 County this line would cross some of the most important 17 and the most valuable elk habitat in the state of 18 Oregon, just south of La Grande here. And pronghorn 19 antelope and mule deer, they all need habitat, they all 20 need to be able to migrate, they all need connectivity 21 of habitat. And this line would severely damage all of 22 those functions.</p> <p>23 I did want to read one section that I wrote 24 8 years ago, 9 years ago. It says: "Rural Oregon tends 25 to have higher poverty rates, lower wages and higher</p>
<p style="text-align: right;">Page 63</p> <p>1 of these native forests and grasslands goes right 2 against the concept of connectivity because by the 3 nature of it you are disrupting it, you are creating a 4 barrier.</p> <p>5 It was mentioned earlier that in the forested 6 areas that the right-of-way would be 300 feet wide. And 7 in layman's terms what that means is there is going to 8 be a 300-foot wide clear-cut through all the forests 9 that this power line crosses. 300 feet is the length of 10 a football field. So if you stand at the zero yard line 11 and you are looking clear down to the other end of the 12 100-yard football field, that is going to be width of 13 the clear-cut through the forest.</p> <p>14 Personally I feel like clear-cuts are not a 15 good thing to begin with, but under a power line it's 16 always going to be a clear-cut, and it's going to be 17 maintained either by cutting down the trees and shrubs 18 that grow back in or spraying with herbicide. Herbicide 19 is a necessary tool, but it comes with a lot of 20 environmental damages, and creating a new magnet for 21 herbicide is really just a bad idea.</p> <p>22 I have reviewed the environmental impact 23 statement, and I objected, we objected to the national 24 forest decision on this project. And one of the reasons 25 we did is because several hundred acres of national</p>	<p style="text-align: right;">Page 65</p> <p>1 unemployment than the urban areas where the electricity 2 would be shipped. Environmental justice is not served 3 when these rural areas are saddled with the 4 environmental cost of a transmission line and more 5 affluent urban areas are the primary beneficiaries."</p> <p>6 That remains true, and that is just not right.</p> <p>7 So my time is almost up. In conclusion, I 8 would just -- I hope -- again, I want to thank you for 9 coming and listening, coming to the community where we 10 all live.</p> <p>11 I mentioned some of the challenges we face in 12 the community, but we are a strong community. So I urge 13 you to do the right thing and prevent this line from 14 being built.</p> <p>15 Thank you.</p> <p>16 HEARING OFFICER WEBSTER: Thank you.</p> <p>17 Following Ms. Metlen we will have Joe Horst, 18 and I think we will do one more after Mr. Horst. We'll 19 hear from Gail Carbiener, then we will take our break.</p> <p>20 MS. ANITA METLEN: Good evening. Thank you 21 for hearing me and allowing all my fellow community 22 members to make comments on this project. My name is 23 Anita Metlen. I live at 65208 Hull Lane, Imbler, Oregon 24 97841.</p> <p>25 I strongly agree with all the previous</p>

Dill

I would like to speak to my concern regarding the environmental/visual impact of the B2H towers as they are proposed to be sited on the southern edge of La Grande near Morgan Lake ~~and on Sams Hill~~. I have heard many individuals refer to Union County as a "hidden gem" in Oregon. We have an incredibly beautiful valley with scenic vistas of the mountains surrounding the valley. Many out of town visitors are drawn to Union County because of this scenic beauty. Placement of these towers will certainly have an impact on this part of our tourism.

I often take early morning walks and am in awe of the beauty that surrounds us, especially in my views to the southern end of the valley where I reside. I have always considered myself fortunate to live in such a spectacular area. I am extremely concerned as to the blight these towers will place upon our view shed. Currently, I look out and see a ridgeline topped with green trees that presents a spectacular view. This will forever be changed and irrevocably harmed by the placement of these towers. Please consider the aesthetic needs and economic interests of our beautiful valley and take the responsible action against the siting of these towers in our valley.

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

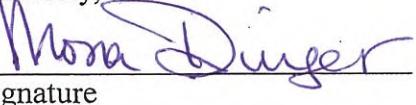
Idaho Power did not include any of the items listed in OAR 340-035-0035(I)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (I) 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:

Mona Dinger
1606 Oak St
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, 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,

Mona Dinger

Name: Mona Dinger
Address: 1606 Oak St.
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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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: Mona Dinger

Mailing Address: 1606 Oak St.
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) Brian Doherty

Mailing Address (mandatory) 70516 Hwy 207 Echo
Lexington, OR 97839

Phone Number (optional) (541) 989-8443 Email Address (optional) bpclohem@hughes.net

Today's Date: 6-27-19

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.)

Page 34

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

Page 35

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, fiber optic 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

Page 36

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

Page 35

Page 37

1 welding 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.

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,

Name
Address

*live in love don't ree
is made from fires.
Norton Drummom How about
PO BOX 143 what this world
COV OR 97824 do for
wildlife*

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 $\frac{1}{4}$ 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.

Gordon Drummond
Signature

Mailing Address
PO BOX 143
COOKE OR 97824

GORDON DRUMMOND
Printed Name
BORDMAN POWER PLANT
IS BLAST PLUTER ON
COLUMBIA

HOW ABOUT
ELK WINTER RANGE

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 $\frac{1}{2}$ 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 $\frac{1}{2}$ 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 $\frac{1}{2}$ 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)(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: Hannah Gerlach Duby

Mailing Address: 1612 Oak St. La Grande OR, 97850

12 August 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:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within $\frac{1}{2}$ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.


(Signature)

Name: Hannah Gerlach Duby

Address 1612 oak St. La Grande OR, 97850

ESTERSON Sarah * ODOE

From: Meg Duhr <megduhr@gmail.com>
Sent: Thursday, August 22, 2019 10:01 AM
To: B2H DPOComments * ODOE
Subject: B2H Comments
Attachments: M.Duhr comments on Idaho Power Boardman to Hemingway Transmission Project.docx

Hello,

Please find attached my letter with comments the B2H transmission line proposal.

Thank you for the opportunity to add my voice,
Meg

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301
B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council;

I appreciate the opportunity to comment on the Draft Proposed Order for Idaho Power's B2H project. I am writing this both as a noxious weed control professional and a resident of southeastern Washington who recreates in many locations along the proposed route of the high voltage lines. I also have several friends in the LaGrande area whose land will be directly impacted by this ill-advised, unnecessary, and illegal project. These people have been dedicated stewards of their land, some of them working for decades to protect and restore native plants and high quality rangelands on their property. All of this work would be severely damaged by this project.

I am also a citizen deeply concerned by the climate crisis. While on first glance, this project may appear to be a step in right direction towards carbon neutrality; it is not. Even if this power were needed in the Idaho market it claims to be needed in (which is deeply disingenuous, if not an outright lie from my understanding), this type of macro-grid energy development is not what we need. The costs of forest removal for hundreds of miles, the interruption in habitat corridors for wildlife and plants, and the end state: a vast area now permanently at elevated risk of wildfire and susceptible to new non-native plant invasions are not worth it. Whatever dubious emissions reductions created by long-distance transmission lines connecting Columbia River dams to Idaho consumers will be canceled out by this exceptionally poor land use.

Returning to the matter of invasive weeds, there are myriad inadequacies and failings with the proposed project. Though I am writing this letter on my personal time and from my personal computer, I would like you to understand that I work full time as an Integrated Pest Management Specialist for the US Fish and Wildlife Service in this area. I am *not* speaking on behalf of my agency, but I speak from a place of knowledge and experience. I have worked to control weeds in the Umatilla, Boardman, and Pendleton area and I am very familiar with the weed disasters and increased wildfire risks that ensue from any ground disturbance and removal of established vegetation. I am also intimately familiar with the weed species that are likely to colonize the disturbed ground in the project area. Once established, many of these species are exceptionally difficult to control and require many years of sustained effort. The proposal does not recognize this reality.

Preventing the spread of invasive weeds is the most effective step we can take in addressing the threat of invasive species. IPC's "Noxious Weed Plan" fails to take responsibility for spreading noxious weeds in several alarming ways. Here is an excerpt from their Plan (Monitoring 6.1):

As stated above, noxious weed monitoring and control will occur during the first 5-year period. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE

concurs, IPC will conclude that it has no further obligation to monitor and control noxious weeds in that area of the Project. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, or may request a waiver from further noxious weed obligations at these sites.

The landowner, or occupant of land in this case, is required by law to control weeds in perpetuity—not just for 5 years. To declare that IPC “has no further obligation” and can “request a waiver” is in blatant disregard of the law.

From Chapter 569 of Oregon law (https://www.oregonlegislature.gov/bills_laws/ors/ors569.html):

569.180 Noxious weeds as public nuisance; policy. *In recognition of the imminent and continuous threat to natural resources, watershed health, livestock, wildlife, land and agricultural products of this state, and in recognition of the widespread infestations and potential infestations of noxious weeds throughout this state, noxious weeds are declared to be a public nuisance and shall be detected, controlled and, where feasible, eradicated on all lands in this state. It is declared to be the policy of this state that priority shall be given first to the prevention of new infestations of noxious weeds and then to the control and, where feasible, eradication of noxious weeds in infested areas. [Formerly 452.615]*

569.390 Owner or occupant to eradicate weeds. *Each person, firm or corporation owning or occupying land within the district shall destroy or prevent the seeding on such land of any noxious weed within the meaning of ORS 569.360 to 569.495 in accordance with the declaration of the county court and by the use of the best means at hand and within a time declared reasonable and set by the court, except that no weed declared noxious shall be permitted to produce seed.*

IPC again disregards Oregon law by proposing to treat only Class “A” and “T” (a rotating list of weeds for focused treatments in a given year) weeds, ignoring the majority of problematic weed species. Class A weeds are "Early Detection/Rapid Response" species, those which have not yet been found in a given county or are currently occurring at very low densities. They are also sometimes called "watch list" species. Class A weeds are species which an entity (County or State) believes can be eradicated.

Naturally, the list of Class A species is small and constantly evolving. In my work, I rarely treat or even encounter Class A weeds, because they are so rare. Most of our energies are focused on Class B and C weeds, because these are actually the worst weeds, spreading most aggressively and causing the worst impacts to native plants, wildlife habitat, and private lands. Why should Idaho Power be exempt from responsibility for the full list of noxious weeds? The B2H project could become a conduit for the worst noxious weed species to get established in some of the best remaining native habitat in northeast Oregon.

In my research prior to writing this letter, I read “B2H Noxious Weed Plan Comments”, a document collated by weed supervisor Brian Clapp of Union County after a meeting of Morrow, Umatilla, and Union counties, Oregon Dept. of Ag, and the Tri-County Cooperative Weed Management Area on August 22, 2017. In this meeting of local weed management experts, they reviewed the B2H Attachment P1-5 Noxious Weed Plan. These comments reflected their concerns about the IPC plan, all of which I personally share. I was surprised and dismayed to recently learn that none of these were acknowledged in IPC’s later version, published over a year later.

Lastly, in indication that IPC has no understanding whatsoever of how noxious weeds function, the Plan states they are not responsible for “areas outside of the ROW”. The sites immediately outside areas of potential disturbance should be the highest priority, not an excluded after thought from their plans. Rapid spread and highly competitive traits are what makes noxious weeds noxious. Noxious weeds would explode in *and* near the ROW, ruining native habitat and compromising decades of work by landowners. IPC is proposing a huge area of disturbance; their responsibility should not be limited to the ROW.

I urge you to deny IPC's B2H Application for the reasons I have described above. IPC's "Noxious Weed Plan" does not comply with Oregon law. They deny responsibility for control of most weed species, deny responsibility for weed control after 5 years, control weeds only once a year, and give themselves a waiver when control fails. EFSC should reject the Weed Plan and Application.

Sincerely,

Meg H. Duhr

1122 West Elm Street
Walla Walla, WA
99362

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

B2H EFSC LACK OF DOCUMENTATION FOR GREAT GRAY OWL AND FLAMMULATED OWL

The surveys provided for these two species are too old to be a reliable indicator of the presence or impacts to these bird species. They were done in 2011 and 2012, seven years ago. On Page P1-9, Table P1-1 the applicant proposes doing updated surveys only on areas not previously surveyed and submitting them to only ODOE. This type of secretive procedure where the public is completely removed from any opportunity to comment or review the decisions being made by ODOE is the basis for a great deal of public dissatisfaction with the process currently being supported by ODOE and EFSC.

There is no current information in the application to base any decision regarding what the impacts will be to these birds as a result of the Boardman to Hemingway Transmission Line. A site certificate cannot be issued determining compliance with OAR 345-022-0060 without knowing what the use of the area is by wildlife. In addition, since habitat category must include the use of the habitat by species, the habitat categories cannot be determined until the developer provides the necessary current information. Given that the area of the Ladd Marsh Wildlife area is not only protected, but also contains both federal and state mitigation areas, it is not possible to determine whether or not the development will have unacceptable impacts to these mitigation sites absent information regarding the use of the adjacent habitat by wildlife utilizing the mitigation sites and whether or not the habitat will be compromised making it unsuitable for use of the species due to impacts of the development. Considering the lack of information near Ladd Marsh Wildlife area, one must question why.

Ladd Marsh is an important Migratory Bird Flyway according to the Oregon Department of Fish and Wildlife (ODFW 2008.) The Audubon Society lists it as an Important Bird Area. The number of bird species using this area has expanded in the last several years, however, in 2008 over 230 species of birds had been recorded on LMWA and over 120 species nest in the area and yet the developer appears to be ignoring the importance of not only the wildlife area, but also the habitat surrounding the wildlife area which is critical to the survival of birds moving in and out of the mitigation sites.



Signature/Name LYNN WHEELER DUNCAN

Address: 489 Modelaire Drive

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:

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

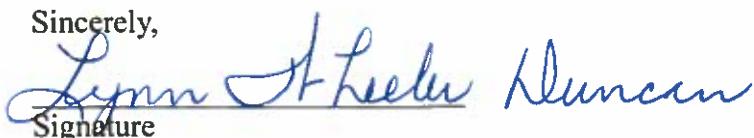
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources 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: LYNN WHEELER DUNCAN
Mailing Address: 489 Modelaire Drive
La Grande OR 97850

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 affects 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,

Lynn Wheeler Duncan
Signature

Printed Name:

LYNN WHEELER DUNCAN

Mailing Address:

489 Modelaire Drive, La Grande OR 97850

Email:

vlwd1910@gmail.com

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:

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,

Lynn Wheeler Duncan

Name: LYNN WHEELER DUNCAN

Address: 489 Modelaire Drive
La Grande, OR. 97850

(Jon)

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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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)(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: LYNN WHEELER DUNCAN

Mailing Address: 489 Modetaire Drive
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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I doubt it was extensive because it is entirely 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) 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 a 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

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 a 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: LYNN WHEELER DUNCAN

Address: 489 Modetaire Drive

La Grande OR 97850

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 1/4 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 $\frac{1}{4}$ 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.

Lynn Wheeler Duncan
Signature

LYNN WHEELER DUNCAN
Printed Name

Mailing Address: 489 Modelaire Drive
La Grande OR 97850

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

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,



Name LYNN WHEELER DUNCAN

Address

489 Modulaire Drive
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, its 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 $\frac{1}{2}$ 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 $\frac{1}{2}$ 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: LYNN WHEELER DUNCAN

Mailing Address: 489 Modelaire Drive
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,

Lynn Wheeler Duncan

Name: LYNN WHEELER DUNCAN

Address: 489 Modelaire Drive
La Grande OR 97850

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,

 Lynn Wheeler Duncan
Signature

Lynn Wheeler Duncan
Printed Name:

Mailing Address: 489 Modaire Drive, 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.

1112 1/2 Adams Ave
La Grande, OR 97850

RECEIVED
17 AUG 2019 PM
U.S. POSTAL SERVICE



Energy Facility Siting Counsel

Attn: V. Tardawatha

Oregon Dept. of Energy
550 Capitol St., NE

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Salem OR 97304-3742

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: *Hailey Durrant*
Mailing Address: *1307 M Ave*
La Grande OR

TARDAEWETHER Kellen * ODOE

From: Dutto <dutto@eoni.com>
Sent: Thursday, May 23, 2019 7:01 PM
To: B2H DPOComments * ODOE
Subject: B2H

April 19, 2019-This is being resubmitted on May 23, 2019 because I apparently wrote my comment too soon. More bureaucratic problems stifling public comment.

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

B@H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

As a citizen of La Grande and a City Councilor, I have grave concerns about the proposed placement of the Idaho Power Boardman to Hemingway Transmission Project. My concerns are for the safety of myself, my family and the citizens of La Grande if this line is erected. My primary concerns are twofold: 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).

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 ELECTRICAL OR POWER LINES.

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 electrical 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. This proposal should be REJECTED.

Sincerely,

Corrine Dutto
107 Penn Ave
La Grande, OR 97850
dutto@eoni.com

Exposure of human communities to wildfire in the Pacific Northwest

Joe H. Scott, Pyrologix

Julie Gilbertson-Day, Pyrologix

Richard D. Stratton, USDA Forest Service

Purpose and background

At the request of the United States Forest Service Pacific Northwest Regional Office, Pyrologix¹ assessed the exposure to wildfire of housing units within named human communities across the Pacific Northwest Region (Oregon and Washington). The purpose of the assessment was to identify the communities most threatened by wildfire. The fifty most-threatened communities in each state were identified.

These results have several applications. A home buyer can use these results for comparing the relative wildfire exposure of homes in different communities; homeowners can gauge their wildfire exposure compared to their peers in neighboring communities. Governments and other organizations can potentially use the results to prioritize communities for home-loss mitigation efforts, allocate mitigation funding, inform building codes, and guide residential development. Finally, land owners and land management agencies can use the exposure-source results to identify locations within their ownerships that produce damaging wildfires.

What is exposure to wildfire?

In the broadest sense, wildfire exposure encompasses the likelihood of wildfire burning a given location on the landscape, and the potential intensity of a wildfire if one were to occur. For this assessment we focus only on wildfire likelihood because the effect of fire intensity on home loss rate is not well studied, and because the inclusion of intensity for this and similar assessments did not influence the conclusions. Wildfire likelihood is measured by annual burn probability, a measure generated by comprehensive simulation of wildfire occurrence and spread (see section below on Wildfire hazard simulations).

What is a human community?

We defined a human community as the population (housing units) within a community core as defined by the Populated Place Areas dataset produced by the United States Census Bureau plus the population within a 45-minute drive of the boundary of the community core².

Housing unit data

The West Wide Wildfire Risk Assessment (Sanborn Map Company 2013) produced a spatial dataset called Where People Live (WPL). The WPL layer, which was generated by processing LANDSCAN and U.S. Census data, represents the estimated density of housing units across the 17 western states. We converted those housing-unit density values to housing-unit counts. Summing the housing-unit count

¹ Pyrologix is a Montana-based wildfire threat assessment research firm (www.pyrologix.com).

² The drive-time analysis was conceived and conducted by Dr. Alan Ager and his staff at the Rocky Mountain Research Station, USDA Forest Service.

values for all locations in a named community provides an estimate of the total number of housing units in the community.

For this assessment, housing units were considered *directly* exposed to wildfire if they were located on burnable land cover³. Housing units were considered *indirectly* exposed to wildfire if they were located on nonburnable land cover (other than open water) but within 150 m of burnable land cover. Only directly or indirectly exposed housing units are summarized in this report. Nonexposed housing units (those within an urban core, for example) are not included.

Wildfire hazard simulations

This assessment relies on wildfire behavior simulations produced using a comprehensive wildfire occurrence, growth and behavior simulation system called FSim (Finney and others 2011). The FSim modeling for Oregon was conducted for the Pacific Northwest Region Quantitative Wildfire Risk Assessment (QWRA), which was completed in 2018 (Gilbertson-Day and others 2018). The FSim model works by simulating 10,000 or more “iterations” to produce spatial data representing annual burn probability—the annual likelihood that a wildfire will reach a given point on the landscape. Each iteration is a possible realization of a complete calendar year. The FSim burn probability results show considerable variation in wildfire likelihood across the states (Figure 1).

In addition, FSim records the start location and final perimeter for each of its simulated wildfires, enabling us to attribute housing-unit exposure to the origin location, which we use in an assessment of the source of exposure of housing units to wildfire.

Housing-unit exposure to wildfire

Mean burn probability

We calculated the mean burn probability where the housing units are located within each community. This measure represents the mean likelihood that a housing unit in a community will experience a wildfire in one year. The higher this value, the more likely it is that an individual housing unit will experience a wildfire. Mean burn probability is not a cumulative measure for a community, so it does not necessarily increase as the number of housing units increases. Instead, this measure is sensitive to the general location of a community within the burn probability map (Figure 1) and the specific locations of housing units with each community.

Community-wide housing-unit exposure

We first generated raster data representing the expected annual number of housing units exposed to wildfire (the product of housing-unit count and burn probability). We then summed those results within each community; a community with more housing units can therefore have a greater community-wide exposure. The resulting sum represents the estimated mean annual number of housing units expected to experience a wildfire. The top 50 Washington communities by this measure are listed in Table 1; the top 50 Oregon communities are listed in Table 2.

³Burnable and nonburnable land cover is characterized by the LANDFIRE 2014 FBFM40 data layer (www.landfire.org), with minor calibration edits informed by local expert knowledge. Burnable land cover includes land covered by grasses, forbs, shrubs, tree litter, understory trees, or logging slash. Nonburnable land cover includes urban areas, irrigated agricultural land, permanent snow or ice, bare ground, and open water.

A community can be ranked as highly exposed due a combination of high likelihood or high population. To illustrate those contributing factors, we plotted mean burn probability against total housing unit count for the 50 communities with the greatest cumulative exposure (Figure 2 and Figure 3). Both axes are plotted on a common-log scale. The plot is divided into a 4-by-3 grid, which is convenient for interpreting the results with the communities plotted in the lower right-hand corner having the greatest likelihood of burning, but relatively few exposed housing units, while communities in the top left square have the greatest number of housing units and relatively low burn probability. The communities plotted in the middle, far-right squares have some of the highest burn probabilities and a moderate number of housing units exposed. These communities could be further evaluated for wildfire mitigation opportunities to reduce exposure near the homes.

Landscape-wide sources of housing-unit exposure

We assessed the relative potential for different parts of the landscape to produce wildfires that expose housing units. That damage potential is a function of spatial variation in fire occurrence and fire growth potential (which is simulated by FSim), in conjunction with spatial variation in housing-unit count. To do this we summed the number of housing units within each simulated fire perimeter, then attributed the start location of each fire with that number. We then created a smoothed surface that represents the relative annual number of housing units exposed by fires originating across the landscape (Figure 4). Even though a small number of large fires account for the vast majority of wildfire area burned (Strauss and others 1989) it appears that wildfires originating near populated areas are responsible for the vast majority of the housing-unit exposure. The areas of higher exposure-source tend to fall near where communities exist.

Discussion

Spatial inequality in housing-unit exposure to wildfire

We show results for the 50 most-exposed communities in both Washington and Oregon, but we assessed exposure to all 1,005 named communities across the two states. In Washington, the 50 communities most exposed to wildfire comprise only 12% of the 2,196,244 housing units located on or near burnable land cover in the state. However, those same communities represent roughly 70% of the cumulative housing-unit exposure. In Oregon, the 50 most-exposed communities comprise only 19% of the 1,196,187 housing units located on or near burnable land cover, but 80% of the cumulative housing-unit exposure. Across both states combined, the 100 most-exposed communities comprise 15% of the housing units located on burnable land cover but 76% of the cumulative housing-unit exposure.

These results illustrate an unequal distribution of wildfire exposure among human communities—most of the wildfire exposure occurs in a relatively small number of communities. The unequal distribution suggests that focusing mitigation efforts on the most-exposed communities is likely to result in the greatest benefit.

Ownership at source locations of housing-unit exposure

In contrast with other “risk transmission” analyses, we did not focus on the effects of fires originating on any particular land ownership (e.g., USFS land) on housing-unit exposure. Instead, we identified locations with greater potential for reaching housing units using a purely spatial approach. When USFS land ownership is overlaid on this map, it is evident that USFS land is not the dominant contributor to overall housing-unit exposure in the Pacific Northwest. Fires with potential to affect housing units tend

to start near housing units, and the land surrounding housing units is generally not in USFS ownership. Exceptions exist, however. Fires originating on some portions of USFS land ownership, especially east of the Cascade Mountains in Washington, can indeed reach significant numbers of housing units.

More information

The full list of communities in Washington and Oregon and their exposure to wildfire is available [here](#) as a Microsoft Excel workbook.

Additional detailed spatial information about wildfire hazard and risk to homes in Oregon can be found at the [Oregon Wildfire Risk Explorer](#).

References

Gilbertson-Day, Julie; Scott, Joe; Vogler, Kevin; Brough, April. 2018. Pacific Northwest Quantitative Wildfire Risk Assessment: Methods and Results. Final report. Available:
http://pyrologix.com/ftp/Public/Reports/PNRA_QuantitativeWildfireRiskReport_08_27_18.pdf

Sanborn Map Company. 2013. West wide wildfire risk assessment: FINAL REPORT. Available:
http://www.odf.state.or.us/gis/data/Fire/West_Wide_Assessment/WWA_FinalReport.pdf

Strauss, David; Bednar, Larry; Mees, Romain. 1989. Do one percent of forest fires cause ninety-nine percent of the damage? Forest Science 35(2): 319–328.

Suggested citation

Scott, Joe H.; Gilbertson-Day, Julie; Stratton, Richard D. 2018. Exposure of human communities to wildfire in the Pacific Northwest. Briefing paper. 10 p. Available at:
http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf

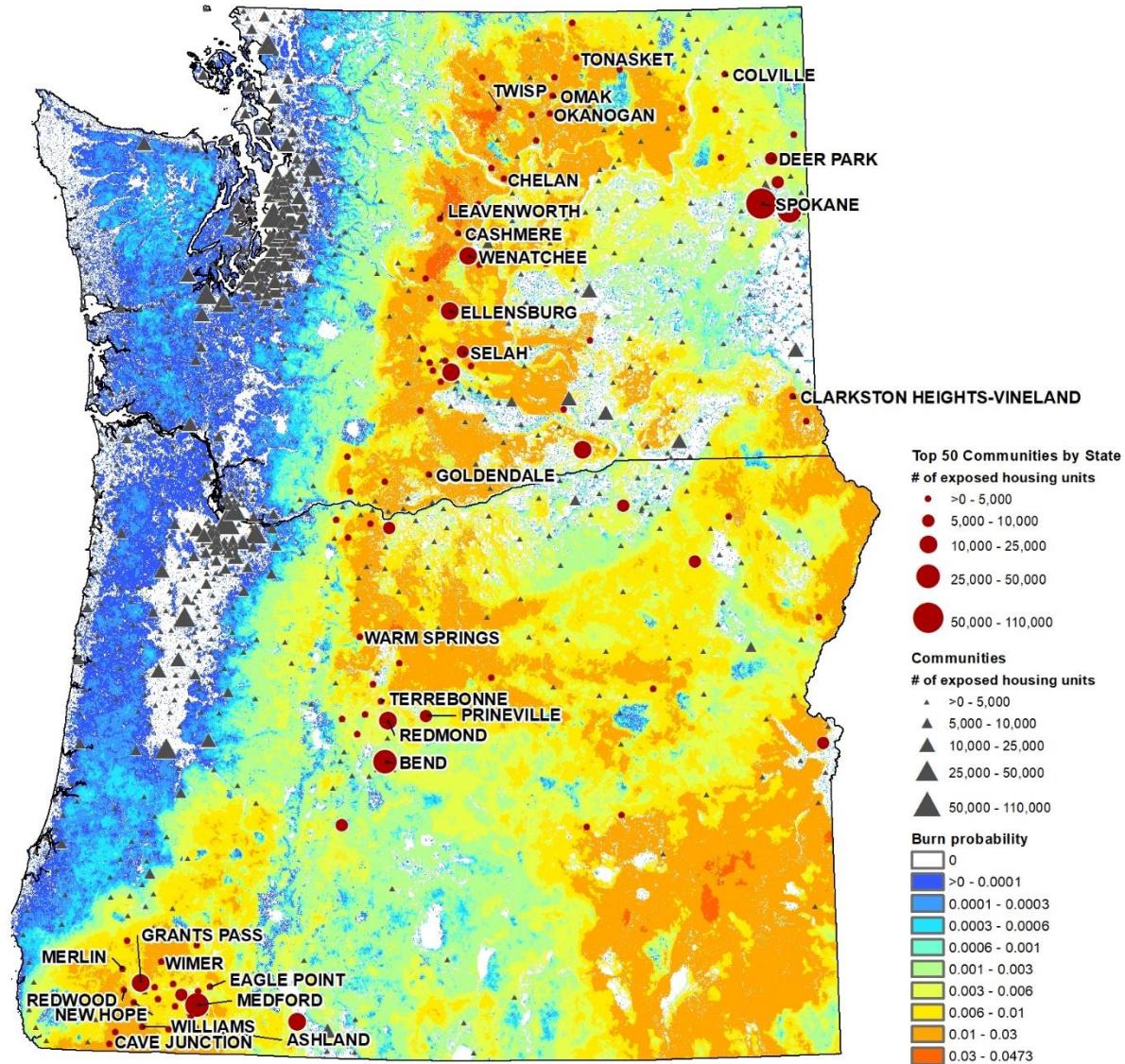


Figure 1. Annual burn probability across the states of Washington and Oregon and exposed human communities in each state. The 50 most-exposed communities in each state are mapped in dark red. The most-exposed communities tend to be in areas with the highest annual burn probabilities based on the FSim modeling results.

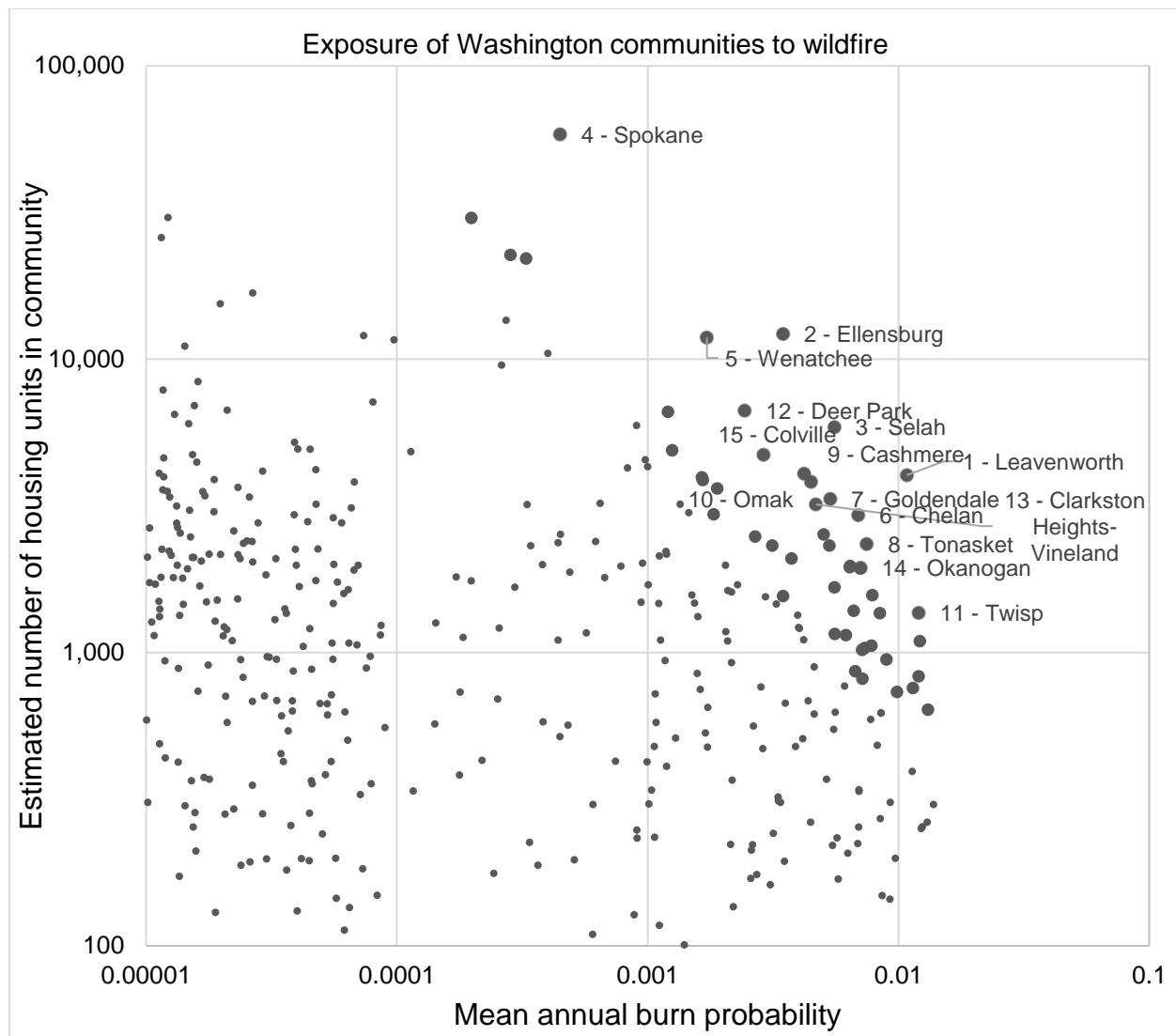


Figure 2. Exposure of Washington communities to wildfire. The 50 most-exposed communities (by cumulative annual housing-unit exposure) are shown as larger gray dots. The top 15 are labeled with the rank and community name. See Table 1 for the names of the remaining top-50 communities. Smaller gray dots represent communities not among the 50 most exposed. Only the 382 communities with a mean burn probability greater than 0.0001 (1 in 10,000) are shown; 245 communities with a lower mean burn probability are not shown. Axes are shown on a common-log scale (base 10).

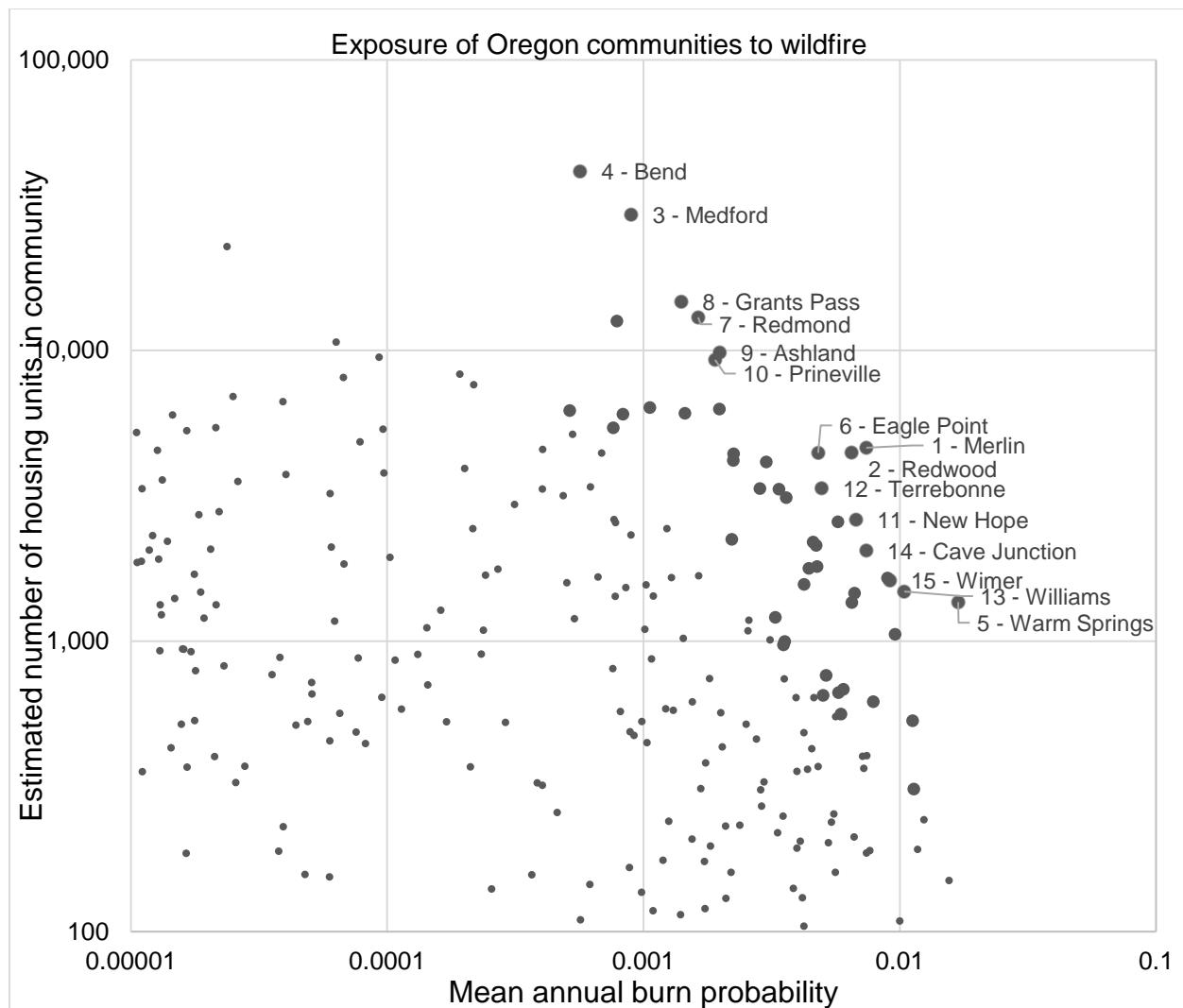


Figure 3. Exposure of Oregon communities to wildfire. The 50 most-exposed communities (by cumulative annual housing-unit exposure) are shown as larger gray dots. The top 15 are labeled with the rank and community name. See Table 2 for the names of the remaining top-50 communities. Smaller gray dots represent communities not among the 50 most exposed. Only the 244 communities with a mean burn probability greater than 0.0001 (1 in 10,000) are shown; 133 communities with a lower mean burn probability are not shown. Axes are shown on a common-log scale (base 10).

Table 1. The 50 communities in Washington with greatest cumulative housing-unit exposure to wildfire. The “mean of exposed housing units” rank indicates the mean (typical) burn probability of housing units within each community.

Community Exposure Ranking	Community Name	Total number of housing units exposed to wildfire	Estimated mean annual number of housing units visited by wildfire	Mean annual burn probability	Burn probability rank
1	Leavenworth	4,025	43.5	0.0108	11
2	Ellensburg	12,204	42.3	0.0035	76
3	Selah	5,873	32.6	0.0056	52
4	Spokane	58,409	26.2	0.0004	165
5	Wenatchee	11,864	20.4	0.0017	112
6	Chelan	2,938	20.3	0.0069	37
7	Goldendale	3,341	17.9	0.0053	55
8	Tonasket	2,343	17.5	0.0075	28
9	Cashmere	3,822	17.1	0.0045	62
10	Omak	4,065	17.1	0.0042	65
11	Twisp	1,364	16.4	0.0121	7
12	Deer Park	6,684	16.3	0.0024	96
13	Clarkston Heights-Vineland	3,198	15.0	0.0047	59
14	Okanogan	1,947	13.8	0.0071	32
15	Colville	4,720	13.7	0.0029	87
16	Cle Elum	1,936	13.7	0.0071	33
17	Winthrop	1,095	13.3	0.0122	6
18	Sunnyslope	2,528	12.7	0.0050	58
19	Brewster	1,973	12.6	0.0064	41
20	Kittitas	1,952	12.5	0.0064	42
21	Entiat	1,570	12.3	0.0079	25
22	Ahtanum	2,318	12.3	0.0053	56
23	Summitview	1,361	11.5	0.0084	23
24	Malott	830	10.0	0.0120	8
25	Manson	1,670	9.3	0.0056	51
26	Springdale	1,388	9.2	0.0066	40
27	Thorp	757	8.6	0.0114	9
28	Asotin	947	8.5	0.0089	18
29	Riverside	638	8.4	0.0131	2
30	Republic	1,057	8.3	0.0078	26
31	Mead	6,614	8.0	0.0012	126
32	South Wenatchee	2,090	7.8	0.0037	73
33	White Swan	1,035	7.6	0.0073	29
34	Inchelium	1,022	7.3	0.0072	31
35	Oroville	2,317	7.3	0.0031	84
36	Klickitat	734	7.2	0.0099	13
37	Yakima	22,047	7.2	0.0003	176
38	Naches	1,147	7.1	0.0062	44
39	Ephrata	3,623	6.9	0.0019	108
40	White Salmon	2,487	6.7	0.0027	91
41	Othello	3,961	6.5	0.0016	115
42	Addy	1,157	6.5	0.0056	50
43	Kennewick	22,660	6.4	0.0003	178
44	Newport	3,871	6.4	0.0017	114
45	West Richland	4,889	6.1	0.0013	125
46	Spokane Valley	30,340	6.0	0.0002	186
47	Trout Lake	814	5.9	0.0072	30
48	Cowiche	864	5.8	0.0067	39
49	Terrace Heights	2,960	5.4	0.0018	109
50	Gleed	1,557	5.4	0.0035	77

Table 2. The 50 communities in Oregon with greatest cumulative housing-unit exposure to wildfire. The “mean of exposed housing units” rank indicates the mean (typical) burn probability of housing units within each community.

Community Exposure Ranking	Community Name	Total number of housing units exposed to wildfire	Estimated mean annual number of housing units visited by wildfire	Mean annual burn probability	Burn probability rank
1	Merlin	4,628	34.2	0.0074	21
2	Redwood	4,451	28.9	0.0065	29
3	Medford	29,340	26.3	0.0009	128
4	Bend	41,321	23.4	0.0006	145
5	Warm Springs	1,362	23.0	0.0169	1
6	Eagle Point	4,443	21.3	0.0048	45
7	Redmond	13,005	21.3	0.0016	103
8	Grants Pass	14,718	20.6	0.0014	108
9	Ashland	9,853	19.5	0.0020	90
10	Prineville	9,285	17.7	0.0019	92
11	New Hope	2,616	17.7	0.0067	25
12	Terrebonne	3,353	16.6	0.0050	43
13	Williams	1,481	15.4	0.0104	9
14	Cave Junction	2,049	15.2	0.0074	20
15	Wimer	1,617	14.8	0.0091	13
16	Gold Hill	2,576	14.8	0.0057	35
17	Chenoweth	1,650	14.8	0.0090	15
18	Talent	4,138	12.5	0.0030	71
19	Central Point	6,282	12.4	0.0020	91
20	Sisters	3,336	11.3	0.0034	67
21	Tumalo	3,119	11.2	0.0036	62
22	Selma	1,055	10.1	0.0096	12
23	Jacksonville	2,132	10.1	0.0047	47
24	Rogue River	2,189	10.1	0.0046	49
25	Klamath Falls	12,620	9.9	0.0008	134
26	Madras	4,408	9.9	0.0022	82
27	Ruch	1,463	9.7	0.0067	26
28	Phoenix	3,346	9.5	0.0028	75
29	White City	4,186	9.4	0.0022	83
30	Ontario	6,086	8.8	0.0015	106
31	Glendale	1,356	8.8	0.0065	28
32	Shady Cove	1,804	8.6	0.0048	46
33	Burns	1,778	7.9	0.0044	51
34	La Pine	6,357	6.7	0.0011	120
35	Eagle Crest	1,565	6.6	0.0042	53
36	Takilma	532	6.0	0.0112	8
37	The Dalles	6,032	5.0	0.0008	132
38	Odell	2,239	5.0	0.0022	84
39	Halfway	619	4.9	0.0079	16
40	La Grande	5,426	4.1	0.0008	138
41	Foots Creek	683	4.1	0.0060	31
42	Culver	1,207	3.9	0.0033	69
43	Trail	763	3.9	0.0052	41
44	Mount Hood	664	3.8	0.0058	34
45	Elgin	997	3.5	0.0036	63
46	Mitchell	310	3.5	0.0114	7
47	Hines	970	3.4	0.0035	65
48	Butte Falls	560	3.3	0.0059	33
49	Prairie City	650	3.3	0.0050	21
50	Pendleton	6,215	3.2	0.0005	29

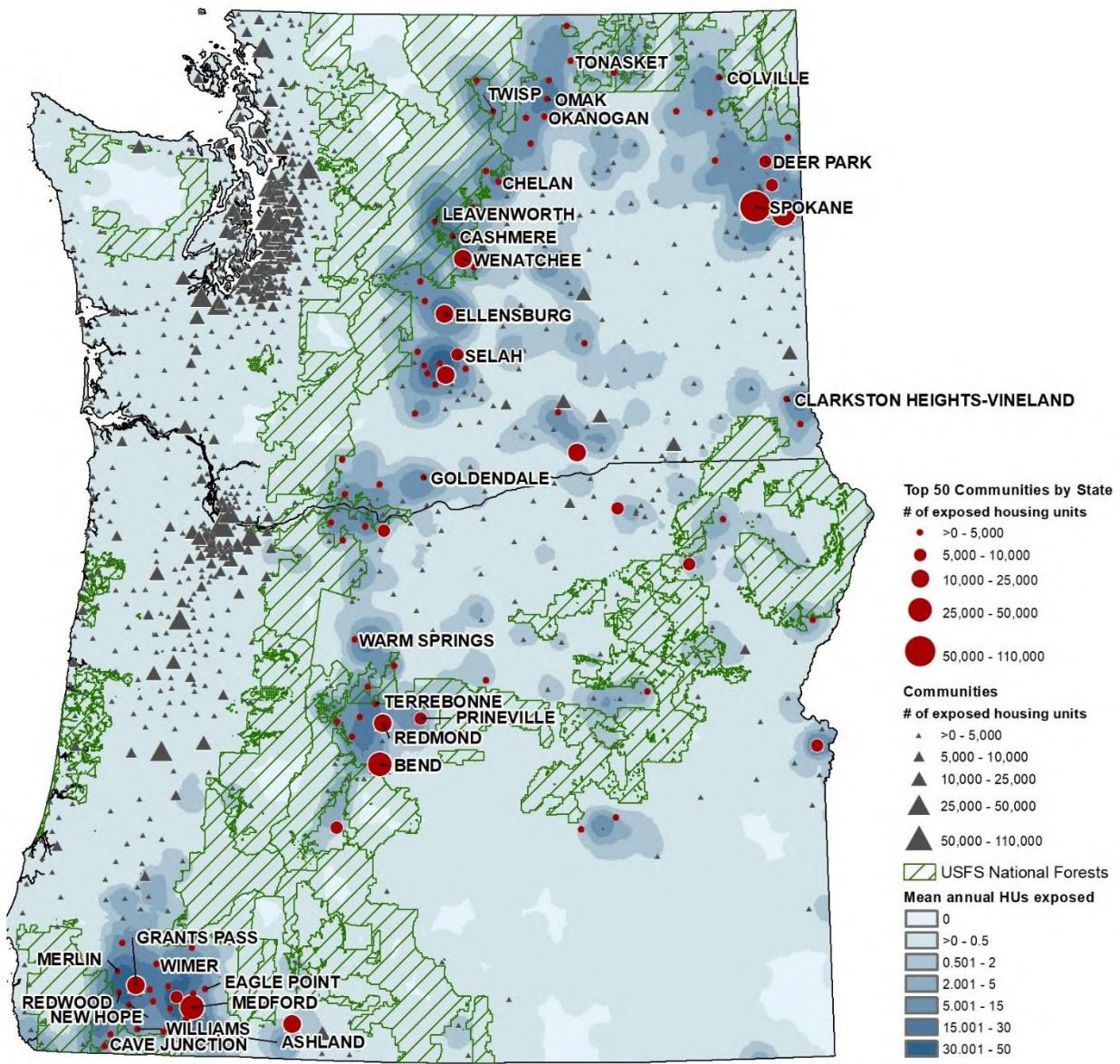


Figure 4. Sources of housing-unit exposure to wildfire across Washington and Oregon and exposed communities across the two states. The fifty most exposed communities in each state are shown in dark red, the remaining communities in gray. Dark blue areas of the map tend to produce greater annual housing-unit exposure.

ESTERSON Sarah * ODOE

From: Nicki Ebel <nebel@mountainvalleytherapy.biz>
Sent: Wednesday, August 21, 2019 9:24 PM
To: B2H DPOComments * ODOE
Subject: Objection to the Proposed B2H Transmission Line Project

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

Sent 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.

RE: Anadromous Fish in Ladd Creek, Union County

Dear Chair Beyeler and Members of the Energy Facility Siting Council:

I am writing in protest of the proposed Boardman to Hemingway Transmission Line Project. I have many concerns regarding this Transmission Line traveling through the Grande Ronde Valley but specifically, I am protesting regarding the B2H Draft Proposed Order, the Final Environmental Impact Statement, and the project's plan regarding wild and threatened fish.

Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue Mountains, into the Ladd Marsh Wildlife area, connecting with Catherine Creek and the Grande Ronde, Snake, and Columbia Rivers.

Historically, there were anadromous fish (steelhead and salmon returning from the ocean) in Ladd Creek. ODFW has documented that steelhead and salmon used Ladd Creek for spawning. However, construction of Interstate 84 in the 1970's stopped the passage of these fish above the interstate due to a vertical culvert being installed (see Power Point "Ladd Creek Fish Passage Project - ODOT FTP").

The Oregon Department of Fish and Wildlife's Mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state Wildlife Policy (ORS 496.012) and Food Fish Management Policy (ORS 506.109) are the primary statutes that govern management of fish and wildlife resources.

The B2H Draft Proposed Order (page 9-10 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*), states that Ladd Creek and its tributaries contain only local fish (trout), but **that status has**

changed due to major culvert work along and under the I-84 interstate in the last 4 years. As a result, the information contained in the B2H Draft Proposed Order is incorrect and out of compliance with Oregon and Federal statutes.

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see <https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151>).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see <https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648>). Construction has resulted in costs over 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service (see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and ([PPT] Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species (ESA). The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

The B2H Draft Proposed Order contains the following outdated information:

1. In *Table 1. Road-Stream Crossing Ownership, Risk Summaries, Proposed Crossing Types, and Fish Passage Information* Idaho Power names 5 waters in the Ladd Creek area (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*) with stream crossings. The report states that the only fish in these waters are resident fish. This information is now incorrect.
2. The B2H Draft Proposed Order states that for all of Ladd Creek and its tributary streams that “No new ODFW fish plan anticipated.” (page 9-11 of Attachment BB-2). It cannot be overemphasized that this information is now incorrect.
3. The alternative route Idaho Power has chosen will necessitate a 3a/3b (page 11 BB-2) design change for a bridge crossing on Ladd Creek if this route is chosen, this will trigger an ODFW fish passage plan to be implemented (*OAR 17 412-0035*) based on *Oregon Administrative Rules (OAR) 635-412-0020*. Again, the B2H Draft Proposed Order information is now incorrect.

Because of the change of status of the fish population in Ladd Creek, the B2H Draft Proposed Order is out of compliance with several Federal and State laws including:

1. *ORS 509.580 through 509.910: Fish Passage; Fishways; Screening Devices; Hatcheries Near Dams*

2. OAR 635-41-0005 through 635-412-0040: *Fish Passage*
3. *Oregon Forest Practice Administrative Rules and Forest Practices Act, OAR Chapter 629 (ODF 2014)*
4. *Forest Practices Technical Note Number 4, Fish Passage Guidelines for New and Replacement Structures (ODF 2002)*
5. *Fish and Wildlife Mitigation Policy (OAR 635-415-0000), which states that :*
 - a. The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality.
 - (b) The Department shall act to achieve the mitigation goal for Category 2 habitat by recommending or requiring:
 - (A) Avoidance of impacts through alternatives to the proposed development action; or
 - (B) Mitigation of impacts, if unavoidable, through reliable in-kind, in-proximity habitat mitigation to achieve no net loss of either pre-development habitat quantity or quality. In addition, a net benefit of habitat quantity or quality must be provided. Progress towards achieving the mitigation goals and standards shall be reported on a schedule agreed to in the mitigation plan performance measures. The fish and wildlife mitigation measures shall be implemented and completed either prior to or concurrent with the development action.
 - (c) If neither 635-415-0025(2)(b)(A) or (B) can be achieved, the Department shall recommend against or shall not authorize the proposed development action.

In conclusion, aside from many other concerns regarding the environmental impact, the B2H Draft Proposed Order contains an improper evaluation of the potential short and long term negative impacts to the fish habitat in the Ladd Creek drainage, including surrounding creeks, given the fact that species listed as threatened under the Endangered Species Act are now returning to Ladd Creek, with their numbers expected to increase in upcoming months and years.

Sincerely,

Nicki Ebel
2510 East M Ave
La Grande, Or
97850
nebel@mountainvalleytherapy.biz

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

Dear Chair Beyeler and Members of the Council:

I respectfully request that this letter protesting issuance of a Site Certificate for the proposed Boardman to Hemingway Transmission Project be entered on the record.

Specifically, the applicant has failed to acknowledge the presence of a Federal and State-listed, Threatened species, and has failed to identify Category-1, Critical Habitat.

The Draft Proposed Order (DPO), p. 304, lines 20-26, fails to list Bull Trout, a listed State-Sensitive Threatened Species, also listed as Threatened by USFWS. OAR-345-021-0010 (1)(p) requires identification of all fish and wildlife at the proposed location, and identification of habitat classification categories, as set forth in OAR-635-415-0025, in order to comply with OAR-345-022-0060, requiring identification of habitat categories and required mitigation. The applicant has failed to comply with these requirements!

The Grande Ronde river watershed contains a well-documented population of Bull Trout. By statute, wherever a portion of a watershed contains a Threatened or Endangered species, the entire watershed is under federal protection. The Grande Ronde river watershed encompasses the entirety of Union county, and the majority of Wallowa county. As evaluated in the DPO, ASC Exhibit P, suitable habitat used by state-listed Threatened and Endangered species is designated pursuant to ODFW's Habitat Mitigation Policy, and EFSC's Fish and Wildlife Habitat standards, as Category-1 Habitat, where any impact, direct or indirect is prohibited. There is NO mitigation for Category-1 Habitat!

The DPO, p. 304, line 32, through p. 307, line 21, acknowledges that there will be impact, but is unable to quantify it. Since any impact is prohibited, the magnitude of impact becomes irrelevant.

The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080, as noted above.

In view of the fact that sufficient recovery of the Bull Trout population to remove its Threatened status is reliably estimated to be a matter of decades, issuance of a **Site Certificate should be denied, with prejudice!**

Sincerely,

Printed Name: Molly Eekhoff
Address: PO Box 2961, 802 O Ave., La Grande, OR 97850

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

August 21, 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: Molly Eekhoff

Address: PO Box 2961, La Grande, OR 97850

August 21, 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: Molly Eekhoff

Mailing address: PO Box 2961
La Grande, OR 97850

August 21, 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: Molly Eekhoff

Mailing Address: PO Box 2961
La Grande, OR 97850

August 21, 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:

1. Idaho Power failed to provide noise estimates for the lay down areas and incorrectly determined they were not required to do so.
2. Idaho Power failed to include all sources of noise as required by OAR 340-035-0035 in noise modeling done on all sites which were not previously used.

References:

OAR 340-035-0035

The exception to requiring noise impacts from sources listed in subsections (5)(b) - (f), (j), and (k) does not apply to developments on sites not previously used. When a lay down area, or other development is located on a site not previously used, the rule states "Sources exempt from the requirements of section (ii) 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 must provide noise monitoring results for all lay down areas or other areas where these types of noise will occur in areas not previously used.

Site Condition needed:

The applicant will complete noise modeling which includes the noise sources identified in OAR 340-035-0035 for all areas where development will occur on sites not previously used. The uses are contained in OAR 345-035-0035(5)(b) - (f), (j), and (k).

For any site exceeding the noise standards, the developer will obtain a waiver from the property owner prior to the start of construction, or establish through all available means of mitigation that the location will not exceed the noise standard.

When applying another agency's rules, the Oregon Department of Energy and Energy Facility Siting Council do not have the authority to make unique interpretations of common terms like "infrequent". The Oregon DEQ as the agency responsible for the rules must

provide any interpretation if indeed one is needed beyond the dictionary and common use of the term.

Noise surveys have not been completed, and it has not been established that the project will be able to meet the requirements of the standard, therefore, the site certificate must be denied.

Sincerely,

Signature

Printed Name: Molly Eekhoff

Mailing address: PO Box 2961

La Grande, OR 97850

August 21, 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

B2H.DPOComments@Oregon.gov

Dear Chair Beyeler and Members of the Council:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

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...” Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it’s possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is “property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500’ west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant’s ASC should be denied until all required and adequate noise modeling has been performed.

(Signature)

Name: Molly Eekhoff

Address: PO Box 2961, La Grande, OR 97850

August 21, 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

Email: B2H.DPOComments@Oregon.gov

Dear Chair Beyeler and Members of the Council:

Morgan Lake Park, analyzed as part of the Morgan Lake Alternative - (Attachment T-3, Table T-2, p. T-3-2; Table T-3-1, p. T-13) and Summary of Impacts, pp. T-27-28, 43, (T-4-51-56), inaccurately describes features of the park itself and severely underestimates the permanent impact of development on this unique city park.

See OAR 345-021-0010 (1) (T) (A) (B) & OAR 345-022-0100

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)

Page 62 (T-57) refers to “extensive work in the siting study of the Morgan Lake Alternative.” That is doubtful 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. In their application, Idaho Power 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 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.

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, might ever intrude]...”

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 of “no significant impact.”

Signature

Name: Molly Eekhoff

Mailing Address: PO Box 2961, La Grande, OR 97850

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 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,

Name: Molly Eekhoff

Address: PO Box 2961
La Grande, OR. 97850

August 21, 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 recreate 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

Molly Eekhoff
Printed Name:

Mailing Address: PO Box 2961, 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 21, 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 $\frac{1}{4}$ 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 $\frac{1}{4}$ 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

Molly Eekhoff

Printed Name

Mailing Address: PO Box 2961
La Grande, OR 97850

August 21, 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 $\frac{1}{4}$ 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 $\frac{1}{4}$ 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

Molly Eekhoff

Printed Name

Mailing Address: PO Box 2961
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

From: Ginny Elder <ginnylelder@ymail.com>
Sent: Tuesday, August 20, 2019 10:12 AM
To: B2H DPOComments * ODOE
Subject: Letter attached
Attachments: B2H letter.pdf

Attached is a letter regarding the B2H project. Thank you!

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:

Peter C. Elder
70029 Hidden Valley Lane
Cove, OR 97824

ESTERSON Sarah * ODOE

From: Ginny Elder <ginnyelder@ymail.com>
Sent: Wednesday, August 21, 2019 6:57 PM
To: B2H DPOComments * ODOE
Subject: Letters
Attachments: B2H1.pdf; B2H2.pdf

Attached is a letter regarding proposed B2H line.

Thank you.

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:

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,

Dinger Elder

Name: Dinger Elder, Virginia

Address: 20029 Hidden Valley Ln
La Grande, OR 97850
Cave OR 97824

Mailing Address:

City,

State, or
Country

70024 Hadden Valley Lane

Printed Name

Virginia Elder

Signature

Virginia Elder

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

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.

In summary:

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.

Removal of 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 predation on the multiple non-rapto 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.

The transmission line will impact root infrastructure once the transmission corridor is cleared. Weather conditions impacting weakened root infrastructure due to tree loss along the corridor is cleared. Forested lands that avoid having log trucks and equipment moving below the transmission line, it will decrease the harvest cost along the transmission line 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 adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines. Soil compacted by heavy equipment used to access the line will discourage regrowth.

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

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. In other words, the cost of fencing an acre of lost forest land would exceed the value the feet off fence. In essence, the cost of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. The cost of fencing $\frac{1}{4}$ mile of fencing to be \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing $\frac{1}{4}$ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011

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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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

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,

Judy S. Elliott
Signature

Linda L. Elliott
Printed Name:

Mailing Address: 1503 Oak St.
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.

August 2, 2019

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

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing $\frac{1}{4}$ 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.

Judy S. Elliott

Signature

Linda L. Elliott

Printed Name

Mailing Address: 1503 Oak St.
La Grande, OR 97850

8/4/19

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.

*Linda L. Elliott -
1503 Oak St.
La Grande, OR 97850*

8/4/19

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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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,

Linda L. Elliott

8/4/19

Signature

Printed Name: Linda L. Elliott

Mailing Address:

1503 Oak St.
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:

**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,

Linda L. Elliott

Signature

8/4/19

Printed Name: Linda L. Elliott

Mailing Address: 1503 Oak St.
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, 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.

*Jmids S. Elliott - Linda L. Elliott
1503 Oak St.
LA GRANDE, OR 97850*

8/4/19

BROCK EVANS, PRESIDENT EMERITUS
ENDANGERED SPECIES COALITION
1310 ALDER STREET, LA GRANDE OREGON 97850
(202) 425-1517; brockevans2004@gmail.com

August 18, 2019

RECEIVED

Energy Facilities Siting Council
c/o Kellen Tardawether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St., NE
Salem, OR 97301
Kellen.Tardarwether@oregon.gov

AUG 20 2019

Department of Energy

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 Beyler and Members of the Council:

Nearly all of my career has been devoted to advocating, strategizing, and devising ways and means of protecting as much as possible of the magnificent – often unique, and nearly always irreplaceable! – wildlife and plant habitats here in Oregon... as well as in many other landscapes and habitats across the rest of Northwest North America, Alaska to California.

These efforts began in 1967, when I left a Seattle law practice to accept a new position, "Northwest Conservation Representative," for the Sierra Club and Federation of Western Outdoor Clubs. Beginning with the long struggles to protect those precious landscape/habitats in Hells Canyon, in the Catharine Creek and Minam valley portions of the Eagle Cap Wilderness, plus many other related land use issues across the whole of NE Oregon, I feel I have learned much about what it really takes to ensure that these beautiful and special habitats will remain, as our National and State Heritage, to be passed on into a ever-more uncertain future.

Beginning in the 1980s, acting first as Vice President for National Issues of the National Audubon Society, then later as Executive Director of the Endangered Species Coalition, (each in Washington DC), my 'learning curve' was greatly enhanced by many more years of detailed, and constant, contacts with scientists, researchers, other advocates, and wildlife specialists, on a host of endangered/threatened species issues.

It is in that context and with that background of experience that I write today, to comment about Idaho Powers' faulty and seemingly illegal "Noxious Weed Plan" (DPO Attachment 1-5) as well as their seeming failure to take into account, in any way, other parts of the Oregon Conservation Strategy (hereinafter OCS).

As you know, the OCS has been Oregon's statewide strategy for conserving our fish and wildlife. It has used the best available science to create, both a broad overarching Vision, and a conceptual framework , for the long-term conservation of Oregon's native fish and wildlife, as well as invertebrates, plants, and algae. The OCS emphasizes *proactively conserving* declining species and habitats, in order to reduce the possibility of future federal or state listings. It is not a regulatory document -- but rather a proactive one, e.g., it recommends opportunities for voluntary actions that will greatly improve the efficiency and effectiveness of conservation in Oregon.

One would think that a wealthy Corporation like Idaho Power (hereinafter IPC), would seize the opportunity presented by OCS, to voluntarily step forward and take positive measures to eliminate, or mitigate at least, some of the worst land-and-habitat - and permanent! --destructive parts of its Proposal.

But no! Under the OCS, IPC's B2H project clearly meets OCS' definition of a Key Conservation Issue (KCI), namely that "*(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 most obvious Key Conservation Issue, neither the OCS, nor its Goals, are mentioned in IPC's application at all! Consider OCS' Land Use Planning Goal 1: *Manage land use changes to conserve farm, forest, and range lands, open spaces, natural od scenic recreation areas, and fish and wildlife habitats.*

Neither the current Proposed Route nor the Morgan Lake Alternative of IPC's Application to EFSC takes these in to account! Even if we ignore the growing body of evidence that the B2H Project is likely not needed anymore at all --given the lowered demand and constantly improving 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' according to their comprehensive list of affected resources... yet IPC has abandoned that Alternative, in favor of two other routes -- hugely more destructive even more harmful, thus even more deplored, by most Union County residents.

For example, how is OCS' 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 the Rice Glass Hill property, proposed as a State Natural Area? Is Goal 1 being met when noxious weeds are spread by B2H across many of Union County's finest elk meadows and elk wintering habitat?

Clearly those Goals are not being met; and IPC, just as clearly, has no intention of so doing. We would have appreciated at least some discussion – of those goals.

Another specific example of such failures regards the five State listed rare plant species (DPO Exhibit Q) within the B2H "analysis area". IPC claims that only two of these rare species (Mulford's milkvetch and Snake River goldenweed) will suffer

"direct impacts", from blading with heavy equipment. IPC claims that "Avoidance and minimization measures ... described in Section 3.5.4 will "mitigate" impacts. But upon reading 3.5.4, we find that this 'mitigation' consists of "a minimum buffer of 33 feet between the disturbance and the edge of the T&E occurrence". But... the much-needed - sheer *survival habitat* for these plants will be completely fragmented by a thirty three - or even at a few hundred - foot buffer. This 'mitigation' will not - cannot - prevent invasion by noxious weeds! These species and many others, (see below) will, simply, suffer *irreparable* damage if B2H is permitted . The Oregon Conservation Strategy rightly recognizes that "invasive species are the second-largest contributing factor causing native species to become at-risk of extinction in the United States."

Time and space does not allow a more complete description of other plant species, which will likely be greatly and adversely affected by B2H; nor, herein, an analysis of B2H's likely impact on Sage Grouse's grassland habitats, Goshawk's native forest habitats, and Bull Trout's lake and river habitats, each of which are often crossed (thus likely destroyed) by the 306-mile routing of several thousand 180' Transmission Towers, as described in the Proposal. Based upon what we have seen on the land itself, all of those habitats will be adversely -- probably permanently-- harmed. We will be happy to provide more such information as needed.

Another obvious lack in IPC's Application is its failure to discuss Strategy Habitats, as outlined in the OCS. In Union County alone, such Strategy Habitats include Grasslands, Late Successional Mixed Conifer Forest, and Ponderosa Pine Woodlands - each of which would be seriously, likely irreparably, damaged by the B2H proposal as set forth in IPC's current Application. The IPC neglects to even address Strategy Species as they are described in the OCS, viz : "*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 a "Proposal," which is practically guaranteed to devastate so much of Northeast Oregon's increasingly scarce Habitats and Species, not even respond to our own State's Conservation Strategy?

Thank you for your consideration of our views about noxious weeds and invasive plants, plus the very damaging impacts to key Strategy Species and Habitats .

To all of which, we would add here-- personally, a very human concern: an equally huge impact on local lifestyles and landscapes, which will be visited upon us locals, if this "Parade" of strange-looking (nearly 2x as massive as anything now out there) and thus 'alien,' Transmission Towers, is approved. Simply put, the IPC proposal would create a 306-mile Permanent Industrial Zone across NE OR, permanently changing the landscapes and vistas 1st seen by our forebears... And, treasured by us!

Brock Evans



Other Economic
Policy Staffer Mr
John Shantz, OR
Ga Shantz, OR
97350

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY



Kellen Janda (wetter) Senior Lobbyist

Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
503-373-7422 ext 300

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 $\frac{1}{4}$ 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:

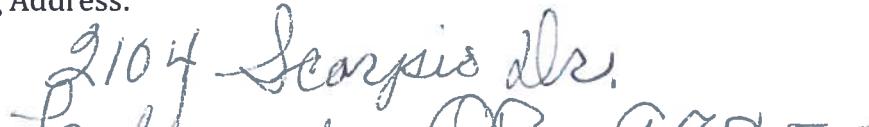
The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained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


2104 Scarpis Dr., MD 20001

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 affects 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:

Char Evans

Mailing Address:

2104 Scorpio Dr. - La Grande, OR 97850

Email:

charevans36@gmail.com

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

Dear Chair Beyeler and Members of the Council:

I respectfully request that this letter protesting issuance of a Site Certificate for the proposed Boardman to Hemingway Transmission Project be entered on the record.

Specifically, the applicant has failed to acknowledge the presence of a Federal and State-listed, Threatened species, and has failed to identify Category-1, Critical Habitat.

The Draft Proposed Order (DPO), p. 304, lines 20-26, fails to list Bull Trout, a listed State-Sensitive Threatened Species, also listed as Threatened by USFWS. OAR-345-021-0010 (1)(p) requires identification of all fish and wildlife at the proposed location, and identification of habitat classification categories, as set forth in OAR-635-415-0025, in order to comply with OAR-345-022-0060, requiring identification of habitat categories and required mitigation. The applicant has failed to comply with these requirements!

The Grande Ronde river watershed contains a well-documented population of Bull Trout. By statute, wherever a portion of a watershed contains a Threatened or Endangered species, the entire watershed is under federal protection. The Grande Ronde river watershed encompasses the entirety of Union county, and the majority of Wallowa county. As evaluated in the DPO, ASC Exhibit P, suitable habitat used by state-listed Threatened and Endangered species is designated pursuant to ODFW's Habitat Mitigation Policy, and EFSC's Fish and Wildlife Habitat standards, as Category-1 Habitat, where any impact, direct or indirect is prohibited. There is NO mitigation for Category-1 Habitat!

The DPO, p. 304, line 32, through p. 307, line 21, acknowledges that there will be impact, but is unable to quantify it. Since any impact is prohibited, the magnitude of impact becomes irrelevant.

The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080, as noted above.

In view of the fact that sufficient recovery of the Bull Trout population to remove its Threatened status is reliably estimated to be a matter of decades, issuance of a **Site Certificate should be denied, with prejudice!**

Sincerely,

Char Evans

Printed Name: *Char Evans*

Address: *2104 Seapris Dr. La Grande, OR 97850*

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: 2104 Scarpio 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.

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:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I dou it was extensive because it is entirely 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) 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 a 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

1
2

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: Char Evans

Address:

2104 Scarsel Dr. La Grande, OR
97850

TARDAEWETHER Kellen * ODOE

From: farmer4342@gmail.com
Sent: Monday, August 19, 2019 4:32 PM
To: B2H DPOComments * ODOE
Subject: Timber Losses oak 4
Attachments: Timber Losses--Goal 4 (1).docx

August 20, 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.

Current studies associated with valuing the carbon sequestration activities of forests as well as the undisturbed land with the additional weeds, grasses and soil indicate its highest value may be its positive impact on climate change. The Oregon legislature recently was poised to enact a carbon tax on activities that release carbon dioxide to the atmosphere. Idaho Power ignores that cost in terms of estimating the tons of carbon dioxide the construction and operation of the B2H project would release into the atmosphere.

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. Additionally, "border trees" next to the cleared area will be weakened due to the lack of protection provided by sheltering trees and therefore subject to damage or destruction.

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 $\frac{1}{4}$ 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 $\frac{1}{4}$ 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: Albert J. Farmer

Mailing Address:
P.O. Box 864
Union, Oregon 97883

August 10, 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 345-022-0020 Structural Standard:

"(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(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 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.

345-022-000 (2)(D) states the IPC's ASC must describe "The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...** Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes." ASC, page H-12. IPC will cite their instruction letter to DOGAMI Dated 17 December, 2012 ,as attachment to the ASC, agreeing that "in transmission line construction, design for wind and ice forces is more than sufficient to account for seismic forces." DOGAMI made a requirement, however, that "The degree of investigation should be contingent on the type of hazards present, facility to be constructed, and potential danger to human safety. The degree of analysis will vary across the Project corridor." Despite the strength of the tower structures, the state of the earth beneath the towers still remains an uncharted risk.

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.

Commenter signature

Skye Farnam

69234 Pumperkin Ridge Rd
Summerdale OR 97882

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.

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.

Personius, S. F. Compiler, 202c, Fault number 802a West Grande Ronde Valley fault zone, Mount Emily section, in Quaternary fault and fold database of the United States: U. S. Geological Survey website <http://earthquakes.usgs.gov/hazards/qfault>, accessed 11/16/2016 06:23 PM

Schlicker, H. G. and Deacon R. J. 1971 Engineering Geology of the La Grande Area, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open File Report O-1971-03, 16 p., 1 plate, scale 1:24,000.

State of Oregon Department of Geology and Mineral Industries; Publications Center;
<http://www.oregongeology.org/pubs>.

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: 707 Hillcrest Drive
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 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 $\frac{1}{4}$ 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.

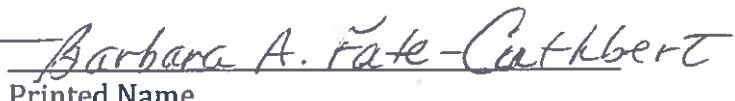
In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

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: 707 Hillcrest Drive
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:

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: Barbara A. Fate-Cuthbert
Mailing Address: 707 Hillcrest Drive
La Grande, OR 97850

707 Kellenoch Drive
La Grande, OR 97850

PORRTLAND OR 972

14 JULY 2010 PM 5:1



Oregon Dept. of Energy
c/o Helen Landweber, Ph. D., Acting Director
550 Capitol Street NE
Salem, OR 97301

3730133742 0009

|||||

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

RECEIVED

AUG 16 2019

DEPARTMENT OF ENERGY

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: *707 Hillcrest Drive
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.

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 $\frac{1}{4}$ 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 $\frac{1}{4}$ 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:

707 HILLCREST DRIVE
LA GRANGE 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,



Name: JEFF CUTHEBERT

Address: 707 Hildreth Drive
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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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)(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: SEFF CUTHBERT

Mailing Address: 707 HILLCREST DRIVE
LAS CRANES, 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, 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,



Name: JEFF COMBERT
Address: 907 MILECREST DRIVE
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:

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:

JEFF CUMBERT
707 HILLCREST DRIVE
LA GRANGE, OR 97850

707 Hillcrest Drive
SaxGrande, OR 97850

PORLAND, OR 972

15 AUG 2019 PM 5 L



Oregon Department of Energy
Hellen Tardaeuether, Sr. Site Analyst
550 Capital St. NE
Salem, OR 97301

57301-374299

August 5, 2019

RECEIVED

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

AUG 16 2019

DEPARTMENT OF ENERGY

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.

I 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
for
and

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: Barbara A. Fate - Cuthbert

Address: 707 Hillcrest Drive
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,



Name: Barbara A. Fate-Cuthbert

Address: 707 Hillcrest Drive
LaGrande, OR 97852

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 $\frac{1}{2}$ 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 $\frac{1}{2}$ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, its 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 $\frac{1}{2}$ 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)(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 $\frac{1}{2}$ 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 $\frac{1}{2}$ 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: Barbara A. Fate-Cathbert

Mailing Address: 707 Hillcrest Drive
La Grande, OR 97850

ESTERSON Sarah * ODOE

From: Alan Feves <Alan@feves.com>
Sent: Thursday, August 22, 2019 7:53 AM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] B2H DPO

August 21, 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 Chairman Beyeler and Members of the Council:

I am a long term resident of Pendleton, I wish to express my concerns about Exhibit U (3.5.6.2 and 3.5.6.5) and the negative impacts the B2H line could have on fire and flood protection to the residents of Southwest La Grande, particularly if the Alternate Route is adopted.

I would submit that this project is in violation of Oregon Administrative Rule 345-022-0110, which requires that the construction and operation of the facilities

“are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, *storm water drainage*, solid waste

management, housing, traffic safety, police and *fire protection*, health care and schools” (italics mine).

Fire Protection: I am glad that Idaho Power acknowledges the fire risks in their Draft Protective Order, as in Exhibit U-3.5.6.2 (p. U-24): “Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site.”

This is noteworthy because in the Morgan Lake area or the hills to the south and west of La Grande, where the proposed construction would take place, fire would likely be catastrophic, with hundreds of homes located down the canyons of Mill Creek and Deal Creek. In addition, Grande Ronde Hospital, La Grande High School, and Central Elementary School all lie a short distance from the mouth of Deal Canyon. Note that both canyons lie to the south or west of town; prevailing winds in this region come from those directions, and the down-valley wind effect common in late afternoons and evenings would carry the flames directly down these drainages. As a result, the 1973 Rooster Peak wildfire burned over a large section southwest of town, coming within a quarter-mile of Grande Ronde Hospital (<https://www.lagrandeobserver.com/localstate/4036445-151/recalling-the-fire-of-august-1973>).

In Idaho Power's own application, JB Brock, Union County Emergency Manager, states that "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight. He stated that during construction it would be challenging in a rural location for ambulance calls. It would require local coordination of emergency response plans. Operation of the project has the potential for impacts. He stated that the project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6)

Idaho Power's application also acknowledges that "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew. In addition, much of the analysis area includes open remote lands where access is limited. A fire in one of these areas may not be immediately identified. However, once a fire has been identified, the fire districts responding to requests for information have indicated that average response times range from about 8 to 40 minutes, depending on the location (Table U-10)." (p. U-16)

However, the Table U-10 claims that response times for Union County Rural Fire Department range from *4 to 8 minutes* (p. U-17). This is an absurd claim for Morgan Lake, a narrow gravel road which gains over 1,000 feet of elevation in less than 2 miles. Starting from its origin at the end of Walnut Street, a vehicle would have to travel up this hill at an average speed of almost 30 miles per hour to reach Morgan Lake in four minutes—a speed which would be unsafe on this road for even a passenger car, let alone a fire engine. This does not take into account the approximately two additional miles from the La Grande fire station to the base of Morgan Lake Road.

Storm Water Drainage and Flood Protection: In addition, road building, blasting, and earth moving activities threaten to cause erosion and sedimentation in the south and west hills, worsening the possibility of flooding in the Mill Creek, Miller Creek, and Deal Creek drainages. Deal Creek and Miller Creek areas have flooded in recent years, causing flooded basements, washed-out driveways; this happened at our house on March 23, 2019, as a result of flooding of a creek known to locals as "Miller Creek." Miller Creek is so small it is not even shown on topographic maps (it only shows as a drainage); yet it caused \$800 worth of damage to our driveway, eroded streets and gutters, and deposited gravel throughout the neighborhood. As a result of this same flood, La Grande city crews spent major time monitoring and repairing flooding on Mill Creek in the area of C Avenue (<https://www.lagrandeobserver.com/newsroomstafflist/7079739-151/waters-rising>).

Idaho Power claims to mitigate storm water drainage in Exhibit U, 4.1.3 (p. 27), yet they plan to build a new road a short distance away and directly uphill from the same site that flooded our home earlier this spring, as shown by the following map (upper center, the road which begins at Modelaire St.). Since Miller Creek is not even shown as such on existing topo maps, it is unlikely that they are even aware of the topography of this area or the potential for flood damage downhill from their proposed road:

https://boardman2hemingway.blob.core.windows.net/maps/03_Union/Map_51.pdf

This is not the only such incident in recent memory. On May 25, 2011, major floods swept through La Grande and caused flooding along B, C, M and N as well as Alder Street, resulting in both the city and county declaring a state of emergency. Streets were damaged, basements were submerged, and some residents had to be evacuated (<https://www.lagrandeobserver.com/localstate/4083593-151/county-city-move-forward-with-emergency-declarations>). "Norm Paullus, director of La Grande Public Works, said water poured out of the Mill Creek and Gill Creek drainages in La Grande's South Hills district, clogging pipes and spilling into southside streets, including B, C, M and N avenues, and Alder Street. Some families reported flooded basements. . . The west end of C Avenue and driveways in that area were washed out, Paullus said. No injuries were reported,

but people in some neighborhoods were evacuated and damage to southside homes and outbuildings was extensive." (<https://www.lagrandeobserver.com/localstate/4083480-151/rain-swollen-creeks-flood-streets-homes>)

In summary, the B2H transmission line poses significant threats to the southwest hills of La Grande in terms of fire risk, particularly in Mill Creek canyon directly downhill from Morgan Lake. They also are likely to exacerbate problems with storm water drainage in the west hills, increasing the likelihood of seasonal flooding resulting in damage both to private property (homes, basements, and driveways) and to city streets in this part of town. As such, they would be in violation of OAR 345-022-0110, and thus I recommend that the Council reject the proposal to construct this line.

Sincerely,

Alan Feves
304 NW Furnish
Pendleton OR 97801

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

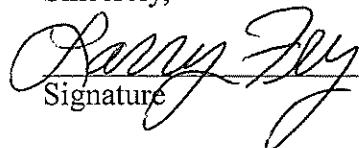
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: “Sources 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:



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 Findley

Mailing Address (mandatory)

3535 Butte Drive
Ontario, OR

Phone Number (optional) (541) 889-5908

Email Address (optional) _____

Today's Date: 6/18/19

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.)

See attached

Stop Idaho Power Letter for June 18, 2019 EFSC Meeting

Presented by Roger Findley, Chairman Stop Idaho Power

Dear EFSC,

In September, 2008, many landowners in Malheur County were notified by letter from Idaho Power that it had filed a Notice of Intent with EFSC to build a 500 kV power line from Hemmingway, Idaho, to Boardman, Oregon, better known as the B2H line. Idaho Power was on a “fast track” with the proposed power line and planned on construction in 2012 with power flowing in 2013. Proposed in the B2H route were 54 miles of line in Malheur County all on private land with 38 miles going over prime crop land designated as Exclusive Farm Use or EFU. The landowners immediately met and organized Stop Idaho Power (SIP), which has about 300 members. The one and only stated goal of SIP was “to keep the B2H power line off EFU land in Malheur County”. SIP started having meeting with Idaho Power trying to convince them the power line was in the wrong location. After a series of meetings, Idaho Power reconsidered its position and halted its Notice of Intent and initiated meetings with all concerned landowners, local governments, government agencies, environmental groups and others to determine the best route for the B2H power line. Though it has taken years longer to get back to this point in the process, the B2H power line through Malheur County has met 90% of SIP’s goal. There are two areas SIP would like to see a different route for B2H. One is near Adrian where B2H crosses EFU land. The alternative route crosses the Owyhee Wild and Scenic River. Someone has decided that Wild and Scenic Rivers is a higher priority than EFU land, both have to be addressed in EFSC’s criteria. The other area of concern is Northwest of Vale where the B2H again crosses EFU land. The alternate route there crosses Sage Grouse habitat. Again, both EFU land and Wildlife habitat are points that have to be addressed by EFSC. Again someone has decided that Sage Grouse habitat is a higher priority than EFU land. SIP is asking EFSC to evaluate ORS 345-20-10 which defines what EFU land is and the protection it is afforded. We also ask for EFSC to evaluate ORS 215.275 which lists the criteria that allows the power line such as B2H to cross EFU land.

In summary, SIP is generally well pleased with Idaho Power for stopping the fast track process in 2010 and listening to all the stakeholders. Through a collaborative efforts we have devised the best possible route for the B2H power line through Malheur County. SIP would like to see Idaho Power go ahead and construct the power line. Most all members of SIP are engaged in farming. With pressure from the Clean Water Act, many acres of EFU land are being converted from surface flow irrigation to either sprinkler or drip irrigation. Making this switch requires energy to run pumps and motors. Also SIP understands that the greater Boise area is experiencing a booming population growth. Both these factors together contribute to greater consumption of electrical power each year. Though some of this increased demand has been met through the use of renewable energy sources such as wind and solar, irrigators need power 24/7, just not only when the wind blows or the sun shines. SIP applauds Idaho Power for looking into the future and trying to provide for our needs.

Sincerely, Roger Findley

<p>1 testimony.</p> <p>2 Department staff will track the time for each 3 commenter, and the commenter should be able to view how 4 much time is remaining. If the commenting time ends and 5 the commenter is still speaking, if we have some free 6 time I will let you continue; I won't just cut you off. 7 But we will transition to the next speakers as soon as 8 reasonably possible.</p> <p>9 Please be respectful of the allotted time and 10 the other speakers. If I or a Council member asks for a 11 clarification or questions the commenters, the time will 12 be stopped for the question and response and then 13 restarted to provide the commenter with the full time 14 allotment.</p> <p>15 Any requests made to EFSC will be brought up 16 at the conclusion of the public testimony opportunity of 17 the hearing.</p> <p>18 Today's hearing as well as all of the public 19 hearings on the Boardman to Hemingway draft proposed 20 order are being documented by a certified court 21 reporter, and there will be transcripts of the testimony 22 made available after the completion of the public 23 hearings. We're also recording the hearing today. The 24 presentations, written comments, and oral testimony are 25 part of the decision record for the proposed facility.</p>	<p>Page 22</p> <p>1 5:04 p.m. All speakers please provide your name and 2 address for the record at the beginning of your 3 testimony.</p> <p>4 I'm going to call up at this point the first 5 two, and they were the order that they were given to me, 6 the first one is Isaac Martinez, and then the second to 7 come up will be Carl and Julie Morton.</p> <p>8 UNIDENTIFIED SPEAKER: Isaac isn't here. He 9 wants to be on the list. He wants to be contacted.</p> <p>10 HEARING OFFICER WEBSTER: He wants just to 11 receive notice?</p> <p>12 UNIDENTIFIED SPEAKER: Yes.</p> <p>13 HEARING OFFICER WEBSTER: The next lucky 14 person is Roger Findley, and following Mr. Findley we'll 15 hear from Gary Pearson.</p> <p>16 MR. ROGER FINDLEY: Good evening. It's an 17 honor to have you here in Ontario. It's not very often 18 we get visitors from all over the state to this part of 19 eastern Oregon.</p> <p>20 I'm Roger Findley. I'm the chairman of Stop 21 Idaho Power. It's an organization in Malheur County. 22 And this is a letter that I'm reading on behalf of Stop 23 Idaho Power.</p> <p>24 "Dear EFSC, In September, 2008, many 25 landowners in Malheur County were notified by letter</p>
<p>1 We are ready for the next slide.</p> <p>2 Pursuant to OAR 345-015-0220(5)(a) and (b), 3 please note the following: "A person who intends to 4 raise any issue that may be the basis for a contested 5 case must raise the issue in person at the hearing or in 6 a written comment submitted to the Department of Energy 7 before the deadline stated in the notice of the public 8 hearing," which we've said is July 23rd of this year. 9 "A person who intends to raise any issue that may be the 10 basis for a contested case must raise the issue with 11 sufficient specificity to afford the Council, the 12 Department of Energy and the applicant an adequate 13 opportunity to respond, including a statement of facts 14 that support the person's position on the issue."</p> <p>15 To raise an issue in a contested case 16 proceeding, the issue must be: Within the Council's 17 jurisdiction; raised in writing or in person prior to 18 the close of the hearing record, or close of the comment 19 period, which is July 23, 2019; raised with sufficient 20 specificity to afford Council, the Department of Energy, 21 and the applicant an adequate opportunity to respond.</p> <p>22 To raise an issue with sufficient specificity, 23 a person must present facts that support the person's 24 position on the issue.</p> <p>25 We will now begin the public testimony. It is</p>	<p>Page 23</p> <p>1 from Idaho Power that it had filed a Notice of Intent 2 with EFSC to build a 5,000 [sic] kilovolt power line 3 from Hemingway, Idaho, to Boardman, Oregon, better known 4 as the B2H line. Idaho Power was on a 'fast track' with 5 the proposed power line and planned on construction in 6 2012 with power flowing in 2013. Proposed in the B2H 7 route were 54 miles of line in Malheur County all on 8 private land with 38 miles going over prime farm [sic] 9 land designated as Exclusive Farm Use or EFU. The 10 landowners immediately met and organized Stop Idaho 11 Power (SIP), which has about 300 members. The one and 12 only stated goal of SIP was 'to keep the B2H power line 13 off EFU land in Malheur County.' SIP started having 14 meeting with Idaho Power trying to convince them the 15 power line was in the wrong location. After a series of 16 meetings, Idaho Power reconsidered its position and 17 halted its Notice of Intent and initiated meetings with 18 all concerned landowners," government officials, 19 "government agencies, environmental groups and others to 20 determine the best route for the B2H power line. Though 21 it has taken" many "years...to get back to this point in 22 the process, the B2H power line through Malheur County 23 has met 90 percent of SIP's goal. There are two areas 24 SIP would like to see a different route for B2H. One is 25 near Adrian [Oregon] where B2H crosses EFU land."</p> <p>Page 25</p>

<p style="text-align: right;">Page 26</p> <p>1 Someone is going to comment on that later. "The 2 alternative route," called the Double Mountain, does 3 cross "the Owyhee Wild and Scenic River. Someone has 4 decided that Wild and Scenic Rivers is a higher priority 5 than EFU land, both have to be addressed in EFU [sic] 6 criteria. The other...concern is Northwest of Vale 7 [Oregon] where the B2H [power line] again crosses EFU 8 land. The alternative route there crosses Sage Grouse 9 habitat. Again, both EFU and Wildlife habitat are 10 points that have to be addressed by EFSC. Again someone 11 has decided that Sage Grouse habitat is a higher 12 priority than EFU land. SIP is asking EFSC to evaluate 13 ORS 345-20-10 which defines what EFU land is and the 14 protection it is afforded. We also ask for EFSC to 15 evaluate ORS 215.275 which lists the criteria that 16 [does] allow the power line such as B2H to cross EFU 17 land.</p> <p>18 "In summary, SIP is generally well pleased 19 with Idaho Power for stopping the fast track process in 20 2010 and listening to all the stakeholders. Through a 21 collaborative [process] we have devised the best 22 possible route for the B2H power line through Malheur 23 County. SIP would like to see Idaho Power go ahead and 24 construct the power line. Most...members of SIP are 25 engaged in farming. With pressure from the Clean Water</p>	<p style="text-align: right;">Page 28</p> <p>1 might be a stranger to you folks, I assure you I'm not a 2 stranger to this project or, in fact, Idaho Power. 3 I'm a long-time resident of Malheur County, 4 and I've been involved as a concerned citizen with the 5 B2H project for over 10 years. That involvement 6 includes being in the first meetings with officials from 7 Idaho Power outlining our reasons for resisting their 8 original planned route for the 500-kV power line. I was 9 on the citizens advisory panel set up by Idaho Power, 10 which resulted in numerous additional meetings with 11 Idaho Power which finally resulted in an alternative 12 route that would avoid Malheur County exclusive farm use 13 agricultural land.</p> <p>14 I have testified in front of several 15 government entities, including a government hearing in 16 Salem. I am a board member of the nonprofit entity 17 known as Stop Idaho Power. That group was instrumental 18 in the decision by Idaho Power to institute the claims 19 advisory process in the first place.</p> <p>20 The only reason I am outlining my history with 21 this project is to document for the record the fact that 22 I parrot the same exact issues that Roger Findley just 23 outlined involving the entire process, and as well as 24 the fact that the area near Adrian and north of Vale, 25 the line is still going across some acreage that is</p>
<p style="text-align: right;">Page 27</p> <p>1 Act, many acres of EFU land are [now] being converted 2 from surface flow...to either" drip or sprinkler 3 irrigation. "Making this switch requires energy to run 4 pumps and motors. Also SIP understands that the greater 5 Boise area is experiencing a booming population growth. 6 Both these factors together contribute to greater 7 consumption of electrical power each year. Though some 8 of this increased demand has been met through the use of 9 renewable energy...such as wind and solar, irrigators 10 need power 24/7...not only when the wind blows or the 11 sun shines. SIP applauds Idaho Power for looking into 12 the future and trying to provide for our needs.</p> <p>13 "Sincerely, Roger Findley."</p> <p>14 HEARING OFFICER WEBSTER: Thank you, 15 Mr. Findley.</p> <p>16 Just before we hear from Mr. Pearson, the next 17 one up after Mr. Pearson will be Jay Chamberlin.</p> <p>18 And Mr. Findley, for the record, if you could 19 please state your address.</p> <p>20 MR. ROGER FINDLEY: 3535 Butte Drive, Ontario, 21 Oregon.</p> <p>22 HEARING OFFICER WEBSTER: Thank you. 23 Mr. Pearson, your name and address.</p> <p>24 MR. GARY PEARSON: Thank you. 25 Hello. My name is Gary Pearson. And while I</p>	<p style="text-align: right;">Page 29</p> <p>1 classified as EFU land.</p> <p>2 And I further want to document the fact and 3 get on record that after 10 years of effort involving 4 hundreds of hours of time, I do not want to be shut out 5 from further proceedings and/or hearings down the road 6 if they become necessary.</p> <p>7 I would also like to applaud Idaho Power in 8 having the wisdom to listen to the citizens of Malheur 9 County, and work with us to change their original plan 10 and work to find an alternative route that would avoid 11 damaging the Malheur County agricultural industry, which 12 is basically our only industry. We are very, very close 13 to that goal.</p> <p>14 Thank you.</p> <p>15 HEARING OFFICER WEBSTER: Mr. Pearson, if you 16 would please just add your address for the record.</p> <p>17 MR. GARY PEARSON: I live at 654 King Avenue, 18 Ontario, Oregon 97914.</p> <p>19 HEARING OFFICER WEBSTER: Thank you.</p> <p>20 MR. GARY PEARSON: If you'd like a copy of 21 this, I would like to give you a clean copy. This looks 22 like a road map because I made many changes in the last 23 10 minutes.</p> <p>24 HEARING OFFICER WEBSTER: Before we hear from 25 Mr. Chamberlin, the next up is Irene Gilbert.</p>

Stop Idaho Power Letter for June 18, 2019 EFSC Meeting

Presented by Roger Findley, Chairman Stop Idaho Power

Dear EFSC,

In September, 2008, many landowners in Malheur County were notified by letter from Idaho Power that it had filed a Notice of Intent with EFSC to build a 500 kV power line from Hemmingway, Idaho, to Boardman, Oregon, better known as the B2H line. Idaho Power was on a "fast track" with the proposed power line and planned on construction in 2012 with power flowing in 2013. Proposed in the B2H route were 54 miles of line in Malheur County all on private land with 38 miles going over prime crop land designated as Exclusive Farm Use or EFU. The landowners immediately met and organized Stop Idaho Power (SIP), which has about 300 members. The one and only stated goal of SIP was "to keep the B2H power line off EFU land in Malheur County". SIP started having meeting with Idaho Power trying to convince them the power line was in the wrong location. After a series of meetings, Idaho Power reconsidered its position and halted its Notice of Intent and initiated meetings with all concerned landowners, local governments, government agencies, environmental groups and others to determine the best route for the B2H power line. Though it has taken years longer to get back to this point in the process, the B2H power line through Malheur County has met 90% of SIP's goal. There are two areas SIP would like to see a different route for B2H. One is near Adrian where B2H crosses EFU land. The alternative route crosses the Owyhee Wild and Scenic River. Someone has decided that Wild and Scenic Rivers is a higher priority than EFU land, both have to be addressed in EFSC's criteria. The other area of concern is Northwest of Vale where the B2H again crosses EFU land. The alternate route there crosses Sage Grouse habitat. Again, both EFU land and Wildlife habitat are points that have to be addressed by EFSC. Again someone has decided that Sage Grouse habitat is a higher priority than EFU land. SIP is asking EFSC to evaluate ORS 345-20-10 which defines what EFU land is and the protection it is afforded. We also ask for EFSC to evaluate ORS 215.275 which lists the criteria that allows the power line such as B2H to cross EFU land.

In summary, SIP is generally well pleased with Idaho Power for stopping the fast track process in 2010 and listening to all the stakeholders. Through a collaborative efforts we have devised the best possible route for the B2H power line through Malheur County. SIP would like to see Idaho Power go ahead and construct the power line. Most all members of SIP are engaged in farming. With pressure from the Clean Water Act, many acres of EFU land are being converted from surface flow irrigation to either sprinkler or drip irrigation. Making this switch requires energy to run pumps and motors. Also SIP understands that the greater Boise area is experiencing a booming population growth. Both these factors together contribute to greater consumption of electrical power each year. Though some of this increased demand has been met through the use of renewable energy sources such as wind and solar, irrigators need power 24/7, just not only when the wind blows or the sun shines. SIP applauds Idaho Power for looking into the future and trying to provide for our needs.

Sincerely, Roger Findley

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,

Justin D. Flick

Signature

Justin D. Flick

Printed Name:

Mailing Address: 8. Pine Crest Drive 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 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 $\frac{1}{4}$ 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.

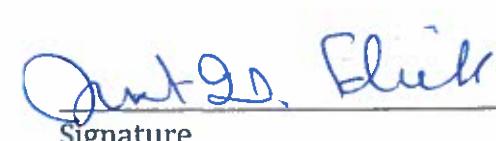
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming 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.

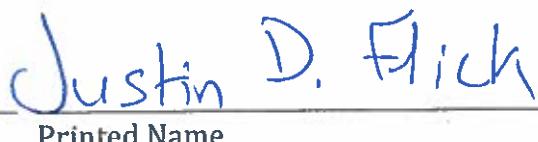
In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

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: 8 Pine Crest Drive, La Grange OR
97950

RECEIVED

AUG 12 2019

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

DEPARTMENT OF ENERGY

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,

Justin D. Fluck

Signature

Printed Name: Justin D. Fluck
Mailing Address: 8 Pine Crest Drive La Grande OR
97850