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August 16, 2019

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 May 23, 2019.

Chair Beyeler and Members of the Council:

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).

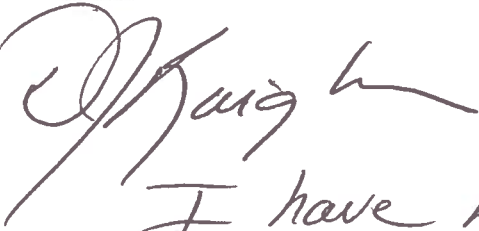
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007),

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,



Name
Address

I have been a proud, thankful
resident of the Grande Ronde Valley
for 28 yrs.

P.O. box 71

Cove OR
97624

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 1/4 mile of blasting site.


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

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: Doug Kaigler

Address:

P.O. box 71
Cove OR
97824

long time resident. of
Union County.



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) Sheri Kanig
Mailing Address (mandatory) 331 S. West Street
Yreka, CA 96097
Phone Number (optional) (541) 228-5440 Email Address (optional) scanig@hotmail.com
Today's Date: 6-20-19

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

<p style="text-align: right;">Page 94</p> <p>1 \$100,000 in funding for improvements to Morgan Lake to 2 mitigate the impacts on recreation should the Morgan 3 Lake alternative be constructed. Idaho Power has agreed 4 to this condition as well.</p> <p>5 I want to say this again: Please do not 6 interpret the City's willingness to agree to 7 mitigations, that I just meant it as support or 8 acceptance of the project. We remain firmly opposed, 9 firmly opposed to the project for the reasons identified 10 in our 2017 comments of the preliminary application.</p> <p>11 We respectfully ask that EFSC require the 12 mitigation we are seeking in the final order if the 13 project is approved. And while I have only a modicum of 14 the compassion as Peter Barry, just say no.</p> <p>15 HEARING OFFICER WEBSTER: Next, we have 16 Mr. Larkin followed by Sheri Kanig.</p> <p>17 MR. GREG LARKIN: Good evening. My name is 18 Greg Larkin. I reside at 59655 Morgan Lake Road. I 19 live on the top of Morgan Lake Road directly across from 20 the entrance into Morgan Lake.</p> <p>21 The Morgan Lake alternative route of the Idaho 22 Power transmission line would be located approximately 23 120 yards from my residence. I'm in the process of 24 developing my second approved home site on this 25 property, which would be even in a closer location of</p>	<p style="text-align: right;">Page 96</p> <p>1 the wind patterns to different velocities of wind to 2 seek some relief from this, and I've been able to create 3 this type of environment here.</p> <p>4 Now, the facts of this B2H coming through my 5 property, without it being there, can almost put a 6 person a little over the top that way. It affects me 7 every second of every day. It's a 100-pound drill 8 lodged in their back, to characterize it.</p> <p>9 If this transmission line were to go through 10 at this location, I would no longer be able to reside or 11 fulfill my lifetime dreams and goal of living here. And 12 I don't have the time nor the resources or anything else 13 to seek the relief I've sought or the little bit of 14 tranquility to deal with this issue. Well, I will leave 15 it at this, and then I'll address some more issues.</p> <p>16 As far as pertaining to the sound, the static 17 hiss of this line for the peace and tranquility of our 18 lake up there. We have a gas line that goes through, 19 this line and this route will cross this gas line twice. 20 If we have heavy fogs or a rainstorm, that can transmit 21 a spark to the ground and create a fire, the electronic 22 field.</p> <p>23 Again, I'll repeat myself. The health hazards 24 of this to people in this close of proximity. And the 25 deterioration, even in the ground, the potential</p>
<p style="text-align: right;">Page 95</p> <p>1 this transmission line in proximity to it.</p> <p>2 I spent many years as a locomotive engineer 3 for the Union Pacific Railroad. I suffered a permanent 4 disability of hearing loss and tinnitus that forced me 5 away from this career.</p> <p>6 I can read you a screenshot from Wikipedia on 7 tinnitus: "Tinnitus is the hearing of sound with no 8 external sound present. While often described as a 9 ringing, it may also sound like a clicking, hiss or 10 roaring. Rarely, unclear voices or music are heard. 11 The sound may be soft or loud, low pitched or high 12 pitched and appear to be coming from one ear or both. 13 Most of the time, it comes on gradually. In some 14 people, the sound causes depression or anxiety and can 15 interfere with concentration."</p> <p>16 I am real bad in the last 3 years. When I 17 left the railroad in '87, I had a testing in 1985, my 18 ears rang at that time 57 decibels. Approximately 19 10 years ago, one ear was at 72 decibels, the other one 20 was at 75 decibels.</p> <p>21 Now, I have great concerns, and I've been 22 around the transmission lines before where I cannot 23 stand them, and if this is this close to my home. And 24 then to cope with it up there, or to tolerate it, I've 25 done a lot of pruning and thinning of the trees to get</p>	<p style="text-align: right;">Page 97</p> <p>1 deterioration in the ground of this gas pipeline. The 2 technology, I don't know, as it goes over, through this 3 route. It had to. There is no longer a route that was 4 the western route that was on the radar and it's 5 disappeared, it's gone away. And viably the effect on 6 our county here, if that route were to go through in 7 that direction, it would most likely have no less impact 8 on our county here, to the residents.</p> <p>9 I'm not a public speaker. I'll address it 10 further in some written comments. I'll have some 11 assistance on that.</p> <p>12 I thank you for your time.</p> <p>13 HEARING OFFICER WEBSTER: Thank you.</p> <p>14 We have Sheri Kanig, and following we will 15 hear from William Whitaker.</p> <p>16 MS. SHERI KANIG: Good afternoon or evening, 17 everyone. My name is Sheri Kanig, and I reside at 331 18 Southwest Street in Yreka, California. That is located 19 in the Klamath National Forest in Siskiyou County, 20 northern California. I am not a resident of La Grande 21 but a volunteer and a tourist.</p> <p>22 I have been a co-owner of a large logging 23 company in the Klamath National Forest for many years 24 and also participated in fire suppression. I guess my 25 issues today are regarding the fire danger because of</p>

<p style="text-align: right;">Page 98</p> <p>1 this line.</p> <p>2 I've also worked for the Happy Camp Ranger</p> <p>3 District in the Klamath National Forest and worked on</p> <p>4 active forest fires. I have flown with pilots over the</p> <p>5 fires and seen the devastation caused to the habitat and</p> <p>6 to the animals. The animals can't be forgotten.</p> <p>7 I have many relatives that dedicated their</p> <p>8 careers to protecting the towns and forests from</p> <p>9 wildland fires. These fires put the lives of</p> <p>10 firefighters, volunteers, residents, habitat, and</p> <p>11 wildlife in jeopardy.</p> <p>12 Living in Happy Camp at one time, I've been</p> <p>13 totally surrounded by a forest fire. All of our crew</p> <p>14 had to work on this fire. There were many dangers, we</p> <p>15 lost some of our vehicles, and the fire and long-lasting</p> <p>16 smoke caused severe health issues in many residents,</p> <p>17 including my father-in-law who passed away a couple of</p> <p>18 years later. He was a fire officer for the Forest</p> <p>19 Service for about 25 years.</p> <p>20 I'd like to talk about a fire that affected</p> <p>21 many people that I knew. In November of 2018, near</p> <p>22 Paradise, California, a fire started on the 56-mile</p> <p>23 Caribou-Palermo Electric transmission line. This fire</p> <p>24 started at 6:33 a.m. near a tower in Pulga -- I may be</p> <p>25 saying that wrong -- in Paradise. That day utility</p>	<p style="text-align: right;">Page 100</p> <p>1 say this area holds a serene and untouched beauty. The</p> <p>2 landscape and wildlife are stunning; the elk, the deer,</p> <p>3 everything that you see every single day.</p> <p>4 I spent the past two days on a parcel of land</p> <p>5 right across from Morgan Lake. We hiked for many hours</p> <p>6 and saw all the wildlife, the beauty, the untouched</p> <p>7 beauty of this area.</p> <p>8 I think that the building of this power line</p> <p>9 will devastate this beauty, and I feel that this should</p> <p>10 not go on. That is all I have to say.</p> <p>11 Thank you.</p> <p>12 HEARING OFFICER WEBSTER: Thank you.</p> <p>13 After Mr. Whitaker is Thomas Thompson.</p> <p>14 MR. WILLIAM WHITAKER: Good evening. My name</p> <p>15 is Bill Whitaker. I live here in La Grande at 1108 G</p> <p>16 Avenue, about a mile away from Morgan Lake Road.</p> <p>17 I'm vice chair of the Board of Oregon Rural</p> <p>18 Action. ORA is a member organization of the Stop B2H</p> <p>19 Coalition. ORA believes that local residents, ordinary</p> <p>20 people, should be the people who are able to decide the</p> <p>21 impact of issues that dramatically affect their lives,</p> <p>22 our lives, not corporate interests making those</p> <p>23 decisions.</p> <p>24 We have many concerns about the necessity for</p> <p>25 the cost of and the impact of the B2H transmission line.</p>
<p style="text-align: right;">Page 99</p> <p>1 workers discovered that a part had separated from an arm</p> <p>2 on the tower, and that is what started that portion of</p> <p>3 the fire.</p> <p>4 The Camp Fire in Paradise killed 85 people,</p> <p>5 destroyed 18,804 structures, and burned 153,336 acres.</p> <p>6 That is a huge devastation.</p> <p>7 Cal Fire also identified a second ignition</p> <p>8 site. The second fire was determined to be vegetation</p> <p>9 that got into an electrical distribution line, owned and</p> <p>10 operated also by PG&E. Not many people know that there</p> <p>11 was a second cause to that fire. Those fires both</p> <p>12 emerged.</p> <p>13 Many family and friends that I know live in</p> <p>14 Paradise. They lost their homes, their pets, their</p> <p>15 livelihood. How can that ever be recovered?</p> <p>16 If you drive through northern California on</p> <p>17 Interstate 5 from the Oregon border, you just have to</p> <p>18 look around. You could probably go 20 miles and notice</p> <p>19 there was another wildfire and the total devastation</p> <p>20 that it caused.</p> <p>21 Fires have increased each year that goes by</p> <p>22 and become larger and more devastation caused; animals,</p> <p>23 plants, people, homes. I mean, what can I say.</p> <p>24 As a tourist and visitor from a state</p> <p>25 devastated by wildfire each and every year, I can only</p>	<p style="text-align: right;">Page 101</p> <p>1 I will be submitting a detailed report, but in light of</p> <p>2 the fact that many of the things that you have heard</p> <p>3 already tonight, I won't repeat. I want to just speak a</p> <p>4 bit from my heart.</p> <p>5 Idaho Power stated that it intended to</p> <p>6 construct its proposed power line on a route that had</p> <p>7 the most support from the community, that had the least</p> <p>8 impact on the community. The route chosen clearly lacks</p> <p>9 support from citizens of La Grande and Union County. It</p> <p>10 simply is not something that we want to have here</p> <p>11 affecting our community in many ways.</p> <p>12 We are asking you to consider some of the</p> <p>13 impacts of this line on our community. We want you to</p> <p>14 consider, to think about the impact of construction</p> <p>15 traffic on our residential neighborhoods and the</p> <p>16 deterioration that it will cause to our streets and</p> <p>17 roads, and the danger that it would present to</p> <p>18 pedestrians walking in these neighborhoods, many of</p> <p>19 which don't even have sidewalks.</p> <p>20 We want you, please, to consider the negative</p> <p>21 impact of the project on our unique Morgan Lake Park.</p> <p>22 You have heard vivid testimony about what the impact of</p> <p>23 power transmission towers towering 40 feet above the</p> <p>24 forest canopy in Morgan Lake would cause to the</p> <p>25 viewshed, the solitude, the beauty of that area.</p>

My name is Sheri Kang. I reside at 331 S. West St. Yreka, Ca. in the Klamath National Forest in Siskiyou County, Ca. I am not a resident of La Grande but a visitor & tourist.

I have been a co-owner of a large Logging Company in that same forest for many years & also participated in fire suppression when needed.

I have also worked for the Happy Camp Ranger District of the Klamath NF & worked on active forest fires. I have flown over fires & seen the devastation to habitat & wildlife on those fires.

Living in Happy Camp when it was totally surrounded by wildfire the health of many residents were comprised.

In a Nov. 2018. Near Paradise, Ca. a fire started on the 5kV Caribou Palermo Electric Transmission line. This fire started near Paradise in Butte, CA. Later that day utility workers discovered that a part had separated from an arm on the tower which started this fire.

The Camp fire killed an estimated 85 people, destroyed 18,804 structures & burned 153,336 acres.

Cal Fire identified a second ignition site "The Second Fire" was determined to be vegetation into the electrical lines owned & operated also by PG&E this fire connected to the ^{first fire}.

Many families & friends I know that lived in Paradise lost their pets & livelihoods. How can this be recovered?

In addition to this fire PG&E recorded 1 billion dollars charge for liability from wildfire in 2017 alone

If you drive thru Calif on the I 5 corridor from the Oregon Border thru Northern Ca., you can visibly see the damages caused by Wildfires in many locations thru-out the North state.

Fires have increased as each year goes by & become larger & more devastation. Animal & plant habitat destroyed.

As a tourist & visitor from a State devastated by wildfires each & every year I can only say this area holds a serene untouched beauty. The landscape & wild life are stunning. The adverse conditions that will effect the life personally in the powerline zone could never be replaced.

In the past two days I have spent hours near the Morgan Lake area hiking on a friends large parcel of property. It's serene beauty would be directly impacted by the building of D&H. His home is within 150 yards of this line.

Ashley C. King

June 19, 2019

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 May 23, 2019.

Chair Beyeler and Members of the Council:

As a citizen of La Grande and Oregon, I have concerns about the proposed placement of the Idaho Power Boardman to Hemingway Project. My concerns are for the safety of myself, my family and the citizens of La Grande if this line is erected. My primary concern is the slope instability.

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 "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 area 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 Fern and others (2018). 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 a 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 geologist's warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics which employs hundreds of people and is a critical access hospital for this region. La Grande High School, Central Elementary, and our middle school are also positioned down from the proposed towers. At least 100 homes (mine included in these) are positioned down the slope of these 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 current proposal 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, this is UNACCEPTABLE. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande. This proposal should be REJECTED.

Sincerely,



Mark Karl
906 Third Street
La Grande, OR 97850

m_karl2@hotmail.com

August 11, 2019

Energy Facilities Sitting 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 May 23, 2019.

Chair Beyeler and Members of the Council:

As a citizen of La Grande and living less than 1/2 mile from some of these towers. I have grave concerns about the proposed placement of the Idaho Power Boardman to Hemingway Transmission Project. One of my concerns are the weeds.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city.

The Weed Plan, DPO-Attachment P 1-5: The applicant does not comply, as required, with Oregon statutes. OAR 345-025-0016 states "In the site certificate, the Council shall include conditions that address monitoring and mitigation to assure compliance with standards contained in OAR Chapter 35, Division 22 and Division 24."

Idaho Power claims no responsibility for weeds outside the right of way (ROW) or those present outside the project that are likely to spread, even though the weeds at the site would disperse to areas outside the ROW. There is no assurance that noxious weeds at the site would not be allowed to go to seed.

The current proposal for a Boardman to Hemingway electrical transmission line offers an unacceptable omission for these weed concerns. All of the routes proposed make our countryside a conduit with no benefit, and create an unacceptable risk to the lands around La Grande.

This proposal should be REJECTED.

Thank you for your time,



Mark Karl
906 Third Street
La Grande, OR 97850

June 19, 2019

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 May 23, 2019.

Chair Beyeler and Members of the Council:

As a citizen of La Grande and living less than 1/2 mile from some of these towers. I have grave concerns about the proposed placement of the Idaho Power Boardman to Hemingway Transmission Project. My main concern are for the safety of myself, my family and the citizens of La Grande, and patients that are at the hospital if this line is erected. Which is wildfire hazard.

Oregon is ranked 8th Most Wildfire Prone state in the United States according to Versick 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).

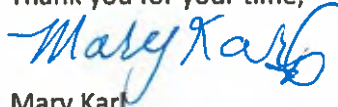
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (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 (my house) within the City three schools and the 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 the HOSPITAL in 10 minutes. This is frightening and an UNACCEPTABLE risks for our citizens.

The current proposal for a Boardman to Hemingway electrical transmission line 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.

Thank you for your time,



Mary Karl
906 Third Street
La Grande, OR 97850

m_karl2@hotmail.com

August 11, 2019

Energy Facilities Sitting 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 May 23, 2019.

Chair Beyeler and Members of the Council:

As a citizen of La Grande and living less than 1/2 mile from some of these towers. I have grave concerns about the proposed placement of the Idaho Power Boardman to Hemingway Transmission Project. One of my concerns are the weeds.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city.

The Weed Plan, DPO-Attachment P 1-5: The applicant does not comply, as required, with Oregon statutes. OAR 345-025-0016 states "In the site certificate, the Council shall include conditions that address monitoring and mitigation to assure compliance with standards contained in OAR Chapter 35, Division 22 and Division 24."

Idaho Power claims no responsibility for weeds outside the right of way (ROW) or those present outside the project that are likely to spread, even though the weeds at the site would disperse to areas outside the ROW. There is no assurance that noxious weeds at the site would not be allowed to go to seed.

The current proposal for a Boardman to Hemingway electrical transmission line offers an unacceptable omission for these weed concerns. All of the routes proposed make our countryside a conduit with no benefit, and create an unacceptable risk to the lands around La Grande.

This proposal should be REJECTED.

Thank you for your time,


Mary Karl
906 Third Street
La Grande, OR 97850

ESTERSON Sarah * ODOE

From: Megan Keating <megank495@gmail.com>
Sent: Wednesday, August 21, 2019 4:43 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.
Attachments: Keating Letter.docx

Please find attached my comment on the Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Sincerely,
Megan Keating

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. Specifically, I am protesting as a concerned citizen regarding the B2H Draft Proposed Order, the Final Environmental Impact Statement, and the project's plan regarding wild and threatened fish.

As a frequent visitor to La Grande, Oregon and the surrounding natural areas I am deeply concerned about the project's effect on wild and threatened fish. It is absolutely critical to protect these habitats.

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, 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,

Megan Keating
5922 SE Holgate Blvd
Portland, OR 97206
MeganK495@gmail.com
(508)-681-5921

August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

In summary:

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

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

Ursula Kelley DVM

Signature

Ursula Kelley DVM

Printed Name

Ronald B. Kelley, Ph.D.

Mailing Address:

402 Walnut St.

La Grande OR

97850

Ronald B. Kelley, Ph.D.

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 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: Ursula Kelley DVM and Ron Kelley PhD

Address: 402 Walnut Street, 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.

August 10, 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. Our neighborhood has experienced two episodes of flooding from these slopes in the last ten years after hard rains, and I am concerned that construction as planned will exacerbate slope instability.

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.

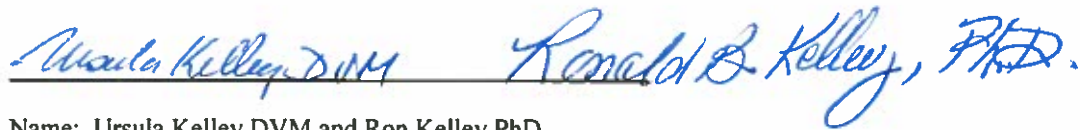
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

The image shows two handwritten signatures in blue ink. The first signature, on the left, is 'Ursula Kelley DVM' and the second, on the right, is 'Ronald D. Kelley, PhD'. Both signatures are written in a cursive style.

Name: Ursula Kelley DVM and Ron Kelley PhD

Address: 402 Walnut 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

Email: B2H.DPOComments@Oregon.gov

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 their 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 routes, 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 individuals whose remote properties and summer cabins would have been impacted 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. EFSC must deny the site certificate!

 
Signature

Name: Ursula Kelley DVM and Ron Kelley PhD

Address: 402 Walnut Street, 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

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. As a local veterinarian, I have met local ranchers and farmers, sportsmen, outdoor enthusiasts, Eastern Oregon University faculty, staff and students, and community members of all ages and occupations. All of us treasure Morgan Lake and the surrounding Blue Mountains for the beauty, wildlife, recreational opportunities, and the ability to escape to the peace, tranquility, and healing that undisturbed nature can provide.

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: Ursula Kelley DVM and Ron Kelley PhD

Address: 402 Walnut Street, 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: Ursula Kelley DVM

Mailing Address:
402 Walnut Street
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 KELLY

Mailing Address (mandatory) PO Box 2768
LA GRANDE OR 97850

Phone Number (optional) (541) 963-3950 Email Address (optional) brian@helbcan.org

Today's Date: 6-20-19

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

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

August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

In summary:

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

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

Please don't industrialize the country?

David L Kelly
Signature

Daniel L Kelly
Printed Name

Mailing Address: *61062 Stackland Rd*
Cove, OR 97824

Maureen Kelly
61062 Stackland Rd
Cove, OR 97824

RECEIVED
AUG 21 2019
Department of Energy

Kellen Tardæwether, Senior Sting Analyst
Oregon Department of Energy
550 Capitol St NE
Salem, OR
97301

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97301-374299

Kellen Tardaaewether, Senior Siting Analyst
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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.

Too many unanswered questions!!

Sincerely,

Maureen Kelly

Name: Maureen Kelly

Address: 61062 Stackland Rd
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, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

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

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

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

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

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

Sincerely,

Maureen K Kelly

Signature

Printed Name: Maureen K Kelly

Mailing Address: 61062 Stackland Rd
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, 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:

Maureen K Kelly

Mailing Address:

61062 Stackland Rd
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,


Signature

Maureen Kelly
Printed Name:

Mailing Address: 61062 Stackland Rd
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.

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 ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

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

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

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

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

In summary:

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

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

Maureen Kelly
Signature

Maureen Kelly
Printed Name

Mailing Address: 61062 Stackland Rd
Cove, OR 97824

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

RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

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

Dear Chair Beyeler and Members of the Council:

I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project, and I have three concerns to raise.

Cultural Considerations

Firstly, 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. 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. 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. Considering the points above, Idaho Power does not comply with the state standards for cultural resources or scenic resources¹.

Insufficient and Inaccurate Information about Morgan Lake

Secondly, Morgan Lake Park, analyzed as part of the Morgan Lake Alternative² and Summary of Impacts³, inaccurately describes features of the park itself and severely underestimates the permanent impact of development on this unique city park.⁴ Morgan Lake Park is an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities as per OAR 345-021-0010(1)(t)(A).⁵ Inaccuracies comprise of the following:

Page 62 (T-57) refers to "extensive work in the siting study of the Morgan Lake Alternative." That is doubtful because of the host of inaccurate information included in the study. Specific examples of unsupported conclusions include the following:

¹ OAR 354-022-0090, or 345-022-0080.

² Attachment T-3, Table T-2, p. T-3-2; Table T-3-1, p. T-13

³ pp. T-27-28, 43, (T-4-51-56)

⁴ See OAR 345-021-0010 (1) (T) (A) (B) (D) & OAR 345-022-0100.

⁵ Attachment T-3, Table T-3-1 (p. T-13)

- 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 wildlife and bird sanctuary, home to nesting bald eagles. In their application, Idaho Power omits any references to Twin Lake.
- Page 156, (T-4-6): This is claimed 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.
- 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..." This is an unsupported claim.
- Page 146 (T-4-47): "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape." This is an unsupported claim.
- 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] ..."

Environmental Concerns

Lastly, the developer did not do current surveys for wildlife to provide the necessary evidence to show he was compliant with OAR 345-022- 0060, but also did not use easily accessible studies completed by and for ODFW during the compilation of information for issuing a site certificate. The nest surveys completed for the Antelope Ridge Wind development in Union County, which was planned to be sited adjacent to this proposed transmission line found 75 different bird species nesting in the forested areas. The numbers of nesting birds were so high that the US Fish and Wildlife Service recommended no development in the forested areas. The Baseline Noise Surveys describe the route of the transmission line to be adjacent to the 230 KV line which is adjacent to the Elkhorn Wind Development. For this reason, the wildlife information and studies completed as a result of the Elkhorn and Antelope Ridge Wind Developments are relevant to and should be analyzed in terms of providing some baseline information to compare with current surveys. Recommendations and concerns documented in comments regarding these two developments are directly related to the area of impact of this transmission line.

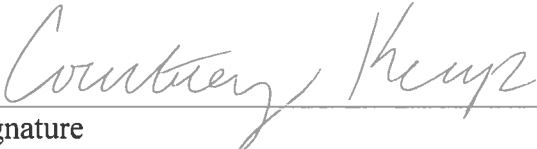
Additionally, the creation of a corridor through the middle of forest land is stated as a benefit to wildlife. There are multiple studies showing the negative impacts of creating corridors such as this as it provides opportunities for raptors and other predators to access prey. This should be widely known by the developers given the concerns they are required to address to attempt to minimize the use of transmission structures by raptors and other birds.

The entire section on Forested Land Analysis needs to be rewritten to accurately reflect the true impacts of this development including negative impacts to adjacent land and adjacent landowners such as impacts from the use of chemicals to control vegetation, erosion from development of the transmission line and roads, transmission lines are identified in multiple studies as a primary source of invasive weeds and it appears from this section that the developer plans to only spray for weeds once a year. That will assure that there will be multiple problems with invasive weeds as a result of this transmission line.

I am also concerned regarding the number of nests that will be destroyed by this transmission line as well as the lack of completed work indicating a commitment to identifying, addressing and mitigating for the wildlife impacts this development will have. The area mentioned above, in Union County, is known to serve as an important location for federally protected migratory birds. While the Oregon Department of Energy can legally refuse to address federally protected species under the threatened and endangered species rules, they are required to address them in the habitat mitigation rules. The developer has made literally no effort to identify and protect federally protected species under OAR 345-022-0060 or 0070. This is not an optional activity according to the opinion received from the Oregon Legislative Council.

Recommendation

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:

Courtney Kemp

Mailing Address:

62361 Lettel Rd
La Grande, OR 97850

Phone Number:

(541) 910-0259

E-mail:

j.kemp.courtney@gmail.com

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,

Victoria Kerr

Name: Victoria Kerr

Address: 94 3rd 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,

Victoria Kerr

Name: Victoria Kerr

Address: 94 3rd 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

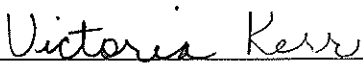
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The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment 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: Victoria Kerr
Mailing Address: 94 3rd St.
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,

Victoria Kerr
Signature

Victoria Kerr
Printed Name:

Mailing Address: 94 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.

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 ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

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

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

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

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

In summary:

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

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

Victoria Kerr

Signature

Victoria Kerr

Printed Name

Mailing Address:

94 3rd 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 ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

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

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

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

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

Sincerely,

Victoria Kerr
Signature

Printed Name: Victoria Kerr

Mailing Address: 94 3rd St.
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

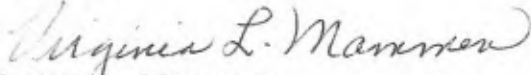
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,


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

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

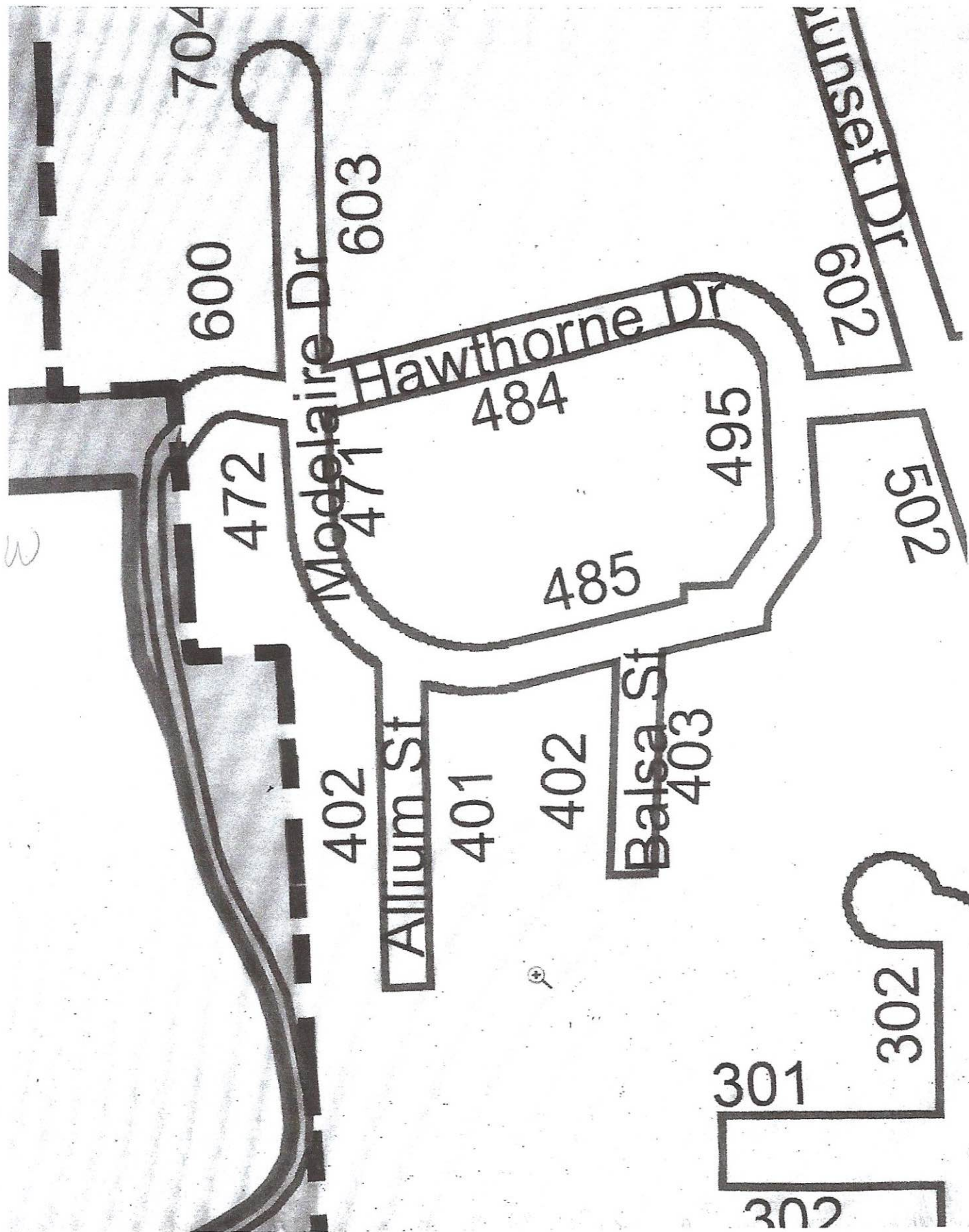
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

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

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

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

N



Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



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

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

IV. CONCLUSIONS

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

V. ORDER AND CONDITIONS OF APPROVAL

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

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

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

Kyle Carpenter <KCarpenter@cityoflagrande.org>
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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.

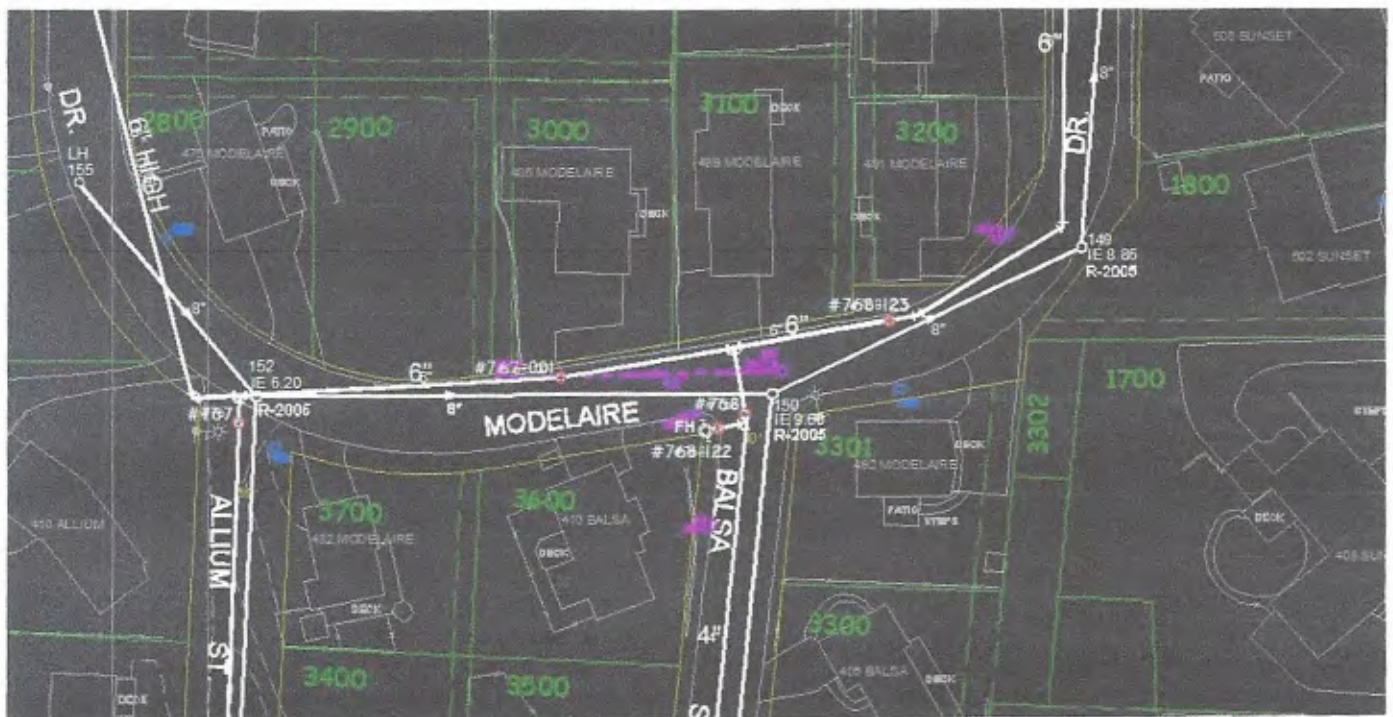
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2 attachments



Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

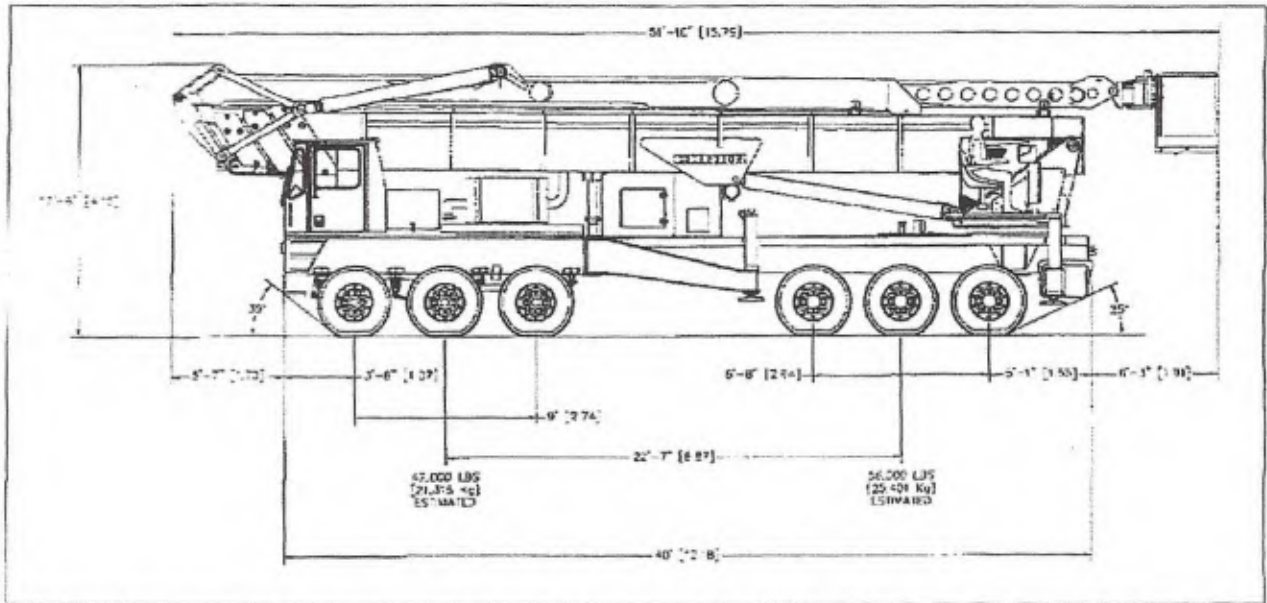


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

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

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

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

3.1.3 Traffic Related to Timber Removal

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

3.1.4 Impacts to V/C Ratios

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

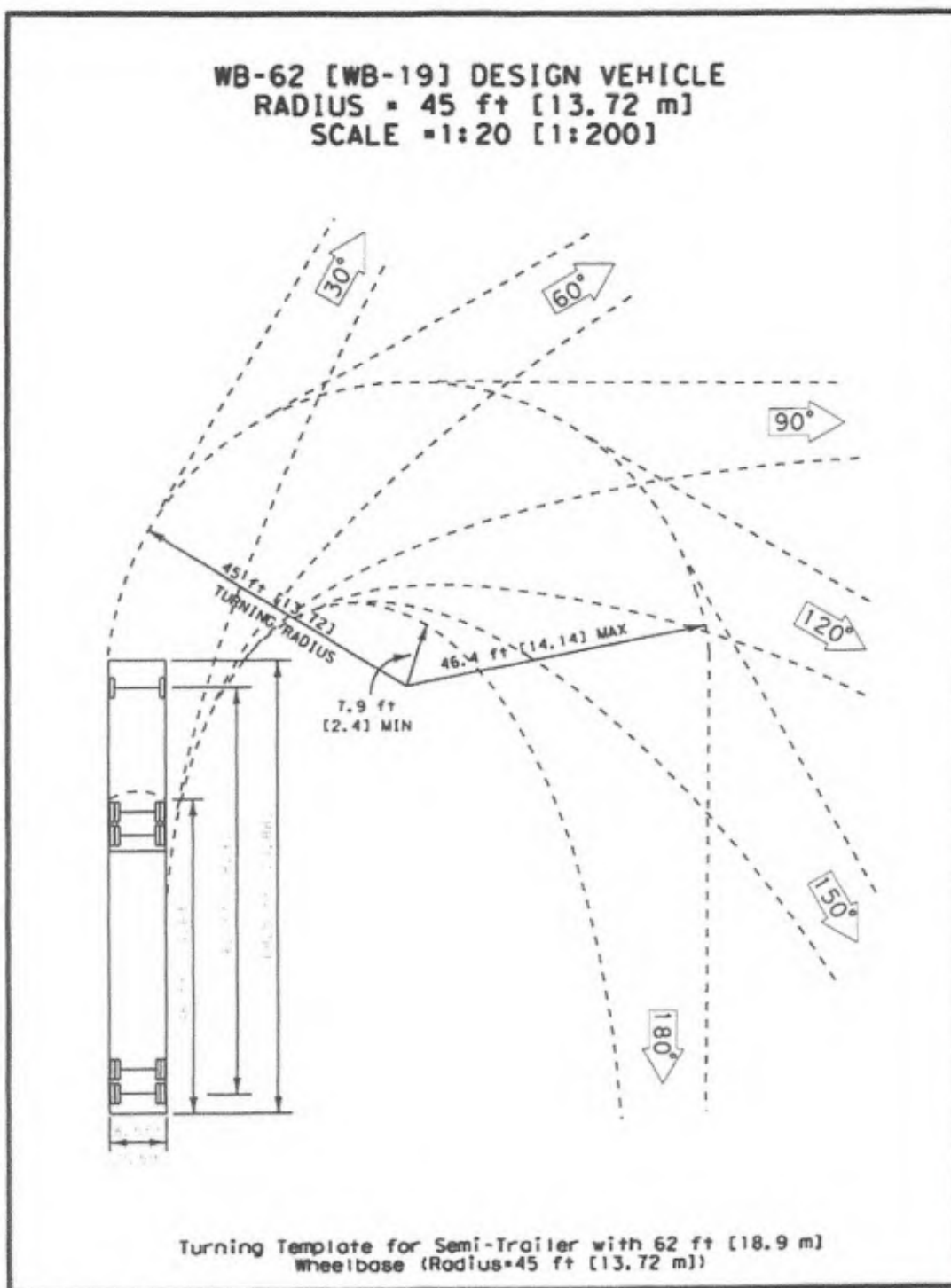
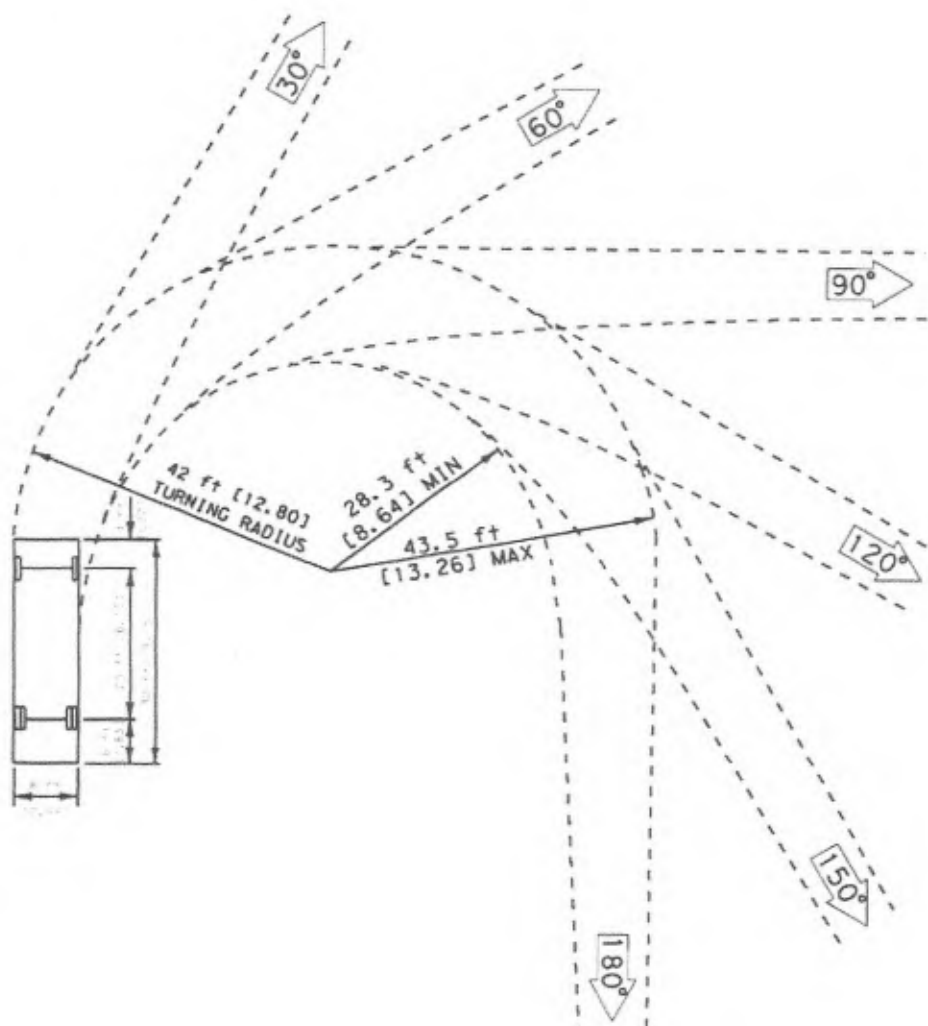


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

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



Turning Template for Single Unit Trucks or Buses

Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

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

Section 3. DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

Section 17. TRUCK ROUTES

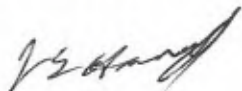
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

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

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

SIGNATURE



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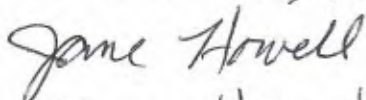
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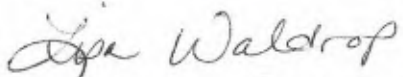
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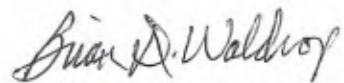
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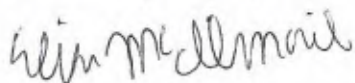
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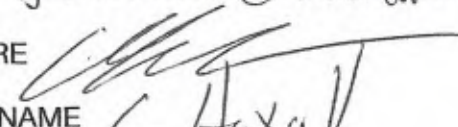

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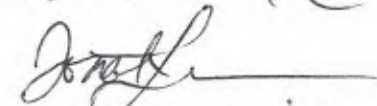

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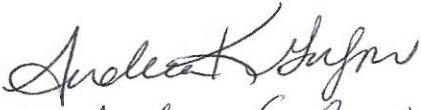
John Barutz


ADDRESS


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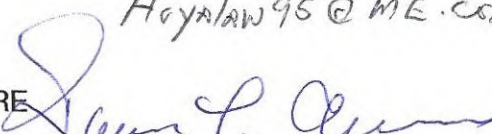
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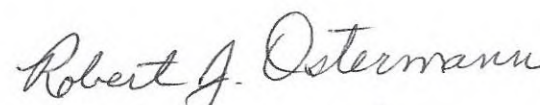

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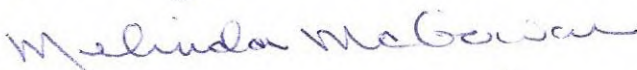
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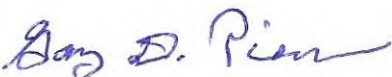
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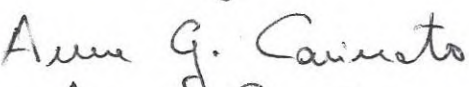
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ADDRESS
EMAIL

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

SIGNATURE *Merle E. Comfort*
PRINTED NAME MERLE E. COMFORT
ADDRESS 209 SCORPIO DRIVE LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL r-maille@icloud.com

SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C Kevan*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekeler Ln - La Grande, OR
EMAIL carolsummers1938@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 4th St. LaGrande - OR 97850
EMAIL

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

SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande, PR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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PRINTED NAME
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EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

From: Robert Kleng <rkleng@eou.edu>
Sent: Sunday, August 18, 2019 2:43 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] please consider B2H alternatives

Please see attached:



b2h

August 15, 2019

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

Dear Chair Beyeler and Members of the Council:

I live on SUnset Drive on the way to MOrgan Lake Road. At least once a week for the past 40 years, almost daily in the summer, I have walked the east side trail at Morgan Lake. I know the park well, and I especially cherish the absolute silence of this secluded natural area. During the past 40 years, the tranquility of the park has not changed.

I have studied DPO Attachment X-4, pp. 3/5 & 4/5. From my understanding of this attachment, every location in the Morgan Lake area which would be crossed by the B2H Morgan Lake Alternate Route was monitored with the same noise sensitive receptor (NSR) at milepost 11. The map below from Exhibit X, Attachment X-6 shows the skewed and poor modeling done for noise in Union County. This single NSR would provide exactly -- and unrealistically -- the same reading for the Husky Truck Stop, where heavy freight trucks from adjacent I-84 stop for gas and park for the night with diesel engines rumbling, and Morgan Lake Park, several miles to the west at the top of a relatively isolated two lane county road.

At Morgan Lake Park, the camp host closes the gate each night at 10:00 to ensure quiet. Visitors often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, no generators or shooting is allowed, and no motorized craft are permitted on the lake. Even when the campground is full, it's possible to picnic, fish, hike or camp while enjoying the absolute silence of the surroundings. The Morgan Lake Park Recreational and Development Plan even cautions against loud voices that might disturb park visitors:

2. Breaching the public Peace. No person in Morgan Lake Park shall engage in abusive, insulting ... language or engage in any disorderly conduct or behavior tending to breach the public peace. Park visitors shall conduct themselves in a quiet and peaceful manner consistent with the natural atmosphere in which the park is set. (25/33)

I am profoundly concerned that the applicant has failed to include noise monitoring at Morgan Lake Park campground, a noise sensitive property within ½ mile of the development as required by OAR-340-035-0015(38). Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries."

Morgan Lake Park, an overnight campground, is unquestionably a place where people expect to sleep, and furthermore, to sleep undisturbed. Eight towers supporting buzzing, popping, snapping transmission lines will circle the campground; the closest being .32 and .38 miles; the furthest one mile. I see no opportunity for mitigation in this case.

Division 22

GENERAL STANDARDS FOR SITING FACILITIES

Energy Facility Siting Council - Chapter 345

345-022-0100

Recreation

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:

(a) Any special designation or management of the location:

See the Morgan Lake Recreational Use and Development Plan (above), and ASC p. 145 (T-4-46): Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users."

(b) The degree of demand:

From the City of La Grande's current web site: Morgan Lake: Atop a mountain just a few minutes' driving time from the heart of the city, Morgan Lake offers a quiet, motor-free respite from daily cares, with camping, fishing and hiking opportunities. ... Morgan Lake is located just a few miles outside of La Grande and provides the citizens of Union County an inexpensive, easily accessible area for a broad range of outdoor recreational activities, including fishing, camping and nature hikes.

City records show that in summer, an average of 200 vehicles use the Morgan Lake Road daily. Camping has become so popular that new campsites were added in 2017 (now total of 12) and the overnight limit decreased from 7 nights to 3 nights. Campers are often turned away.

(c) Outstanding or unusual qualities:

c) A free 204 acre park with two natural lakes, located at the top of the hills within a 10-15 minute drive of 13,000 city residents is definitely unusual. Because it is often 10 degrees cooler than the town below, it is a welcome respite from summer heat.

(d) Availability or rareness:

See (c) above, and "Morgan Lake Park is an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities" per OAR 345-021-0010(1)(t)(A) Attachment T-3, Table T-3-1 (p. T-13).

(e) Irreplaceability or irretrievability of the opportunity.

Applicant rates Morgan Lake Park as “somewhat irreplaceable,” a curious designation. “Irreplaceable” is an absolute: synonyms are “unique, unrepeatable, incomparable, unparalleled, priceless, invaluable.” Irreplaceability, like pregnancy, is either/or, not “somewhat.” There is no question that Morgan Lake Park is irreplaceable.

Despite all of the information listed above which clearly indicates that Morgan Lake Park is an “important recreational opportunity,” applicant’s conclusion is that the “impact on recreation” of multiple towers supporting buzzing, popping, snapping transmission lines, some within .3 miles of Morgan Lake Park’s overnight camping area, will be “less than significant.” Commission should not allow applicant to leap to spurious self-serving conclusions when the preponderance of evidence indicates the contrary.

When organized La Grande opposition made applicant’s proposed Mill Creek Route seem untenable, applicant offered the city of La Grande \$100,000 mitigation if they would support the Morgan Lake Alternate Route. At a La Grande City Council meeting, the Park Department Director, Stu Spence, was asked what he could use that money for. He could only suggest “perhaps an additional restroom or more porta potties.” Clearly this is a park that does not need mitigation for development, quite the contrary. It should be protected from intrusions. Development, as the park plan indicates, should be minimal.

Mitigation for an industrial intrusion into the silence of a natural park setting is not possible. To preserve this rare and beautiful natural recreational opportunity, it is essential that EFSC deny approval of B2H construction on the Morgan Lake Alternate Route. This alternate route was proposed in case the Mill Creek Route, which poses many serious potential problems as well – including geologic and fire hazards, unacceptable impacts on local residences, the Oregon Trail, and natural resources among many others – was not approved.

The Commission should not be constrained by the false choice of applicant’s chosen routes. In the unlikely event that the B2H is needed, the BLM Environmentally Preferred Route would avoid virtually all of the impacts of the Mill Creek and Morgan Lake routes.

I urge the Commission to deny both of applicant’s routes until, at a minimum, there is a Supplementary Environmental Impact Study (SEIS) of applicant’s proposed routes.

Robert Kleng

304 Sunset Drive
La Grande OR 97850

TARDAEWETHER Kellen * ODOE

From: B2H DPOComments * ODOE
Sent: Tuesday, July 9, 2019 3:14 PM
To: 'Midge.A.Kline@andeavor.com'
Subject: RE: Boardman to Hemingway Public Hearings

Hello Midge,

The notice is for comments on the draft proposed order (DPO) and application for site certificate for the facility proposed by Idaho Power. The public hearings were an opportunity for members of the public and other agencies to provide testimony to Energy Facility Siting Council members. However, the comment period on the DPO is still open for the Department to receive written comments on the record for the proposed facility.

Written comments may be submitted prior to August 22, 2019 at 5 p.m. by hand-delivery, email, mail, or fax to the hearing officer, in care of:

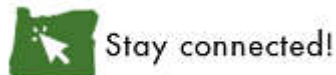
Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301
Fax: 503-378-6457
B2H.DPOComments@Oregon.gov

Hope this helps,

Kellen



Kellen Tardaewether
Senior Siting Analyst
550 Capitol St. NE Salem, OR 97301
P: 503-373-0214
C: 503-586-6651
P (In Oregon): 800-221-8035



From: Kline, Midge <Midge.A.Kline@andeavor.com>
Sent: Tuesday, July 9, 2019 1:45 PM
To: B2H DPOComments * ODOE <B2H.DPOComments@oregon.gov>
Subject: Boardman to Hemingway Public Hearings

Mr. Tardaewether,

Andeavor operate a petroleum pipeline system that begins at our refinery in Salt Lake City, Utah runs through Idaho, Oregon and end ends in Spokane, WA. We received notice about the upcoming public hearing for the Draft Proposed Order for the Boardman to Hemingway Transmission Line Project. It appears there will be areas that the project will cross over the pipeline and/or the pipeline right of way. Of course we would like to review and provide comments on the design and construction phases of the project to ensure optimal safety of the pipeline. However, if I understand correctly, this round of public hearings is not for that purpose. Please verify.

Thank you--

Midge Kline, SR/WA, R/W-NAC
Adv Right-of-Way Specialist



Northwest Products System
201 N. Phillippi Street
Boise, Idaho 83706
O: 208-373-2141 C: 208-869-9429
Midge.A.Kline@andeavor.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

Charles Koehler

Printed Name:

Mailing Address:

1502 Z 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.

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 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 L_{DEN} 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: Charles Koehler

Mailing Address:

1502 Z Ave
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 1/4 mile of blasting site.

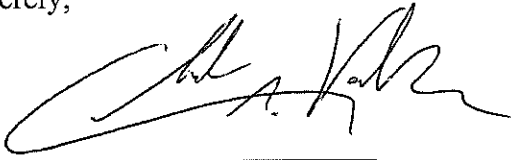
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire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

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

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Koehler", written over a horizontal line.

Name: Charles Koehler

Address: 1502 Z. Ave
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

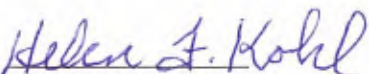
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous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

Mailing address: 1902 3rd Street 103
Salem, Or. 97850

Email address:

phone number: (optional) 541-573-2959

ESTERSON Sarah * ODOE

From: Dave Komlosi <djkomlosi@gmail.com>
Sent: Thursday, August 22, 2019 4:37 PM
To: B2H DPOComments * ODOE
Subject: B2H Comment
Attachments: Komlosi_Comment_2019.docx

[Find attachment](#)

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
B2H.DPOComments@Oregon.gov

Subject: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/2018; Draft Proposed Order dated 5/22/2019

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: "(KCI)s are large-scale conservation issues or threats that affect or potentially affect many species and habitats over large landscapes throughout the state."

Despite being a Key Conservation Issue, the Oregon Conservation Strategy and its Goals, are not mentioned in IPC's Application at all! Consider Land Use Planning Goal 1: *Manage land use changes to conserve farm, forest, and range lands, open spaces, natural or scenic recreation areas, and fish and wildlife habitats.* Neither the current Proposed Route nor Morgan Lake Alternative of IPC's Application to EFSC takes these into account! Even if we ignore the fact that the B2H Project likely is not needed at all, given lowered demand and improved technology of energy storage batteries—IPC intends to disregard the "Proposed Route" considered in the BLM/USFS Records of Decision. That "Proposed Route" was chosen by the agencies as being the least harmful to the greatest list of resources—yet IPC has abandoned that in favor of two other routes imminently MORE harmful and despised by MOST residents of Union County. Is Goal 1 being met when the B2H line goes less than 100 feet from Twin Lake, a gem of a wetland that deserves protection? Is Goal 1 being met when B2H goes through Rice Glass Hill property, proposed as a State Natural Area? Is Goal 1 being met when noxious weeds are spread by B2H through Union County's finest wet meadows and elk wintering habitat?

Another very obvious lack is IPC's failure to discuss Strategy Habitats, outlined in Oregon's Conservation Strategy: <http://oregonconservationstrategy.org/strategy-habitats/strategy-habitats-summary-by-ecoregion/>.

In Union County alone, the Strategy Habitats of Grasslands, Late Successional Mixed Conifer Forest, and Ponderosa Pine Woodlands would very obviously be impacted by B2H as proposed in the Application.

The Application also neglects to address Strategy Species under OCS *“The Conservation Strategy identifies 294 Strategy Species, which are Oregon’s “Species of Greatest Conservation Need”. Strategy Species are defined as having small or declining populations, are at-risk, and/or are of management concern. “This is completely unacceptable! How can an action set to devastate so many of Northeast Oregon’s Strategy Habitats and Species not even respond to our State Conservation Strategy?”*

Moving on to invasives, IPC’s “Noxious Weed Plan” is greatly lacking. As noted above, it is a threat to Oregon’s native plant communities. Oregon’s Conservation Strategy states *“Invasive non-native species can have many negative consequences throughout Oregon. Depending on the species and location, invasive plants can:*

- *affect food chain dynamics*
- *change habitat composition*
- *increase wildfire risk*
- *reduce productivity of commercial forestlands, farmlands, and rangelands*
- *modify soil chemistry*
- *accelerate soil erosion*
- *reduce water quality”*

Chapter 569 of Oregon law covers weeds. Oregon statute 569.180 (Noxious weeds as public nuisance policy) states, “In recognition of the imminent and continuous threat to natural resources...noxious weeds are declared to be a public nuisance and shall be detected, controlled and, where feasible, eradicated on all lands in this state.”

Upon careful reading, “Noxious Weed Plan” breaks the law by exempting IPC from weed control after 5 years, denying responsibility for Class B and C Weed species (the vast majority of weeds), and holding IPC accountable for only the very limited area of ROW, despite the B2H project introducing and spreading weeds far and wide along a 300 mile stretch plus dozens of additional access roads and tensioning areas.

In summary, IPC’s Application does not take into account the Oregon Conservation Strategy. The Application clearly is breaks Goal 1 of the Strategy in many ways 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,

Dave Komlosi
906 Penn Ave
La Grande OR 97850
djkomlosi@gmail.com



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) Fuji Kreider

Mailing Address (mandatory) 603 66 Marvin Rd.

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

Today's Date: 6/26

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

Written comments can also be submitted today. no

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 42</p> <p>1 You have heard many in eastern Oregon counties 2 speak to this personally what the effects would be on 3 them. For example, a tower being built where a house 4 currently stands. I grew up on a farm in the Red River 5 Valley of Minnesota, flatland with rich soil. In the 6 late '60s I had moved away by then. The freeway began 7 to be built in the area. It cut through my parents' 8 half section, leaving a 40-acre triangle on one side of 9 the freeway and the majority of acres in a triangle on 10 the other.</p> <p>11 This ultimately resulted in a 4-mile drive 12 each way, often with farm equipment to get to the 13 smaller acreage, thus adding more time and cost, as well 14 as inconvenience of farming this smaller section. The 15 same applied to farming triangles; more costs, more 16 time, being much less efficient than farming a 17 rectangle.</p> <p>18 In Minnesota we get rain; and, therefore, we 19 have deep and wide ditches. The freeway construction 20 screwed up the drainage system which wasn't fixed until 21 1996, when my mother had to pay \$90 an acre to have it 22 done. There was no governmental compensation for any of 23 these added expenses which exist still today.</p> <p>24 From the time my parents knew their land was 25 going to be taken, until many years later, my mother was</p>	<p style="text-align: right;">Page 44</p> <p>1 compensating for these costs, many of which cannot be 2 paid for with money.</p> <p>3 Most landowners would also not have the 4 resources to sue for damages; farming and ranching, 5 usually not being lucrative operations.</p> <p>6 I have heard the Grande Ronde Valley is the 7 largest circular valley in the US. Please help us keep 8 its natural beauty and not discard it with the ugly 9 monstrosities Idaho Power wants to erect in this very 10 scenic area. There are other options if indeed this 11 line has to be built at all.</p> <p>12 There are strong reasons for building 13 microgrids or none at all, but that is a different 14 chapter.</p> <p>15 With all the testimonies you have heard, you 16 must have a strong sense of the devastating impact this 17 power line would have on the natural lands and all the 18 critters, including humans, who would be affected should 19 it be built as Idaho Power wishes.</p> <p>20 I conclude with these questions: Does Idaho 21 Power have the right to determine the negative impacts 22 on our environment and our personal lives? Do we the 23 people not matter? Please hear us.</p> <p>24 And I also request that the deadline be 25 extended because summer is a very busy time for many</p>
<p style="text-align: right;">Page 43</p> <p>1 upset and often angry about it. And this, of course, 2 affected those around her. The inconvenience, the extra 3 costs, the constant noise, the pollution caused by the 4 diesel vehicles all contributed to this.</p> <p>5 When Mom moved to town, my nephew moved to the 6 farm, and although he planted even more rows of trees 7 than what already existed in an attempt to block the 8 freeway noise, it bothered him and he eventually moved.</p> <p>9 Yesterday I asked a local counselor if she was 10 seeing more people who were depressed or angry due to 11 this proposed B2H line. She said, Yes, whenever there 12 were additional stresses that caused people to feel 13 helpless, her business increased. It wasn't something 14 she wanted.</p> <p>15 Our property is adjacent to the freeway near 16 Ladd Canyon. We look out on the foothills. I drive 17 Foothill home whenever possible. The beauty relaxes me 18 and is a type of medication. Should the power line be 19 constructed along there, and especially along the 20 Miracle Mile, the scenic value would be ruined.</p> <p>21 These costs, emotional, personal hurt, 22 stress-related health issues, inconveniences, extra 23 work, immediate and ongoing expenses, as well as 24 long-term effects we can't yet know add up. They take a 25 toll on us, the citizens. Idaho Power will not be</p>	<p style="text-align: right;">Page 45</p> <p>1 people along this route. Thank you.</p> <p>2 HEARING OFFICER WEBSTER: Thank you.</p> <p>3 I have received an additional comment request 4 So we'll hear from Fuji Kreider.</p> <p>5 MS. FUJI KREIDER: Good evening. Fuji 6 Kreider, 60366 Marvin Road, La Grande.</p> <p>7 I really did not plan on continue speaking 8 tonight, but I didn't realize that you might be actually 9 contemplating extending the comment period. So I 10 thought, I have to talk about this.</p> <p>11 Margaret mentions the stress and all that is 12 going on. It's been very intense. It isn't just within 13 our group and these hearings of late, it's been going on 14 for quite some time. But I wanted to focus on the 15 media, which is since last week you all heard everyone 16 speaking very passionately about what's going on. The 17 phone, emails, everything has been nonstop, over the 18 top. People are so confused about where even to find 19 the table of contents, how to navigate the draft 20 proposed order, the application, et cetera.</p> <p>21 Back when you had the informational meetings 22 last November, I asked Kellen and the staff that were 23 there, How long will it be for the comment period? 24 Kellen said, How long do you need? I said, We need at 25 last 6 months. You guys have had way longer than that.</p>

<p style="text-align: right;">Page 46</p> <p>1 And we are just citizens, we don't have a staff, 2 et cetera. 3 Everybody kind of chuckled, and then it was 4 more like, Well, we have to give you at least 30 days, 5 but probably 45, maybe even 60 if we are lucky. So we 6 got lucky and got 60 days. I'm telling you it's not 7 enough. We are really finding it difficult to navigate 8 not just the application and the DPO and your standards 9 and that crosswalk between those, but then also you have 10 errata sheets, you have attachments, attachments that 11 don't have page numbers. It goes on and on. 12 And it's really kind of crazy making. So I 13 would encourage you tonight, this is my main message, to 14 extend the comment period, if possible. 15 Like I said, we originally asked for 6 months 16 initially. We'll take whatever we can get. Irene just 17 proposed another 6 months -- I mean another month, 30 18 days. That at a minimum, that would be fantastic. But 19 even if you could take it to the fall, would be great 20 because of all the farmers and the people that all 21 summer are having difficulty engaging with this. 22 And then my second request, it's kind of 23 related to time frame, but it comes after the fact, and 24 that is that I understand after the comment period is 25 over, then the staff will go through comments and give</p>	<p style="text-align: right;">Page 48</p> <p>1 I also had not planned to speak tonight, but I 2 think there is one thing that hasn't been brought up 3 that I would like to bring up, and that is a 4 neighborhood. And that is my neighborhood that is being 5 considered as using the route for the staging and for 6 the transportation of equipment to the site that they 7 are planning to use. 8 This is a loop that goes from a main artery up 9 around the hill. It's strictly a residential area. 10 It's a narrow, rather steep road on both sides of the 11 loop, and at either end there is a short stub that would 12 take them either to -- at the bottom -- either to the 13 main artery or up to the site, which the stub on that 14 one right now is just a gravel road. I also live about 15 a block from the hospital. 16 Our neighborhood is a quiet neighborhood, and 17 I'm concerned about the beauty and I'm concerned about 18 all of the wild animals that we have in our yard, we do 19 live in the city, and the effect that it would have on 20 them. But I'm also very concerned about the people in 21 our neighborhood. 22 And here again, it's been mentioned, a lot of 23 people are just overwhelmed. Either they really don't 24 understand what is going to happen and they think 25 somebody else is going to take care of it, or they don't</p>
<p style="text-align: right;">Page 47</p> <p>1 you guys, EFSC Council, a summary. I'm not sure what 2 those things are called. And you would use something 3 like that at a Council meeting. 4 And my request is that you have that Council 5 meeting back over here on the east side. As a matter of 6 fact, would be best to put it in La Grande. One, 7 because you can tell by the attendance you are getting 8 at these other meetings that that is where you have the 9 most passion, the people do. Not you, but the people 10 do. But even moreover, it's halfway. So it's 2 hours 11 from La Grande to Boardman, 2 hours from La Grande to 12 Ontario. It's right in the middle of these five 13 counties. And I really encourage you to consider having 14 that public meeting right where the heart of this is. 15 So that is all I have to say for tonight. You 16 know you'll get my written comments eventually in 17 writing with the appropriate standards and specificity. 18 Thank you. 19 HEARING OFFICER WEBSTER: Thank you, 20 Ms. Kreider. 21 It looks like I have some additional comment 22 cards coming. 23 Let's hear from Virginia Mammen. 24 MS. VIRGINIA MAMMEN: I'm Virginia Mammen. I 25 live at 405 Balsa, La Grande, Oregon.</p>	<p style="text-align: right;">Page 49</p> <p>1 have any idea how to read and meet all of the standards 2 that are required for writing. But they are concerned. 3 And our loop, as I say, it has about 40 houses 4 on it. There are a lot of children. There are no 5 sidewalks. It's just a quiet neighborhood. We all know 6 each other. We look out for each other. There are 7 several blind curves the children go up and down the 8 road to go to school. They walk their dogs. A lot of 9 people walk the hill because it's a good exercise area. 10 So having large trucks -- and we understand 11 from one of the landowners that was contacted -- we were 12 not contacted, and yet we are very, very close to the 13 site entrance. He was contacted and told there might be 14 upwards to 150 or more trucks a day that might be coming 15 up that hill during the beginning and during the process 16 time. 17 We don't have very many cars on our street. 18 It's just the houses that are there that are using it. 19 And even 25 big trucks would make a big difference. But 20 if you go even -- in fact, having a moving van or a 21 truck for even one day causes some restriction of the 22 use of it because it makes it very definitely a one-way 23 kind of a -- you can't have a two-way street, you can't 24 pass very easily. 25 We have noticed, just my husband and I, we</p>

<p style="text-align: right;">Page 50</p> <p>1 were coming along the main artery today that comes past 2 the hospital and then comes to the entrance to our loop, 3 and we were turning onto the main artery from another 4 street, and a very, very large dump truck was wanting to 5 turn onto the street we were turning off of. We had to 6 really get out of the way and move and go a different 7 direction so that truck could get to where it wanted to 8 go. 9 Then as we turned onto our street -- and I've 10 noticed this quite often. Turning onto it, you take up 11 a good part of the street to get around the corner, and 12 then you go a short distance and do the same thing 13 around another corner. And those are rather blind 14 corners that you are going around. Having dump trucks 15 going on the streets that are meant for just local 16 traffic is not going to be at all pleasant for any of 17 us. 18 And so the other business -- also knowing that 19 it's not going to be good for the hospital. We have a 20 helicopter that comes into our hospital, and it comes in 21 at various times. We are all pretty used to that, 22 except it does make a lot of noise and it does bother 23 some people more than others. If they are going to be 24 transporting by helicopter over our houses, this is 25 going to be just dreadful. We don't know really what's</p>	<p style="text-align: right;">Page 52</p> <p>1 (Recess taken.) 2 HEARING OFFICER WEBSTER: Let's reconvene, 3 it's 6 minutes after 6:00. The first order of business 4 is just to confirm that Council Member Mary Winters -- 5 is she still on the line? 6 COUNCILLOR WINTERS: Yes, I'm still on the 7 line. 8 HEARING OFFICER WEBSTER: All right. Great. 9 I think you'll want to participate in the decision that 10 Council has before it, the request Council has before 11 it. 12 Before we get to that though, does the Council 13 have any questions for the applicant tonight? 14 MS. TARDAEWETHER: It looks like we have 15 another comment. 16 HEARING OFFICER WEBSTER: I have received one 17 more comment card. So before you answer that question 18 and the other question that was presented to you 19 earlier, let's hear from Cynthia Harvey. 20 MS. CYNTHIA HARVEY: Hello. My name is 21 Cynthia Harvey. My residence address is 77647 North 22 Loop Road, Stanfield, Oregon. 23 In March of this year we purchased 1100 acres 24 up in the Meacham area of timberland. As of today we 25 have never received notice from the State of Oregon or</p>
<p style="text-align: right;">Page 51</p> <p>1 going to happen. A lot of people say, Oh, they won't do 2 that. I'm at a point where I don't trust anybody unless 3 I see it in writing they won't do certain things. 4 And so this is why I wanted to speak to you. 5 I know this is not meeting your standards, but there are 6 some things that don't have a written standard. It's 7 just common decency and not being bullied by somebody 8 who wants to have something that you have and they take 9 it away from you, and that is our peace and quiet. 10 Thank you. 11 HEARING OFFICER WEBSTER: Thank you. 12 All right. Let me circle back. Is there 13 anybody on the phone that wants to give comment? Is 14 there anybody on the phone that would like to give 15 comment? 16 Hearing none, I am thinking that we'll take a 17 break. We'll take about 15 minutes or so, and then 18 we'll reconvene so that Council can consider the 19 request. And in the meantime if there is anybody who 20 hasn't filled out a comment card that wants to give a 21 comment, please do so on the break, and when we come 22 back and reconvene, we'll give you the opportunity to 23 comment. 24 It is 5:49 now, and let's plan on coming back 25 about 5 after 6:00.</p>	<p style="text-align: right;">Page 53</p> <p>1 Idaho Power about this project. We have gone online, 2 and according to the map, they want to put five towers 3 on us. So we would be impacted greatly. It would take 4 all our stands of timber, all our best water resources, 5 and basically just destroy our property. 6 So I am concerned that we have never received 7 any kind of notice. So I want that stated in the 8 record. 9 HEARING OFFICER WEBSTER: When did you 10 purchase the property? 11 MS. CYNTHIA HARVEY: March. 12 HEARING OFFICER WEBSTER: Of 2019? 13 MS. CYNTHIA HARVEY: This year. 14 HEARING OFFICER WEBSTER: Any other things you 15 wanted to bring up tonight, any other issues? 16 MS. CYNTHIA HARVEY: Well, we have a lot of 17 issues, but I think the main one is the lack of 18 notification. 19 HEARING OFFICER WEBSTER: Thank you. 20 Is there anybody else, any public comment? 21 Going once, going twice, for now. 22 Council, questions we have for the applicant? 23 VICE CHAIRMAN JENKINS: I do. 24 HEARING OFFICER WEBSTER: Let's bring up 25 Mr. Stokes then.</p>



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Mailing Address (mandatory) 60366 Marvin Rd.
La Grande, OR.

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

Today's Date: _____

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Written Testimony

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<p style="text-align: right;">Page 66</p> <p>1 between here and La Grande? What do you think that's 2 going to look like out in that cow pasture? Are the 3 cows going to be happy? No. They aren't happy now when 4 it gets hot or it snows. I'm not happy when it gets hot 5 and it snows. There's a lot that needs to be said and 6 done here. 7 Now, Idaho could rectify this by putting in a 8 natural gas plant. It's expensive but they're close to 9 Wyoming, and there's lots of natural gas there. And 10 Wyoming is not that pretty of a state. I've been there 11 many times, I used to drive long haul from Boise to 12 Chicago twice a week. Lots of open area from Blackfoot 13 to Sinclair. They have the big towers, they have the 14 natural gas. There's a natural gas pipeline that runs 15 to the West Coast. Put it in, extend it. 16 Don't put the towers through this valley 17 because we're going to stop you. And I like to talk a 18 lot. I have nothing to lose. Shoot, I've been camping 19 for a day and look at this, I still look good. 20 So come on, really, we need to think about 21 this. We need to get together, inform the people, 22 there's got to be a solution. I know this needs to 23 happen. We need to get eastern Oregon bigger, we need 24 to help Idaho. I get that. But we cannot do it running 25 down 84 where everyone sees. We cannot do that.</p>	<p style="text-align: right;">Page 68</p> <p>1 HEARING OFFICER WEBSTER: Thank you. 2 MS. FUJI KREIDER: I was not planning on 3 speaking tonight but a couple things came up that I've 4 been hearing about and I just want to make a couple 5 comments. It won't even take the whole time I don't 6 think. 7 I am with the Stop B2H Coalition. I'm a board 8 member. We are not a NIMBY organization; we are 9 activists fighting the line entirely. I'm not talking 10 about moving the line; we do not want the line. 11 However, you will hear, as you heard tonight 12 and you'll hear all along the way, and all the public 13 comments will be directed towards your standards and 14 about the siting of the line, all the impacts that 15 you've heard tonight and more, so I won't get into that. 16 What I do want to just say is I related to the 17 cost and some of the issues that I've heard tonight 18 mentioned. Things are changing for Idaho Power. 19 Technology is changing radically and the costs are also 20 changing. I started in the 2015 OPUC docket. Since 21 that time I've attended every Idaho Power Integrated 22 Resource Planning meeting in Boise. I go every month; 23 anywhere from two to five of us attend those meetings 24 every month. We went through eight meetings and a 25 workshop in the 2017 IRP and the PUC docket. We've been</p>
<p style="text-align: right;">Page 67</p> <p>1 There's a big mountain up there, I know there's a 2 airstrip because I fly. Put it up there. Go over the 3 mountain. It's going to cost more. 4 But even though you're not going to start 5 building until 2023 when most of us will be gone or in a 6 home or not able to remember this meeting, it's going to 7 make a difference on the kids, and the kids that are 8 going to come and visit you in that retirement center. 9 Not in Salem, not in Washington, DC. But every rancher, 10 and I heard somebody saying, Oh, we're not going to get 11 the promises. You know, it's politics. Forget about 12 the promises, we all know how that worked out. So 13 that's off the board. 14 We're all going to get together, we're going 15 to be informed and we're not going to go on Facebook and 16 push "like" any more. We're going to get people to 17 these meetings. The '60s were great. We need to go 18 there. 19 Thank you. 20 HEARING OFFICER WEBSTER: Thank you. 21 MS. FUJI KREIDER: I'm Fuji Kreider, 60366 22 Marvin Road, La Grande. That's all you need; right? 23 HEARING OFFICER WEBSTER: Yes. If you would 24 spell your last name. 25 MS. FUJI KREIDER: K-r-e-i-d-e-r.</p>	<p style="text-align: right;">Page 69</p> <p>1 to every meeting in the 2019 IRP. The docket will be 2 opened in the summer when OPC opens it up. 3 Much of what I -- well, generally a lot of 4 what I talk about with cost I will be referring to the 5 PUC on to protect the ratepayers. But I do want you to 6 know that this B2H line is not the only option. It is 7 not the only option for Idaho Power. And the options 8 keep changing. As technology keeps changing, they have 9 more and more options. 10 Also, the cost of things are going down. So 11 back in the 2017 IRP days, when we insisted put 12 batteries, put stored, put some alternative technologies 13 into your Integrated Resource Plan, it was like, Oh, no, 14 no, no, that's too far out. Ten, 20 years from now I'll 15 say, Well, it seems like it's coming awfully sooner than 16 that. Talk to the Idaho Power executives and stuff that 17 are in the room, Oh, I agree with you, Fuji, yes, 18 distributed generation and distribution is the way of 19 the future, but that's still 20 years out. 20 Well, next round IRP 2 years later, we're a 21 year and a half later, solar and batteries are in their 22 Integrated Resource Plan. They just signed on with 23 Jackpot Holdings, the cheapest solar in the country. 24 Things keep changing. 25 Now, when you hear tonight a number of things</p>

<p style="text-align: right;">Page 70</p> <p>1 that people have talked about, the federal corridor, the 2 central Oregon road, go to the federal corridor. Why 3 don't you go that way, that's what Baker County has been 4 saying from the beginning. Idaho Power, No, that's a 5 hundred miles out of the way. That will cost too much. 6 Burying the line. Oh, can't bury the line, it 7 might cost as much as Chino Hills that went under an 8 interstate and shopping mall and a whole -- I mean, 9 okay, that's what they wanted to use. 10 Substations, dropping off some pops along the 11 way, some substations, the cost of that. All these 12 costs, why are they saying it's too expensive or we 13 can't do it? I'll tell you why. Because that changes 14 the cost of the B2H portfolio. 15 In the 2019 round, there were 24 portfolios to 16 beat Idaho Power's need. We won't even get into all 17 that stuff yet, we'll maybe talk about that tomorrow in 18 La Grande. But to meet their need now, this go-round in 19 2019, we listened to and they created in their computer 20 modeling 24 portfolios; 12 with B2H, 12 without B2H. 21 B2H portfolio is the cheapest portfolio. 22 If you added one of those things, the federal 23 corridor, the burying the line or some substations, B2H 24 is no longer the least-cost portfolio in Idaho Power's 25 toolbox.</p>	<p style="text-align: right;">Page 72</p> <p>1 Mark, one of the issues that has been raised 2 is invasive weed spread and whether or not Idaho Power 3 is going to be submitting an invasive weed management 4 plan. I believe that was referred to in the 5 application. Can you talk a little bit about that. 6 MR. MARK STOKES: Yes, certainly, Vice 7 Chairman. 8 There's a lot of plans like the noxious weed 9 plan that were, we call them frameworks at this point, 10 that were developed as a part of the NEPA process, 11 working through that with BLM. And the intent all along 12 has been that when we get to the point where we have 13 more certainty on the route and other things associated 14 with the line, that we would then go back and flesh out 15 those plans, put all the details in. And it would be at 16 that point that we would expect to work through each of 17 the counties to make sure that the specific plans met 18 their needs. 19 So it's certainly in our plan to go out and do 20 that. And that will all happen here roughly a year and 21 a half, 2 years when we develop what's called the 22 construction POD, or plan of development, which is a 23 pretty sizable document that will include all of those 24 other plans. There will be things in there that address 25 section 106, cultural issues, fire prevention and</p>
<p style="text-align: right;">Page 71</p> <p>1 So we're not going to go away. We'll take 2 this to the PUCs in both states. We keep on, we keep 3 going. You'll hear more tomorrow, and all of our stuff 4 will be in writing of course by the deadline. 5 Thank you. 6 HEARING OFFICER WEBSTER: Thank you. 7 Is there a last call for anybody to give 8 comment before we have Mr. Stokes up? Is there anybody 9 on the phone that's listening in that would like to give 10 comment? Okay. Hearing none, we'll hear from 11 Mr. Stokes. 12 MR. MARK STOKES: Good evening. My name is 13 Mark Stokes. Address is 1221 West Idaho Street, Boise, 14 Idaho 83702. I'm an engineering project leader for 15 Idaho Power, and the project leader for the Boardman to 16 Hemingway project. 17 Here tonight, I was not going to make any 18 specific comments on everything that's been said this 19 evening but I did want to avail myself to answer any 20 questions that Council members may have. 21 HEARING OFFICER WEBSTER: Any questions, 22 Council, for Mr. Stokes? 23 CHAIRMAN BEYELER: No. 24 VICE CHAIRMAN JENKINS: I do have a question 25 for Mark.</p>	<p style="text-align: right;">Page 73</p> <p>1 protection plans. There's a lot of them. We can go 2 back and look at the list if we need to. But we 3 certainly do plan on addressing those. 4 VICE CHAIRMAN JENKINS: Thank you. 5 HEARING OFFICER WEBSTER: Any other questions? 6 Thank you. 7 What is going to happen on our end now is we, 8 those of us, the Council members and the DOE people and 9 me, we will be here until 8:00 or close to 8:00 in case 10 there's anybody that comes in that wants to provide 11 public testimony. But for now, it's 6:38 and we'll 12 recess and we will reconvene if somebody does join us 13 and want to give testimony. 14 So thank you everybody. 15 (Hearing recessed at 6:38 p.m.) 16 17 18 19 20 21 22 23 24 25</p>



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Written Testimony

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

<p style="text-align: right;">Page 62</p> <p>1 a right, it's going to go east. 2 Now I hear that all these data centers who 3 were all in, all of us are in there, isn't that 4 pleasant? And may I say, the planning commission, the 5 Port of Morrow, they are going to regret the day that 6 they let these data centers come here. Some day they're 7 going to use all the water and all the power. And right 8 now there's no power to run the rest of them. I guess 9 there's two or three built. I don't know, I don't care. 10 And there's probably five more to go. 11 What is going on? Who allows this fiasco in 12 our backyard? So is the Idaho Power line going to feed 13 these? I don't know. I don't have the answers. Nobody 14 is willing to say anything. And you think, you think 15 that your elected officials are going to help us out 16 here. They wouldn't allow this to happen to us, have 17 somebody ruin our farms. 18 Then you find out, I read about Greg Smith the 19 other day, being the big buddy of the people of the Port 20 of Morrow. It's almost like he runs his own Clinton 21 Foundation. It's mind-boggling and unbelievable to me, 22 but he's obviously not going to help us out. 23 So I have nowhere to go. Nowhere. Nobody is 24 willing to listen. But all I know is Mark Stokes, 25 project guy, engineer, project leader, you're not coming</p>	<p style="text-align: right;">Page 64</p> <p>1 going to have questions for Idaho Power tonight. No? 2 Why don't we take a break now and we'll 3 reconvene in about 15 minutes, then we'll hear from the 4 last two. Give people an opportunity to, if there's 5 anybody here that hasn't filled out a comment card that 6 wants to do so, please do so during the break. 7 We'll reconvene about 6:40. 8 (Recess taken.) 9 HEARING OFFICER WEBSTER: It is 6:44. We are 10 back on. 11 My understanding is that we have somebody that 12 has joined us on the phone that would like to give 13 public comment as well. If you're out there, would you 14 please make yourself known. 15 Well, I will come back around to triple check 16 in a minute. 17 But here in person to give testimony tonight 18 is, coming up next is Fuji Kreider. 19 MS. FUJI KREIDER: Good evening. Fuji 20 Kreider, 60366 Marvin Road, La Grande, Oregon. Thanks, 21 and thanks for hearing from me again. 22 First off, I want to thank you all sincerely, 23 all of you, Council and the staff, for the action that 24 you took last evening. That was to extend to the 25 comment period another 30 days to August.</p>
<p style="text-align: right;">Page 63</p> <p>1 through my farm. I won't allow it. Jeff Maffuccio, who 2 I have talked to I don't know how many times before, 3 facilities siting coordinator, you're not coming 4 through. I will not allow it. 5 And can you imagine 300 miles of pissed-off 6 people when this gets rolling, and I will hope that 7 there will be civil disobedience with this fiasco, that 8 will not allow it to be built. I pray every night and 9 all day that this line is not built. It has stolen my 10 joy. This goes on every day, the stress, the thought of 11 it. 12 It's like a bank foreclosure. You're waiting 13 on a bank foreclosure that goes on for 15 years. It has 14 stolen my joy. I'm not happy about it. I'm very angry. 15 And I will not allow it to be built on my farm, to ruin 16 my ranch, my family's ranch. It will not happen. I 17 won't allow it. 18 Thank you. And, no matter what happens, we 19 all have to look in the mirror every morning. Please do 20 not let this happen. Please do not vote and let this 21 happen. Thank you. 22 HEARING OFFICER WEBSTER: Thank you. 23 We have one more comment card. I don't know 24 if Council is going to have questions for -- we have two 25 more comment cards. And I don't know if Council is</p>	<p style="text-align: right;">Page 65</p> <p>1 And I want to say, and maybe you were starting 2 to observe from the prior meetings, that you weren't 3 getting people testifying with significant specificity, 4 or whatever the word is. With the first month, with the 5 draft proposed order in front of us, as I mentioned to 6 you last night, people are very, very confused. And the 7 draft proposed order doesn't have the same table of 8 contents as the exhibits and this and that, no numbers 9 and attachments, and other things. It was just getting 10 to be crazy lately. So I really appreciate the extra 30 11 days. 12 I think at this point, most of us have 13 navigated the table of contents and we understand what 14 documents we have to look at and all. So this gives us 15 a little more time to digest it. So thank you for that. 16 You know I've been at all five of these 17 hearings, you've seen me, most of you, that also have 18 been at all five meetings and are probably as tired as I 19 am, or more so, you have to sit and pay attention. 20 But I thought that maybe tonight because I too 21 am going to submit my written comments by the deadline, 22 but I thought I'd take a little time tonight because you 23 don't have a lot speakers. As one of the gentlemen 24 said, it's not really in the culture of east Oregonians 25 to do a lot of public testimony; so we're slow at this.</p>

<p style="text-align: right;">Page 66</p> <p>1 But I thought that maybe it would be good for you to 2 just know who I am and a little bit about my journey 3 that got me here and why I'm passionate about this issue 4 and keep coming to all the meetings. 5 I live in La Grande. For about 6 1/2 years my 6 husband and I left and we worked internationally and we 7 worked in international development work, democracy, 8 governance, in the Balkans predominantly -- 9 international development work in democracy and 10 governance processes as an advisor, and also with 11 climate refugees. And so I am also very passionate 12 about climate change and climate issues. 13 We returned in the end, the very end of 2008. 14 In early 2009, just feeling all this -- returning from 15 being abroad, you have a lot of stuff to adapt to. But 16 a big thing was our neighbors. We've been in La Grande 17 since '87, prior to that in Boise actually. So I know a 18 lot of the Idaho Power people, too. 19 But there was a stress. What is going on 20 here? What is happening to the community? People were, 21 like there was this big thing about this power line. 22 And neighbors were pitted against neighbors and 23 everybody was pointing their fingers, No, it should go 24 there, it should go there. It was like the neighborhood 25 was pretty much falling apart.</p>	<p style="text-align: right;">Page 68</p> <p>1 of NIMBYs. And we are NIMBYs unless we really 2 understand what this is about. We've got to find out 3 what the need is and why they want to do this. 4 So that started our research. Then from 5 there, we started our group. People started researching 6 their various options. We were in the EIS process at 7 the time. Some people got into environmental stuff. 8 And you guys know Irene, she's the EFSC, blah, blah, 9 blah. 10 Myself got into the real, what's the real 11 need. So my husband and I, and occasionally two or 12 three others, went to Boise every month for 8 months the 13 first year, and then a year and a half later 8 months 14 again with transmission workshops, and then over to the 15 PUC in Salem, et cetera, et cetera. Some of this I told 16 you in Baker. And we educated ourselves. We had to 17 find out. 18 I wanted to know: Am I going to be on the 19 wrong side of history here? Does Idaho Power really 20 need power? Does Idaho need power? I lived in Idaho. 21 I love Idaho. Do they need the power? 22 So in the beginning this started, by 2026, 23 351 megawatts of power, Idaho Power will be short 24 because they're closing the coal plants. Right on, 25 they're closing the coal plants. I'm a climate</p>
<p style="text-align: right;">Page 67</p> <p>1 And now, prior to leaving and continued when 2 we returned, I manage the neighborhood listserv. In my 3 neighborhood, which is Morgan Lake neighborhood, you 4 heard from many of my neighbors the other night, I 5 manage the listserv. We have no fire protection so we 6 had to keep in touch with other each; lost pets, the cow 7 is out, a fire is starting. So we keep in touch. 8 So the stress, I was like, Okay, what are we 9 going to do? So we got everybody together. A lot of 10 people had gotten letters from Idaho Power at that 11 point. We got together and said, Okay. What's going 12 on? What can we agree to? Can we figure something out? 13 The only thing we could really agree to was 14 nobody wanted the line. That was a no-brainer. Of 15 course nobody wants a line. But it's not needed, we 16 don't get a substation, there's no power for us, all of 17 these things. Not to mention all the environmental 18 issues, et cetera. So we said, Okay. So one thing we 19 can all agree to, and we can stop this infighting in the 20 neighborhood, is we don't need the line. So let's 21 organize and start to fight it. This was the beginning 22 of the Stop B2H Coalition. That's our little story to 23 tell you. 24 However, I said to the group even, and then 25 thereafter in the email threads, We sound like a bunch</p>	<p style="text-align: right;">Page 69</p> <p>1 activist, too. So great thing. 2 350 megawatts, huh, 351 as a matter of fact is 3 the number. That's not -- let's figure this out. Let's 4 see how it goes. So in these IRP meetings, Integrated 5 Resource Planning meetings, coming up with other stuff, 6 other ideas; solar, wind, renewables, et cetera. Oh, 7 no, oh, no, that's too far out into the future. We 8 can't have that. That's too far out in the future. 9 So over time now, two IRP rounds I've been, 10 and I've testified at three IRP rounds with the Public 11 Utility Commission, Idaho Power now has portfolios, 12 that's what it's called, how to satisfy need, they call 13 it portfolios, they have portfolios with solar, battery 14 storage, wind storage, pump storage. Now, some of them 15 are astronomical prices, don't get me wrong. But a lot 16 of them are within reason. 17 They have 24 portfolios to meet their need; 18 they have 12 with B2H, 12 without B2H. Now, you don't 19 need to hear about the 350 megawatts any more at these 20 meetings. That's long gone. They put on 480 megawatts 21 of renewables already in southern Idaho, not counting 22 the Jackpot holding solar farm that I talked about in 23 Baker. 24 This is just context for you guys. I know 25 you're not going to deal with this need stuff in this</p>

<p style="text-align: right;">Page 70</p> <p>1 way; it's a Public Utility Commission thing. But I want 2 to give you the backdrop. The backdrop is: There are 3 other ways that Idaho Power can meet its needs. 4 Now, the more recent need is about capacity. 5 You don't hear any more about 350 megawatts, coal plants 6 closing; now it's about capacity. So what about 7 capacity? 8 The last go-around with IRP, capacity comes 9 up. We're researching and learning a lot more about 10 capacity nowadays. I can tell you from these meetings 11 and what their options are, there also are choices. Do 12 not feel in a lurch about this. There are plenty of 13 other choices. And every time we go there are more and 14 more options. Technology is improving, costs are going 15 down. 16 For example, something like batteries, which 17 could really, very much it's a game changer for 18 transmission. You've got batteries that are not just 19 battery storage for a solar farm, they actually provide 20 voltage regulation, they smooth the balance on the grid, 21 the peaks and valleys of renewables. Batteries actually 22 regulate that. So they offer about six different 23 ancillary services that can help and secure our grid. 24 And they're not just a storage option, although that is 25 what they do as well.</p>	<p style="text-align: right;">Page 72</p> <p>1 make more money. It doesn't really change our life. 2 I told you about storage. Anyway, the 3 interesting thing in all of this is when we also got 4 started, we researched and learned a lot about the 5 energy industry, and seeing that the future is not going 6 in a centralized grid; the future is in a decentralized 7 grid. 8 I'm proud to be an Oregonian. And I am proud 9 to know on the other side of the state we are working to 10 prepare for microgrids for the Cascadia event, a big 11 tsunami. We're planning for microgrids, we've got all 12 kinds of emergency preparedness, we can disconnect from 13 the central grid, they can island themselves off around 14 these smaller grids. 15 And we should be doing the same thing here in 16 eastern Oregon for fires. There's no reason why we are 17 not preparing for the big forest fire. 18 I live in La Grande. You heard people talk 19 about it the other night. We are like Paradise. It's 20 not going to be our paradise though. We're going to 21 make it different. We are not going to burn up. We are 22 really working hard to protect ourselves. But we have 23 the same kind of climate; we're even drier. We have the 24 same kind of winds, if not stronger, in Paradise. This 25 line is going so close to the city of La Grande that has</p>
<p style="text-align: right;">Page 71</p> <p>1 So as I said, I'm telling you some of this 2 more to put it into context of the urgency or the need 3 that you hear out of Idaho Power, and why so many of us 4 who have so much at stake, and you've heard a lot from 5 people over the last few days and last week, that it 6 would be one thing, if there was no other way; but we 7 know there are other options. This destruction of 8 people's lives and land and habitat and everything else, 9 and the risk of fire, has us all really on edge and 10 living in fear. 11 And I want you to know there are other ways 12 and don't feel like your feet are being held to the 13 fire. 14 It was mentioned tonight a little bit about 15 EIM, energy imbalance market. The energy imbalance 16 market exists already. They're all involved. Idaho 17 Power has been over a year, a year ago April in '18 or 18 whenever they joined finally, okay, it sounds good on 19 the surface. Again, another green thing, let's move the 20 energy around. It's good in that way. But it isn't 21 that you have to have this more transmission to be part 22 of the EIM. The EIM exists, people are participating. 23 And I can tell you, they're making a lot of money. 24 The EIM also makes a lot of money. So if you 25 had more lines, you could do more EIM, you could also</p>	<p style="text-align: right;">Page 73</p> <p>1 everyone on edge. We are more on edge than ever. 2 You heard from my neighbor, lives right down 3 the hill from me. Her house burned in '74, the last big 4 fire. You go to the fire museum in our town, you see 5 where the fire burned. It nearly burned the whole city 6 down and the hospital. Look at where the line is. It's 7 just mind-boggling to many of us that you would even 8 consider, the company could even consider putting a line 9 so close to such a population base. 10 Now, jumping around a little bit. But you've 11 heard a lot of -- what I meant to say in the midst of 12 all this, the line changes a lot. You heard that from 13 other people, too, how it moves this way, that way, 14 whatever. Some of that, from our experience, was 15 interesting because the two routes that you're looking 16 at in Union County, what the company is looking at, did 17 not exist in those early days of our organizing the Stop 18 B2H Coalition. 19 And I can't help but keep this mantra in my 20 head: No good deed goes unpunished. Because when I was 21 part of this coalition initially, we were trying to 22 protect the elk herd. It's a really big elk herd, it's 23 very popular. Most of you have heard about it. People 24 will say it's the next big thing after Jackson Hole, and 25 we need to protect the big game going through the Morgan</p>

<p style="text-align: right;">Page 74</p> <p>1 Lake area.</p> <p>2 Well, now the power line is in my viewshed,</p> <p>3 and I generally do not disclose this. I like to think</p> <p>4 of myself as an activist; I'm not a NIMBY. I am not</p> <p>5 looking to move the line. I am telling you the line is</p> <p>6 not needed, but I am directly affected and I have to</p> <p>7 disclose that. Most of the people know this, Idaho</p> <p>8 Power knows where I live. So I might as well put it out</p> <p>9 to you there.</p> <p>10 I will have, without a tree blocking my view,</p> <p>11 four towers across my viewshed and then the big span</p> <p>12 across Morgan Lake Road over to the next hillside.</p> <p>13 Hanley knows where I live, too.</p> <p>14 But the thing is, just like some of the people</p> <p>15 you heard tonight, it's our life. And now I'm not a</p> <p>16 farmer; so it's not my livelihood. But there was many,</p> <p>17 many days, many days living abroad, working in hard</p> <p>18 conditions, when the only thing that could pull me</p> <p>19 through was the vision of my view. Now, you might not</p> <p>20 think viewsheds have a lot of value. Viewsheds are</p> <p>21 priceless. That viewshed is what kept me going. When I</p> <p>22 returned and working on this project, day in and day</p> <p>23 out, I work -- I have big bay windows, and that is where</p> <p>24 I look out on, and it is what keeps me going and it is</p> <p>25 why I am working so hard to protect it.</p>	<p style="text-align: right;">Page 76</p> <p>1 itself is a big problem. And you can just start there</p> <p>2 and everything will flow from there. Because if you</p> <p>3 don't have those boundaries right you have to do the</p> <p>4 notification over again, and you have a lot of problems.</p> <p>5 So that is the first big thing.</p> <p>6 You heard in La Grande about the blasting,</p> <p>7 about the slope for the Mill Creek route. We have got</p> <p>8 soil, loose soils, slopes, the hospital right there, you</p> <p>9 have got problems with that. You heard a lot about</p> <p>10 that. And I didn't even realize about -- I knew a bit</p> <p>11 about soil health and whatnot, but listening to Sam</p> <p>12 Myers speak, I was like, Wow, this is quite an issue</p> <p>13 with the soil biochemistries as well.</p> <p>14 Noise, you have listened to noise the other</p> <p>15 night, the guys that have disabilities and then are</p> <p>16 going to have towers over them and the noise factor.</p> <p>17 The roads, the amount of roads is</p> <p>18 unbelievable. When you think of 670 miles of access</p> <p>19 roads, 400 miles of new or improved roads, the weeds are</p> <p>20 just -- you just can't even image. It's not just a cut</p> <p>21 through the land and then some of our landscapes, these</p> <p>22 are scars, these are big scars because they are not all</p> <p>23 treed, it's mixed, as you know.</p> <p>24 But the weeds will be phenomenal, as many</p> <p>25 people you've heard speak about, the effects on</p>
<p style="text-align: right;">Page 75</p> <p>1 So that's my story. I continue to work on</p> <p>2 this. Now I'm totally sucked in as an energy activist,</p> <p>3 a climate activist. We will be in front of the PUC next</p> <p>4 spring, and on and on and on.</p> <p>5 You heard a lot about -- and I will dip into a</p> <p>6 little bit of the project and will write about in our</p> <p>7 comments, I won't tell you anything I just told you in</p> <p>8 my comments, but I will write things about, for example,</p> <p>9 the boundaries. The boundaries are very, very</p> <p>10 questionable. The boundaries in front of my house are</p> <p>11 going to take another piece of my land across the way of</p> <p>12 the viewshed. There's a road to a nowhere. It's a road</p> <p>13 to a tower. It doesn't connect to anything. It doesn't</p> <p>14 connect to the road of my house. It doesn't connect to</p> <p>15 the Morgan Lake Road. There is this road to nowhere.</p> <p>16 That is one little boundary.</p> <p>17 There is boundaries around all the spur roads</p> <p>18 and all of these different access roads. Some are in</p> <p>19 the project; some are not in the project. What is the</p> <p>20 rhyme and reason there? Is it because Idaho Power</p> <p>21 doesn't want to have to notify people because of where</p> <p>22 the certain boundaries line are that we incorporate more</p> <p>23 people? Is it because of mitigation and not wanting to</p> <p>24 mitigate in certain areas? It's not clear.</p> <p>25 But that part of the application in and of</p>	<p style="text-align: right;">Page 77</p> <p>1 agricultural land with those weeds, the cost involved in</p> <p>2 that, the property owners just dealing and contending</p> <p>3 with the weeds. The health of the rangelands that we</p> <p>4 have, the habitat, the big habitat issues with more</p> <p>5 weeds on the rangelands.</p> <p>6 Habitats, you heard about Washington ground</p> <p>7 squirrels, I do know a little bit, I lived in Morrow</p> <p>8 County, Washington ground squirrels. Most of Morrow</p> <p>9 County's route has not been even surveyed yet for</p> <p>10 Washington ground squirrels. So you have got issues</p> <p>11 there.</p> <p>12 The raptors, the eagles and other raptors</p> <p>13 around Ladd Marsh, Ladd Marsh is a protected area, it</p> <p>14 has a lot of tourism. We have a big birding festival in</p> <p>15 La Grande every year around Ladd Marsh, and this goes</p> <p>16 right through Ladd Marsh and through an area that</p> <p>17 already has federal mitigation lands on it. I won't get</p> <p>18 into that.</p> <p>19 You have sage-grouse, Mark Bennett talked</p> <p>20 about that in Baker County. Sage-grouse, the last of</p> <p>21 the subspecies, of a particular subspecies of</p> <p>22 sage-grouse about to go extinct and will when it goes</p> <p>23 through Baker County. That is just a number of -- I'm</p> <p>24 not going to get into fisheries and roads. But the</p> <p>25 environmental effects, you'll hear about that in writing</p>

<p style="text-align: right;">Page 78</p> <p>1 by many people, I'm sure.</p> <p>2 Tourism, recreation, I mentioned Ladd Marsh,</p> <p>3 but who in their right mind would think about putting</p> <p>4 those transmission towers in line, in front of the</p> <p>5 National Historic Oregon Trail Interpretive Center in</p> <p>6 Baker City. This is their premier tourism destination.</p> <p>7 We do not have much economy going on out here except</p> <p>8 for -- after you get ag and timber, the next thing is</p> <p>9 tourism. Yet, we are expected to just stomach this line</p> <p>10 coming through and across some of the best tourism and</p> <p>11 recreation areas that we have. Not just off the beaten</p> <p>12 path where you won't see things, these are coming right</p> <p>13 into the areas that we depend on for tourists to come,</p> <p>14 not an annual festival, even just local people day in</p> <p>15 and day out.</p> <p>16 The viewsheds, like I said, I feel like a "me</p> <p>17 too." My viewshed, the quality of life and how peaceful</p> <p>18 it all is for many of us. And I know a lot of people</p> <p>19 come and they think it's just bare ground out there,</p> <p>20 just sagebrush or whatever. But this is the vista the</p> <p>21 pioneers saw when they came over Flagstaff Hill and saw</p> <p>22 the Baker Valley, and they came into the Grande Ronde</p> <p>23 Valley, these huge open vistas. And these are things</p> <p>24 that are very dear to us and spiritual to us -- and I'm</p> <p>25 going way too deep -- the forest as well. But we all</p>	<p style="text-align: right;">Page 80</p> <p>1 lately in the news is fire and grid security. So back</p> <p>2 to industry, energy industry, and all that again.</p> <p>3 A centralized grid is becoming less and less</p> <p>4 secure for us. I mentioned the fire before and I</p> <p>5 mentioned planning for microgrids, like we are doing on</p> <p>6 the coast for the tsunami. We need to be planning from</p> <p>7 a bottom up grid, not a top down grid. It's going to be</p> <p>8 a very difficult transition. Just think of what Ma Bell</p> <p>9 went through and the telephone and the telecom.</p> <p>10 But a centralized grid is very susceptible,</p> <p>11 not only to the weather that we have, the trees falling</p> <p>12 down, whether it's an ice storm or whatever and taking</p> <p>13 out the grid, taking out the grid, having Cascadia</p> <p>14 failure for many, many communities, or even states, but</p> <p>15 also cyber attacks.</p> <p>16 So we know that we are hacking the Russian</p> <p>17 grid and we know that Russians are hacking our grid. We</p> <p>18 have domestic terrorists. Look at where we live. We</p> <p>19 had a Malheur takeover not too long ago. Don't kid</p> <p>20 yourself. This grid security stuff is big stuff. We</p> <p>21 have to be planning differently.</p> <p>22 And I know this isn't your gig, it's more</p> <p>23 again to the PUC, or even beyond them, because they</p> <p>24 don't even really get into that level. But it's in the</p> <p>25 news a lot, and people are not confident in continuing</p>
<p style="text-align: right;">Page 79</p> <p>1 have different things that keep us centered.</p> <p>2 So the big wide open spaces is a big deal for</p> <p>3 many of us, and please do not discount it. Real</p> <p>4 property values, my property value for certain is going</p> <p>5 down. I talked to the appraiser to come up and give me</p> <p>6 an appraisal. There is no way. I live in a remodelled</p> <p>7 trailer basically, but I have got a million dollar view,</p> <p>8 and that view is going to be gone. So I'm just going to</p> <p>9 have my little mobile home that is worth nothing. I</p> <p>10 mean, property values is also a big deal for many of us.</p> <p>11 Eastern Oregon University, it's a rural</p> <p>12 university, they have to make a go of it. We don't have</p> <p>13 a state board of ed anymore. And you stand on the</p> <p>14 campus and you look up at the hillside, and there will</p> <p>15 be a transmission line. Now, I know when I was looking</p> <p>16 around at colleges with my parents, we looked around and</p> <p>17 saw how pretty and how nice it was or what you could do,</p> <p>18 what was the recreation in the area, et cetera,</p> <p>19 et cetera. And I just look at that and I think, how</p> <p>20 could that not affect recruitment, recruitment at our</p> <p>21 premier rural college, or a rural university for the</p> <p>22 state of Oregon.</p> <p>23 Anyway, the last kind of parts that I just</p> <p>24 wanted -- I'm jotting some notes down and wanted to</p> <p>25 share are big ones in the news. The real big ones</p>	<p style="text-align: right;">Page 81</p> <p>1 the path of investment, a \$1.2 billion investment that</p> <p>2 we are going to be paying 30 years or more for something</p> <p>3 that is already outdated. So the grid security issue is</p> <p>4 problematic.</p> <p>5 And then fire, fire, everybody talked about</p> <p>6 fire, you all heard about fire. We live in fear of</p> <p>7 fire.</p> <p>8 Now, the BPA recently has done a really good</p> <p>9 move. First of all, they canceled out of the I-5</p> <p>10 Corridor Reinforcement Project. It went from southwest</p> <p>11 Washington to Troutdale. Why? In their CEO's piece on</p> <p>12 that, he said, We are going for the more wireless</p> <p>13 solution. That's the future. It's not really wireless.</p> <p>14 What it is we are talking about is building generation</p> <p>15 closer to load so you don't have so much transmission.</p> <p>16 Now, you are still going to have distribution.</p> <p>17 I'm not talking -- it's funny they use the word</p> <p>18 "wireless solution" because it's not totally wireless.</p> <p>19 But when you build close to the load, you do not have</p> <p>20 the transmission losses of 12 to 20 percent</p> <p>21 transmission loss. You do not have these risks of cyber</p> <p>22 attack as much as you would with the centralized grid.</p> <p>23 You don't have as much fire risk. Smaller lines, less</p> <p>24 heavy.</p> <p>25 And BPA is upgrading, they are moving towards</p>

<p style="text-align: right;">Page 82</p> <p>1 the more digitized grid, smart technologies in the 2 substation. They are moving to maintaining their 3 current infrastructure. That's the recent stuff with 4 their budget. We've been analyzing their budget and 5 seeing where they are putting their money, which, by the 6 way, they still have not budgeted for B2H, except for 7 permitting, but they are putting money into fixing their 8 poles, their lines, their corridors and investing there. 9 These folks are really, I think, looking to the future. 10 Now, maybe necessity is the mother of 11 invention, and BPA is in a world of financial hurt, 12 whereas, the other two investor-owned utilities, they 13 are not in a world of hurt financially. As a matter of 14 fact, they just continue to see the dollar signs in 15 their eyes. Because, again, when you have this 16 transmission line, it isn't just for free. 17 So all of our wind farms and all of our 18 renewables are also going to have to pay wielding 19 charges on these new lines, this new line, and it's not 20 going to be a cheap thing for us. Who gets those taxes 21 or those tariffs on those lines? The companies that own 22 that line. 23 Again, back to the energy imbalance market. 24 It isn't just sounding nice, we move around energy. We 25 are talking big money and big profits here.</p>	<p style="text-align: right;">Page 84</p> <p>1 investor-owned utilities can be incentivized to take 2 some risks, to not just go least costly, least risk 3 portfolio. Maybe take a little more risk, do something 4 a little more innovative, more towards the green energy 5 future that we are about to head into. And the market 6 is going to do that for us. I know it will. 7 But I think here in Oregon we have something 8 going for us because we are moving in that direction 9 already with the regulatory reforms on the table, if 10 they ever get back to work. That's another story; 11 right? 12 And part of that is green energy jobs, not 13 just putting solar panels or whatever, but I'm talking 14 about insulation, windows, new building codes, energy 15 efficient appliances, and on and on and on. We have so 16 much of an industry that can be emerging for us, 17 especially in rural Oregon where we don't have so many 18 opportunities. But a handful a transmission jobs, 4 to 19 6 months? First off, 4 to 6 months, 25 percent local 20 hires for 245 jobs. How many jobs does that come to and 21 what are they going to do? They are driving some trucks 22 around, cleaning up stuff. No real long-term jobs. 23 Under 10, it's confidential, but we know -- so it's a 24 handful of jobs that will be the long-term jobs. 25 When you can think of all the green energy</p>
<p style="text-align: right;">Page 83</p> <p>1 So that's the bottom line, that's what we are 2 up against. And all of us who have our lives, our 3 livelihood and the people that you heard from for the 4 last 2 weeks, I hope you hear us, because this is what 5 we are up against. It's basically a David and Goliath 6 kind of thing. And we are going to do the best we can. 7 We are not going to go away. We are not going to stop, 8 because for many of us, this is all we really have. So 9 we are going to keep working at it, and we are going to 10 do the best we can. Like I said, I'm trying to not 11 personalize this. 12 Dealing with the standards you have, the 13 application, the DPO, we are going to do our best 14 research, we are going to send you the best comments we 15 can with they extra 30 days you gave us. 16 But it's been really stressful, extremely 17 stressful. Sorry that I broke, I had a little meltdown 18 there. But I have hopes for Oregon. I really do. The 19 microgrids on the coast, I think that is the beginning 20 of something really new and really cool. I think we are 21 investing in renewables that we need to be investing in. 22 The regulatory reforms, for 8 months I was 23 involved in this process, Senate Bill 978, about the 24 regulatory reforms that have to happen. We are 25 incentivizing the investor-owned utilities so the</p>	<p style="text-align: right;">Page 85</p> <p>1 jobs that we could create with \$1.2 billion. Change all 2 the poles, re-conductor. They have five lines coming 3 from the Pacific Northwest into Idaho, five 230 lines, 4 they could all be re-conducted on the same poles, the 5 same corridor, and up them to 345s, at capacity. Do the 6 math on five of those lines. There are ways to do this 7 without building a new infrastructure and a new 8 corridor. 9 And co-locating? You co-locate, you can't 10 tell me that if a fire takes out the 230 line in my 11 neighborhood, that the 500 kV standing 125 feet next to 12 it isn't also going to go down. This is not redundancy 13 and resiliency that they are prophesying that it would 14 create. 15 I'm sorry. I'm going on longer and I'm 16 rambling. 17 But I trust that you guys will protect us. 18 The standards are good and meant to protect us and put 19 in conditions that are workable. 20 Now, they are starting to get outdated, sure. 21 You don't have climate standards. You don't have 22 environmental justice standards. And when you think of 23 Malheur County, where did the get line moved off of and 24 who is it in front of now? I didn't even want to get 25 into the environmental justice issues there.</p>

<p style="text-align: right;">Page 86</p> <p>1 But I still trust that we will do the right 2 thing here. And I believe over time that Idaho Power's 3 own IRP process will also discover that the 4 decentralized local generation, local distribution, 5 non-centralized huge transmission grid is the way of the 6 future. And once they change their business model to 7 correlate and align with that new energy future, I think 8 we are all going to be better off in the end. 9 So on a good day, I'm very optimistic; and on 10 a bad day, you catch me like you saw me a few minutes 11 ago. 12 So anyway, that is my journey, that is my 13 story. I probably won't ever talk to you guys again, 14 but you'll get my stuff in writing. And I wish you 15 luck. This is not an easy process. Thank you. 16 HEARING OFFICER WEBSTER: Thank you, 17 Ms. Kreider. 18 Next up we have Jerry Myers. 19 COUNCILLOR ROPPE: I have a question. How 20 many people do we have total? He said there was 21 somebody on the line, and we also wanted to talk to 22 Idaho Power before we leave, and we only have 45 minutes 23 left. 24 HEARING OFFICER WEBSTER: Right. He would be 25 the last member of the public and then we have Idaho</p>	<p style="text-align: right;">Page 88</p> <p>1 Everybody has one light there in each room. So that was 2 all they had. That was the only power they had. There 3 had to be a well, too. 4 So anyway, in my life, somewhat, I joined the 5 co-op when I got older than 21. And as another 6 neighbor, when running with Haddock on the -- was the 7 director, and he had to move to the country, somewhere 8 else. So he wanted to get a new director. So I said, 9 well, I thought maybe that would be fun, too. So I did 10 that for quite a while. 11 Then I had a tremendous amount of -- well, I 12 was there for 23 years. Even developing our country 13 around to where everybody had, at first, where they had 14 30 volts of electricity. That was just for everything 15 in the wiring and in the house, every building had to be 16 redone. 17 So we got that big, that new bolt of 18 electricity, that was really, just had one -- I think it 19 had just one big wire on all of the wires on about 20 25 miles. And that was the end of the line. And we 21 lived there at end of the line and we are on the last 22 pole. 23 So it didn't take very long, found out that we 24 needed a lot more, where everything we started buying, 25 things needed power. First thing you only had a</p>
<p style="text-align: right;">Page 87</p> <p>1 Power. 2 If there is anybody on the line, on the phone 3 line, that wants to speak up, please make yourself known 4 now. 5 COUNCILLOR ROPPE: Thank you. 6 HEARING OFFICER WEBSTER: So hearing none, we 7 have just Mr. Myers and then Idaho Power. 8 MR. JERRY MYERS: Thank you. It won't take 9 long. 10 HEARING OFFICER WEBSTER: If you could start 11 with your name and your address, please. 12 MR. JERRY MYERS: My name is Jerry Myers from 13 Butter Creek, Little Butter Creek. I have difficulty 14 talking sometimes. What more do you need? 68477 Little 15 Butter Creek. 16 I've got 5 more days and I'll be 85 years old. 17 My granddad started farming over there in 1898. And he 18 himself was a brother, and he didn't want to do that. 19 He just wanted to go to town and drink beer. 20 Well, we have done a lot of things on the 21 farm. It started from we didn't have any electricity 22 for anything at all. And so my granddad figured out a 23 way, something they called a tower, a tower with a 24 little fan on it, and he bought some gigantic batteries 25 and put it in a building. And that is what he kept.</p>	<p style="text-align: right;">Page 89</p> <p>1 battery, or an electric, something to charge things, the 2 thousands of elements of things that we have nowadays. 3 So the first thing you know pretty quick we 4 had to have bigger wire because the electricity gets 5 very low. I'm getting too far off the subject here. 6 But we will go directly to, as a director, I 7 learned slowly but I got, after a while, it seemed that 8 Bonneville electricity, power was everywhere I guess in 9 Idaho, that they were kind of tough people. So we had 10 to be careful dealing with. And it was something that 11 kind of developed over many years and did not have a 12 good subject to talk about. So that was the first thing 13 we noticed right away. 14 So for what more -- it took a tremendous 15 amount of electricity, but we had plenty of power right 16 here. And first thing in 1930, early '30s, all of 17 Bonneville had started building dams all around the 18 Columbia River, and they were big. They dammed the 19 whole river and built up everything. That was the 20 subject of many things. Went right from -- right here 21 on to out in all of Washington and right here. And it 22 mostly was pumping with electricity and water. So that 23 goes on and on forever practically. Every day I think 24 they built a new thing. 25 But I'll go back to my first part. It took me</p>

August 22, 2019

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

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,

Fuji Kreider
60366 Marvin Road
La Grande, Oregon 97850

fkreider@campblackdog.org

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

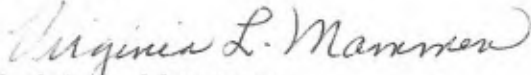
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,


Virginia L. Mammen
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**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

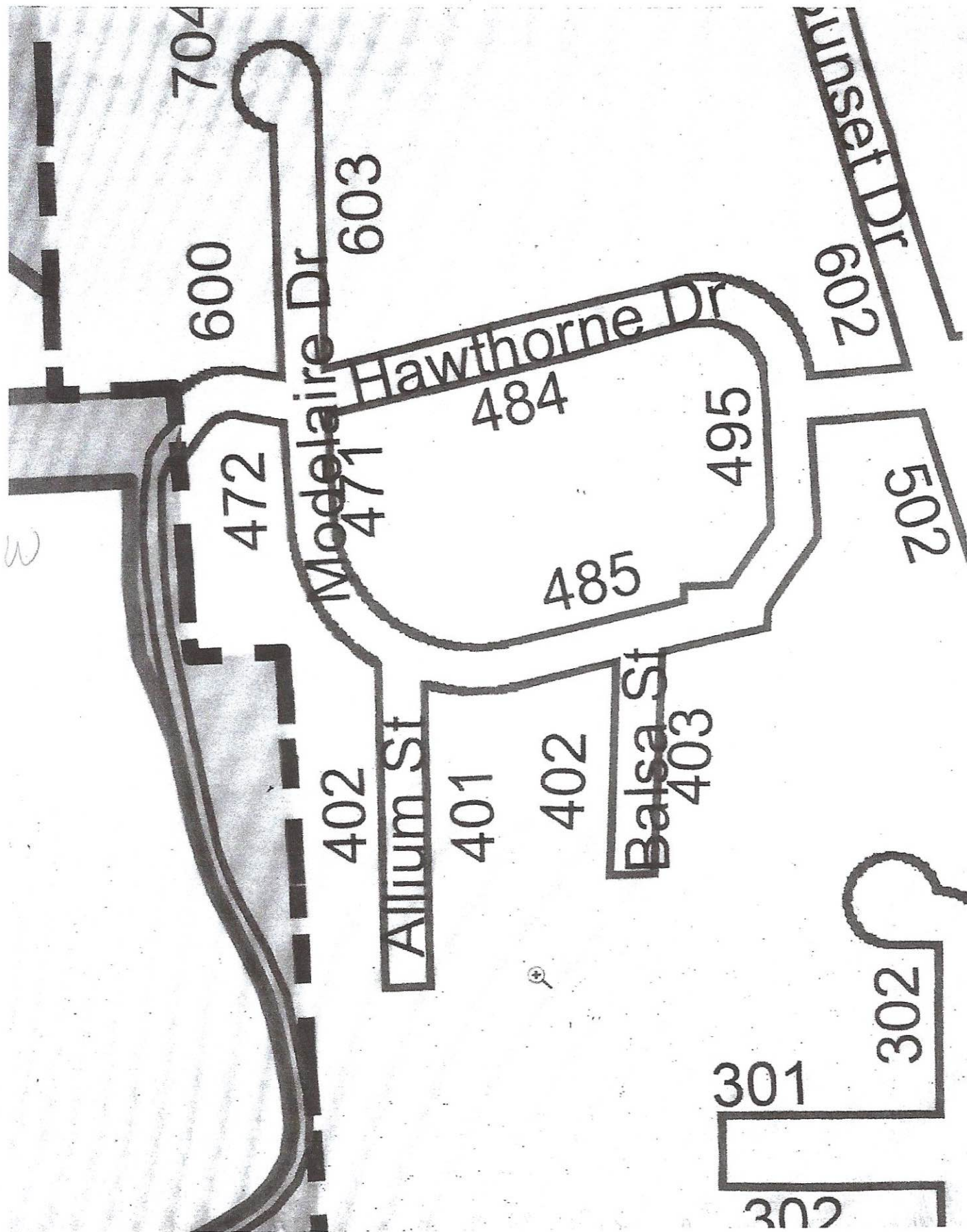
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

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

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

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

N



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Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



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

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

IV. CONCLUSIONS

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

V. ORDER AND CONDITIONS OF APPROVAL

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

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

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

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

Fri, Jul 12, 2019 at 1:51 PM

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

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

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

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

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

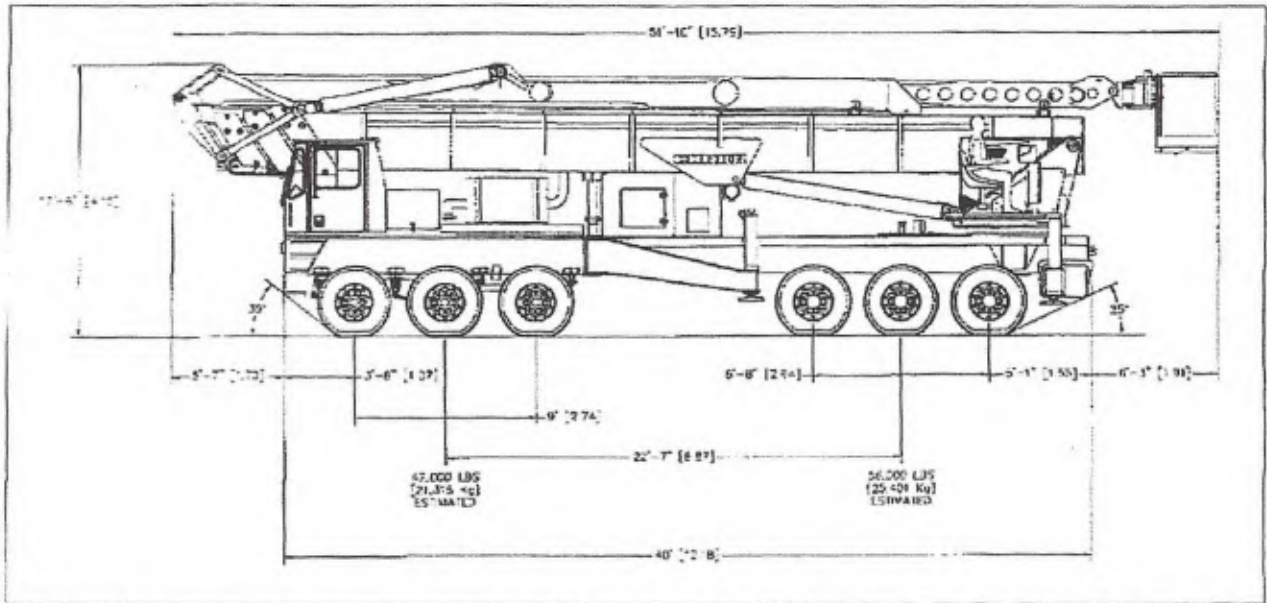


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

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

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

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

3.1.3 Traffic Related to Timber Removal

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

3.1.4 Impacts to V/C Ratios

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

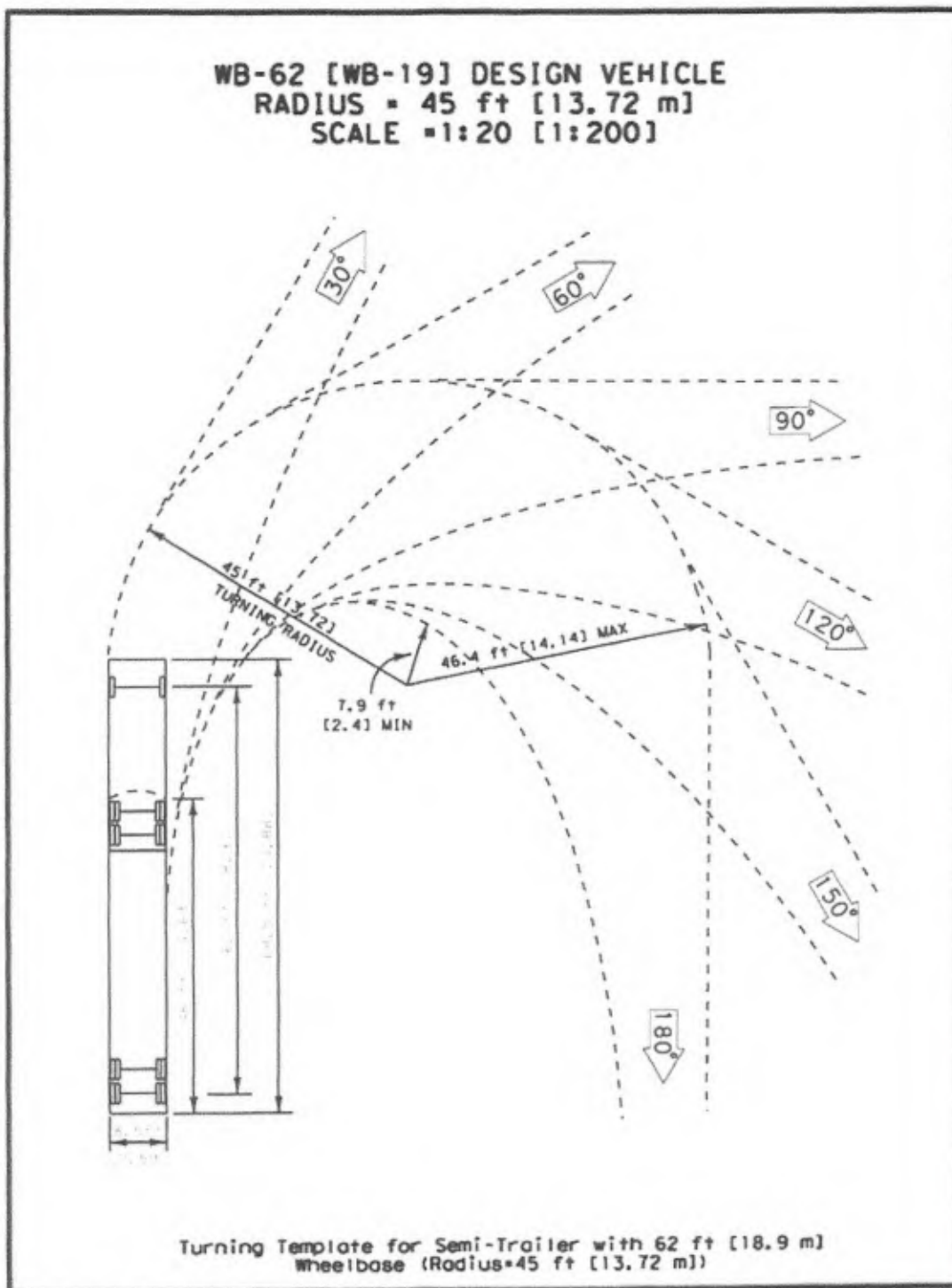
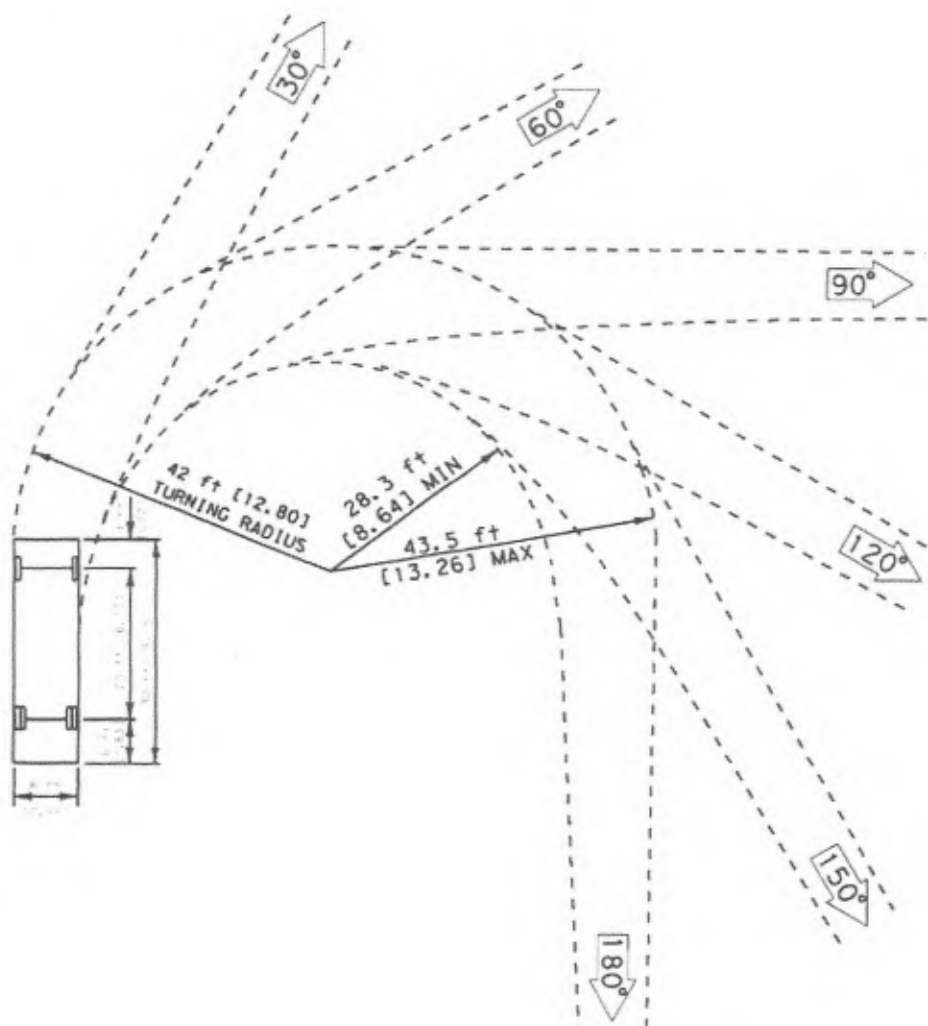


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

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



Turning Template for Single Unit Trucks or Buses

Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

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

Section 3. DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

Section 17. TRUCK ROUTES

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

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

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

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

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

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EMAIL

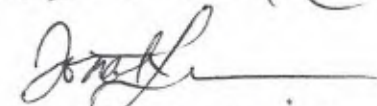

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SIGNATURE

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John Barutz

PRINTED NAME

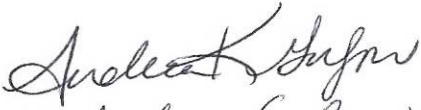
John Barutz


ADDRESS


484 Hawthorne LG, OR 97850


EMAIL


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SIGNATURE 
PRINTED NAME Andrea Gulzow
ADDRESS 486 Hawthorne DR, LA Grande
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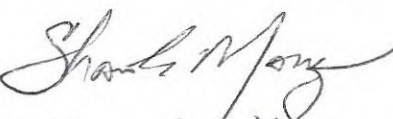
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SIGNATURE 
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EMAIL kimheitstuman@hotmail.com

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

SIGNATURE: 

PRINTED NAME Shawn K. Mangum

ADDRESS 2905 E. M. Ave,

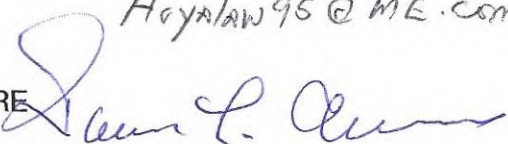
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SIGNATURE

PRINTED NAME

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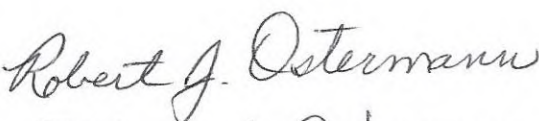

Linda Snyder
491 Modelaire Dr

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Robert J. Ostermann
495 Modelaire Dr. La Grande, OR 97850

SIGNATURE

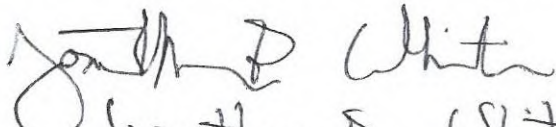
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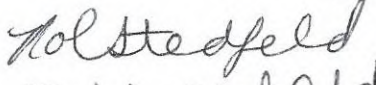
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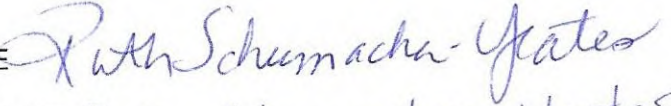

Robin J. Ostermann
495 Modelaire Dr La Grande, OR 97850

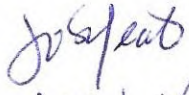
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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 Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

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

SIGNATURE 

PRINTED NAME LOIS BARRY

ADDRESS P.O. Box 566, La Grande, OR 97850

EMAIL loisbarry31@gmail.com

SIGNATURE 

PRINTED NAME CATHY WEBB

ADDRESS 1708 CEDAR ST. LAGRANDE, OR 97850

EMAIL thankski@gmail.com

SIGNATURE 

PRINTED NAME Jack L. Martin

ADDRESS 1412 Gilcrest Dr. LaGrande

EMAIL Buff Martin 27 @GMail.com

SIGNATURE 

PRINTED NAME GERALDINE BRASETH-PALMER

ADDRESS 1602 GILCREST DRIVE LA GRANDE, Ore 97850

EMAIL 


SIGNATURE 


PRINTED NAME Jean BAPH

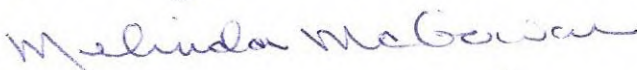
ADDRESS 1509 MADISON AVE LaGrande, OR 97850


EMAIL Jbaph19@gmail.com


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

SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL Sexton.damon@gmail.com

SIGNATURE 
PRINTED NAME Cory Sexton
ADDRESS 401 Balsa Street La Grande OR 97850
EMAIL Corytrix@gmail.com

SIGNATURE 
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE 
PRINTED NAME Keith D. Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL Keithdhudson@gmail.com

SIGNATURE 
PRINTED NAME Laura Elly Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL ellyhudson@gmail.com

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

SIGNATURE

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

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SIGNATURE

Anne G. Cavinato

PRINTED NAME

Anne G. Cavinato

ADDRESS 86 Hawthorne Dr. La Grande, OR 97850

EMAIL acavinat@ecu.edu

SIGNATURE

Joe Horst

PRINTED NAME

JOE HORST

ADDRESS

86 HAWTHORNE DR. LA GRANDE OR.

EMAIL

joehorst@comi.com

SIGNATURE

Angela Sherer

PRINTED NAME

ANGELA Sherer

ADDRESS

91 W. Hawthorne Dr. LaGrande, OR 97850

EMAIL asherer@frontier.com

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

SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, La Grande, Or. 97850
EMAIL asherer@pontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Modelaire Dr. La Grande, OR 97850
EMAIL hnull@comi.com

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

SIGNATURE *Lindsey McCullough*
PRINTED NAME Lindsey McCullough
ADDRESS 406 Balsa St., La Grande, OR 97850
EMAIL lindz_mm91@hotmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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

SIGNATURE *Merle E. Comfort*
PRINTED NAME MERLE E. COMFORT
ADDRESS 209 SCORPIO DRIVE LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL r-maille@icloud.com

SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C Kevan*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekeler Ln - La Grande, OR
EMAIL carolsummers1938@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 4th St. LaGrande - OR 97850
EMAIL

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

SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande, PR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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 184 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,

 Susan L. Kreutz
Signature Printed Name:

Mailing Address: 62187 Gaertner Lane
La Grande OR 97850

References

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

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

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

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

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

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

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

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

August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

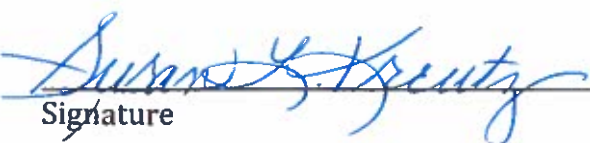
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming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

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

In summary:

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

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


Signature

Susan L. Kreutz
Printed Name

Mailing Address: 62187 Gaertner Lane
La Grande OR 97850

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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: Susan L. Kreutz
Mailing Address: 62187 Gaertner Lane
LaGrande 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 1/4 mile of blasting site.

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

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

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan L. Kreutz". The signature is fluid and cursive, with a large loop at the beginning.

Name: Susan L. Kreutz

Address: 62187 Gaertner Lane
La Grande OR 97850

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

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

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

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

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

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

Sincerely,



Signature

Printed Name:

Susan L. Kreutz

Mailing Address:

62187 Gaertner Lane
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,



Name: Susan L. Kreutz

Address: 62187 Gaertner Lane
La Grande, OR. 97850

August 16, 2019

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

RECEIVED

AUG 23 2019

DEPARTMENT OF ENERGY

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 May 23, 2019.

Chair Beyeler and Members of the Council:

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,



Name Ellen K. Reger
Address 2406 E M Ave
La Grande OR 97850

ESTERSON Sarah * ODOE

From: Earlene Lamb <peggye@eoni.com>
Sent: Wednesday, August 21, 2019 9:27 AM
To: B2H DPOComments * ODOE
Subject: B2H powerline

Chair Beyeler and Members of the Council:

Stop B2H Now.

When we moved to our home twenty years ago (403 Allium St.) we had to sign a statement that we knew the hill was unstable and had the possibility of shifting. Now, the plan is to bring huge trucks and other equipment in to our family neighborhood. No sidewalks exist and children travel to and fro through our neighborhood. Does that seem like a good scenario? And for what?

Technology that will be outdated and obsolete before it is completed! Stop B2H!

earlene lamb
Cell: 541-786-8039

July 27, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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: 2214 East N Av
LaGrande, Or.
97850

References

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

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

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

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

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

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

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

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

August 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

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

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

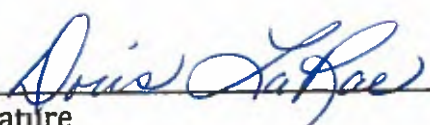
The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require new access and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

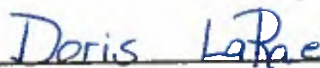
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming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

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

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

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


Signature


Printed Name

Mailing Address: 2214 East N Ave.
LaGrande, Or.
97850

August 5, 2019

Energy Facilities Siting Council
c/o Keilen 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

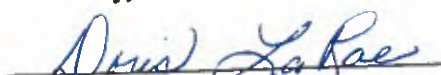
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources 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: Doris LaRae
Mailing Address: 2214 East N Av.
La Grande, Or.
97850

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

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


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

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

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

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

Sincerely,


Signature

Printed Name: Doris LaRae

Mailing Address: 2214 East N Av.
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:

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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.

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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.



Ms. Doris La Rae
2214 E. N. Ave.
La Grande, OR 97850



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

97301-374293



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 1/4 mile of blasting site.

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



Ms. Doris La Rae
2214 E. N. Ave.
La Grande, OR 97850



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

97301-374293





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) greg LARKIN
Mailing Address (mandatory) 59655 MORGAN LAKE ROAD
LA GRANDE ORE 97850
Phone Number (optional) 541 805-1977 Email Address (optional) SLIVERTIP6@YAHOO.COM
Today's Date: 6-20-19

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

Written comments can also be submitted today.

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

Kellen Tardaewether, Senior Siting Analyst
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 94</p> <p>1 \$100,000 in funding for improvements to Morgan Lake to 2 mitigate the impacts on recreation should the Morgan 3 Lake alternative be constructed. Idaho Power has agreed 4 to this condition as well.</p> <p>5 I want to say this again: Please do not 6 interpret the City's willingness to agree to 7 mitigations, that I just meant it as support or 8 acceptance of the project. We remain firmly opposed, 9 firmly opposed to the project for the reasons identified 10 in our 2017 comments of the preliminary application.</p> <p>11 We respectfully ask that EFSC require the 12 mitigation we are seeking in the final order if the 13 project is approved. And while I have only a modicum of 14 the compassion as Peter Barry, just say no.</p> <p>15 HEARING OFFICER WEBSTER: Next, we have 16 Mr. Larkin followed by Sheri Kanig.</p> <p>17 MR. GREG LARKIN: Good evening. My name is 18 Greg Larkin. I reside at 59655 Morgan Lake Road. I 19 live on the top of Morgan Lake Road directly across from 20 the entrance into Morgan Lake.</p> <p>21 The Morgan Lake alternative route of the Idaho 22 Power transmission line would be located approximately 23 120 yards from my residence. I'm in the process of 24 developing my second approved home site on this 25 property, which would be even in a closer location of</p>	<p style="text-align: right;">Page 96</p> <p>1 the wind patterns to different velocities of wind to 2 seek some relief from this, and I've been able to create 3 this type of environment here.</p> <p>4 Now, the facts of this B2H coming through my 5 property, without it being there, can almost put a 6 person a little over the top that way. It affects me 7 every second of every day. It's a 100-pound drill 8 lodged in their back, to characterize it.</p> <p>9 If this transmission line were to go through 10 at this location, I would no longer be able to reside or 11 fulfill my lifetime dreams and goal of living here. And 12 I don't have the time nor the resources or anything else 13 to seek the relief I've sought or the little bit of 14 tranquility to deal with this issue. Well, I will leave 15 it at this, and then I'll address some more issues.</p> <p>16 As far as pertaining to the sound, the static 17 hiss of this line for the peace and tranquility of our 18 lake up there. We have a gas line that goes through, 19 this line and this route will cross this gas line twice. 20 If we have heavy fogs or a rainstorm, that can transmit 21 a spark to the ground and create a fire, the electronic 22 field.</p> <p>23 Again, I'll repeat myself. The health hazards 24 of this to people in this close of proximity. And the 25 deterioration, even in the ground, the potential</p>
<p style="text-align: right;">Page 95</p> <p>1 this transmission line in proximity to it.</p> <p>2 I spent many years as a locomotive engineer 3 for the Union Pacific Railroad. I suffered a permanent 4 disability of hearing loss and tinnitus that forced me 5 away from this career.</p> <p>6 I can read you a screenshot from Wikipedia on 7 tinnitus: "Tinnitus is the hearing of sound with no 8 external sound present. While often described as a 9 ringing, it may also sound like a clicking, hiss or 10 roaring. Rarely, unclear voices or music are heard. 11 The sound may be soft or loud, low pitched or high 12 pitched and appear to be coming from one ear or both. 13 Most of the time, it comes on gradually. In some 14 people, the sound causes depression or anxiety and can 15 interfere with concentration."</p> <p>16 I am real bad in the last 3 years. When I 17 left the railroad in '87, I had a testing in 1985, my 18 ears rang at that time 57 decibels. Approximately 19 10 years ago, one ear was at 72 decibels, the other one 20 was at 75 decibels.</p> <p>21 Now, I have great concerns, and I've been 22 around the transmission lines before where I cannot 23 stand them, and if this is this close to my home. And 24 then to cope with it up there, or to tolerate it, I've 25 done a lot of pruning and thinning of the trees to get</p>	<p style="text-align: right;">Page 97</p> <p>1 deterioration in the ground of this gas pipeline. The 2 technology, I don't know, as it goes over, through this 3 route. It had to. There is no longer a route that was 4 the western route that was on the radar and it's 5 disappeared, it's gone away. And viably the effect on 6 our county here, if that route were to go through in 7 that direction, it would most likely have no less impact 8 on our county here, to the residents.</p> <p>9 I'm not a public speaker. I'll address it 10 further in some written comments. I'll have some 11 assistance on that.</p> <p>12 I thank you for your time.</p> <p>13 HEARING OFFICER WEBSTER: Thank you.</p> <p>14 We have Sheri Kanig, and following we will 15 hear from William Whitaker.</p> <p>16 MS. SHERI KANIG: Good afternoon or evening, 17 everyone. My name is Sheri Kanig, and I reside at 331 18 Southwest Street in Yreka, California. That is located 19 in the Klamath National Forest in Siskiyou County, 20 northern California. I am not a resident of La Grande 21 but a volunteer and a tourist.</p> <p>22 I have been a co-owner of a large logging 23 company in the Klamath National Forest for many years 24 and also participated in fire suppression. I guess my 25 issues today are regarding the fire danger because of</p>

TARDAEWETHER Kellen * ODOE

From: Carol <carol2049@gmail.com>
Sent: Wednesday, August 14, 2019 11:56 AM
To: B2H DPOComments * ODOE
Subject: Impact of B2H on forestland public comment

August 14, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

The applicant significantly understates the impacts to employment and forest lands as a result of the proposed B2H transmission line.

I moved to La Grande over 30 years ago to enjoy its forests and the benefits they bring to the local community. The applicant for the B2H claims the clearing of trees for the powerline corridor will have little impact on forestland and thus, not impact local economies. The applicant gives no evidence or data for calculating the economic impact and experts believe their estimates are unrealistically low. In addition, the applicant claims that landowners will be able to use the cleared land for other agricultural purposes. Again, this is unrealistic. Even if the land were suitable to other purposes (and much of it is not), most landowners would have a significant cost in equipment to convert to another form of agriculture. Removing trees and impacting forest land has an economic impact that is much more significant than the applicant indicates.

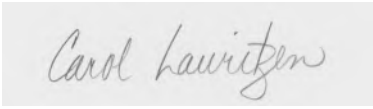
The lives of many people will be negatively affected by the economic impacts of the B2H powerline. It may even lead to a loss of population due to people having to move to support themselves financially. Even for those who stay, the loss of trees will have many negative effects.

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.



A rectangular box containing a handwritten signature in cursive script that reads "Carol Lauritzen".

printed name: Carol Lauritzen

mailing address: 801 O Avenue, La Grande, OR 97850

email address; phone (optional): carol2049@gmail.com

RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
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email: B2H.DPOComments@Oregon.gov

OAR 340-035-0035
OAR 340-035-0100
World Health Organization

The draft site certificate would result in ODOE and the Energy Facility Siting Council exceeding their authority by using a procedure that allows them to approve exceedances of the noise limits. The action of allowing this impact absent landowner agreement is by definition a government "taking" of private property.

OAR 340-035-0035(l)(b)(B)(i) states: "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-----as measured at an appropriate measurement point-----"

The Oregon Department of Energy and Energy Facility Siting Council are proposing to be able to allow noise levels exceeding the requirements of DEQ over the objection of the landowner. The impacted landowners are not located within the Right of Way and thus are not subject to an order to allow eminent domain actions. The process proposed for taking action on noise complaints deny the impacted public an opportunity to object if the developer acts upon ODOE and the EFSC allowing them to exceed the noise standard. The decision process included in the draft proposed order allows the developer to obtain approval for taking or not taking action to the Oregon Department of Energy. This action would occur after a site certificate has been issued and the contested case and appeal timeframes have expired. See site certificate Condition 1 and 2 on pages 554 through 555.


The action of allowing an exception in the first place is not justified and will not make the development unpermittable. The developer has rejected multiple line variations which would avoid the highly populated areas. In addition, the developer has dismissed the option of burying the line to address impacts.

I object to the procedure in the draft proposed order for responding to noise complaints. This procedure would allow the Oregon Department of Energy to allow exceptions to the noise standard or ignore noise exceedances which is specifically prohibited under state law. Decisions would be made after a site certificate is issued, and in the event the Department of Energy were to allow an exception to the noise standard or develop a plan to authorize action which would not comply with the noise standard, the health and wellbeing of citizens would be jeopardized. In fact, decisions may not occur for several years following the issuance of a site certificate, if one is issued.

No noise exceedances are supposed to be allowed and the procedure being proposed in the Draft Proposed Order does not comply with the statutes or rules relating to noise at previously unused industrial sites. Contrary to the statement on Page 556, Lines 9 through 12, the items in the draft proposed order do not provide for the protection of

health, safety and welfare of Oregon citizens otherwise afforded through compliance with DEQ's noise control regulations.

Absent assurance that citizens will not be exposed to noise exceedances, the site certificate request needs to be denied.

A handwritten signature in black ink, appearing to read "Dexter Lemon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dexter Lemon
68615 - Hill Lay Ln
Union, OR 97883

RECEIVED

AUG 22 2019

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

DEPARTMENT OF ENERGY

Comments regarding the failure of the Draft Proposed Order to control and treat Invasive Weeds resulting from the development and operation of the Boardman to Hemingway Transmission line.

NOXIOUS WEED CONTROL

The applicant has not established a weed control plan that will protect the adjacent farm, wetlands, native habitats and forests from infestations due to the transmission line providing for noxious weed introduction and stimulation.

Failure to control noxious weeds will result in a failure to comply with OAR 345-022-0110 as it will result in significant adverse impacts to the ability of the county and private providers within the analysis area to provide those services.

Additional rules impacted with at least one example of impacts which make the development out of compliance with the rule:

- Failure to comply with both OAR 345-022-0070 and OAR 345-022-0060 due to the negative impact invasive weeds have on the ability of the habitat to support wildlife species due to changes in the types of food available to species and the fact that invasive species clog waterways necessary for threatened and endangered fish.

- Fails to comply with OAR 345-022-0090 due to the fact that invasive weeds push out "first foods" species relied upon by native Americans. (See attachment from the Shoshone-Bannock Tribes, pages 5 and 6 identifying concerns with noxious weeds and the need to address them at all locations impacted by the development, as well as the need for vehicle cleaning)

The current plan fails to comply with the following general rule and statute which apply to the entire siting process:

- Oregon Revised Statute 469.507 requires the site certificate holder to not only establish programs for monitoring the environmental and ecological effects of the construction and operation of the facilities, but also requires the certificate holder to perform testing and sampling necessary for the monitoring program per guidelines established by the EFSC or it's designee.

OAR 345-021-0010(l)(u)(E) Identifies the need for establishing a monitoring program to establish the identification of conditions which impact the providers ability to provide required services. (This statute and rule make it clear that the Department of Energy and EFSC have the authority and obligation to establish in site certificate conditions requirements for monitoring of those programs.)

(Attached comments from the Oregon Department of Fish and Wildlife state the need to address the introduction and spread of noxious weeds during the entire life of the project.)

Facts that support my comments regarding the lack of an effective Noxious Weed Management Plan

Construction and ongoing maintenance of the transmission line will introduce and stimulate the development of multiple noxious weed varieties which pose a threat to public and private property for many miles adjacent to the transmission line. Some seeds disperse for hundreds of miles. A failure to identify and treat noxious weeds prior to

them dispersing seeds onto adjacent properties is a critical component of effective treatment to avoid these impacts. State law contained in ORS 569.390 requires the developer to treat weeds prior to seed dispersal, ORS 569.400 provides penalties for failure to do so and ORS 569.445 requires developer to clean machinery prior to moving it over any public road or movement from one farm to another. The site certificate needs to include a monitoring schedule during the spring and summer periods of rapid growth that will address the actual invasive weeds along the right of way. Since different weeds go to seed from early spring through late fall, in order to meet the requirements of the statute, the monitoring plan must address the life cycle of the weeds potentially present at different locations along the right of way to assure weeds are identified and treated prior to seed dispersal. This would require visual inspections to occur based upon the timeframes for specific weeds to develop (Examples attached for leafy spurge and rush skeletonweed which occur in all counties being crossed by the transmission line indicate flowering and resulting seed dispersal occurs from June through November for just these two invasive weeds.) Counties include these on List A rated as invasive weeds requiring attention.

Idaho Power is not planning to treat noxious weeds within a timeframe that will preclude their spread to adjoining property. They are only planning control measures within the Right of Way and 50 feet beyond the ROW in Malheur County (see Appendix B2-2, Section B2.1.3, are only planning mandatory monitoring for the first 3 years of the project, are suggesting monitoring and treatment once a year and propose no ongoing management activities along roadways.

A failure to manage noxious weeds would result in a significant financial burden being placed upon the county and landowners. Noxious weeds have been identified as the most significant threat to agriculture. In addition, introduction and increased numbers of noxious weeds in critical elk and deer habitat would reduce the value of this habitat to wildlife dependent upon it and result in wildlife fatalities through starvation or displacement to less desirable habitat.

The applicant is planning to manage noxious weeds in a manner that will not keep them from spreading within the county and in critical wildlife habitat, and proposing no mitigation for the negative impacts of the spread of weeds within habitat or on agricultural or forest land.

I am also concerned regarding the fact that the final plan will not be completed until after the site certificate is issued. County Commissioners need to be able to assure the citizens that the final plan provides adequate management of noxious weeds.

Recommended site certificate conditions:

- The revegetation plan will require ongoing inspections of the right of way based upon the types of noxious weeds present and be performed in a timeframe that will allow for treatment prior to seed dispersal.
- The monitoring plan will remain in effect for the life of the project including annual monitoring and treatment necessary to address invasive weeds within the ROW and adjacent land identified in the prior year's study sites as having increased occurrence of invasive weeds compared to control sites.
- The County will be provided a copy of the completed weed management plan for county comment and approval prior to it being accepted as final.
- Two sample plots will be identified in each county outside the right of way at locations within ½ mile of the right of way to be monitored for increased invasive weeds. Two additional sample plots will be identified at distances recommended by the Oregon Department of Agriculture from the transmission line based upon

their expertise regarding a distance that would minimize impacts from the transmission line and in similar habitats as a control. In the event that noxious weed infestations increase at a rate greater than similar areas located in sample plots, Idaho Power will provide funding for County staff, equipment and means to treat the area of increased infestations outside the ROW.

- Increased invasive weeds in the area of seed dispersal determined by the Oregon Department of Agriculture, will be presumed to have occurred as a result of habitat impacts of the development. This includes noxious weeds spread from areas outside the ROW, recreational use, grazing, other construction projects, unless the developer provides convincing evidence that the infestation would have occurred absent the development of the transmission line.
- No plan will be acceptable which fails to comply with state law contained in ORS 569.390, 569.400 and ORS 569.445

I encourage you to address the inadequacies of the weed management plan proposed by the developer. A failure to provide for effective, legal management of invasive weeds will preclude the Oregon Department of Energy and Energy Facility Siting Council approval of the site certificate for this development.

Sincerely,



Dexter Lemon

68615 Hill Lay LN
Union, OR. 97883

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 addresssed in a separate comment.

Mary Jo Lemon
Signature

Name: Mary Jo Lemon

Address: 96 Walnut 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.

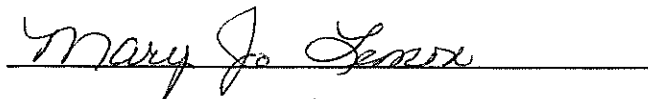
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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



Name: Mary Jo Lemon

Address: 96 Walnut 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:

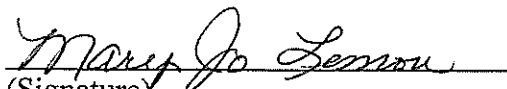
As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with 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.


(Signature)

Name: Mary Jo Lemon

Address 96 Walnut 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 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 addresssed in a separate comment.

Terry Lemon
Signature ✓

Name: TERRY LEMON.

Address: 96 WALNUT 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.

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:

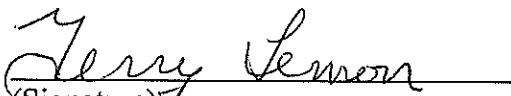
As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with 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.


(Signature)✓

Name: TERRY LEMON

Address 96 WALNUT ST.
LA GRANDE, OR 97850

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

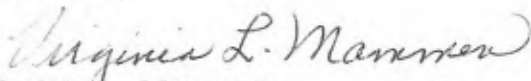
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,


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

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

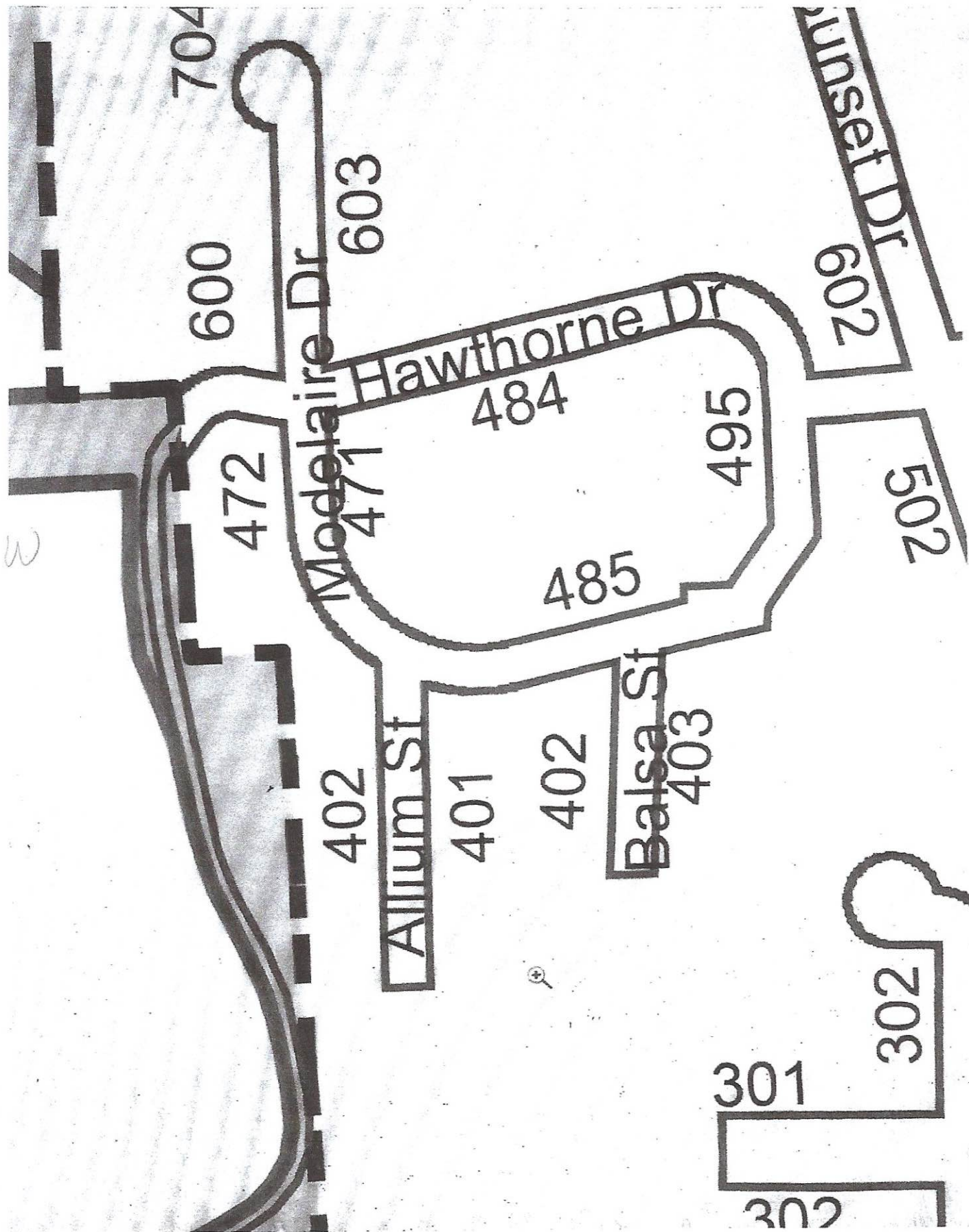
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

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

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

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

N



5

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



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

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

IV. CONCLUSIONS

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

V. ORDER AND CONDITIONS OF APPROVAL

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

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

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

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

Fri, Jul 12, 2019 at 1:51 PM

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

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

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

Kyle Carpenter, PE

Public Works Director

City of La Grande

Public Works

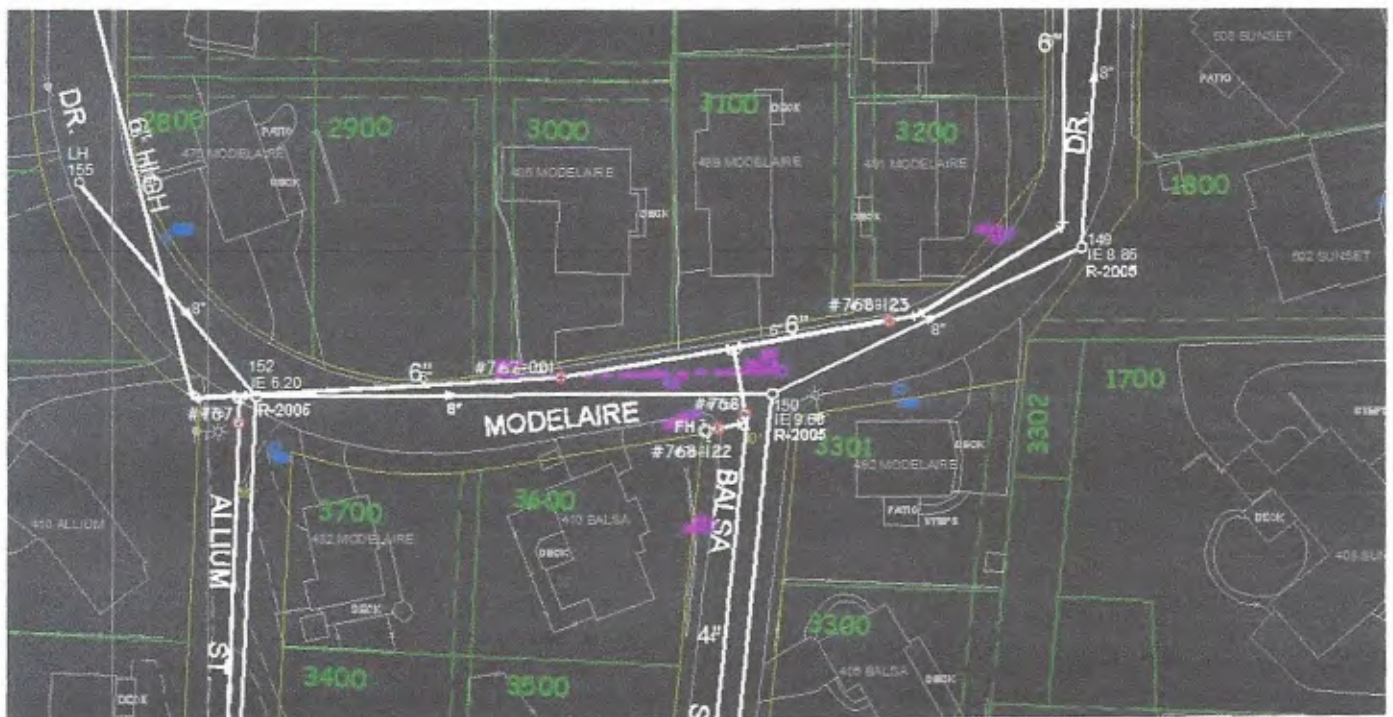
Ph: (541) 962-1325

Fax: (541) 963-4844

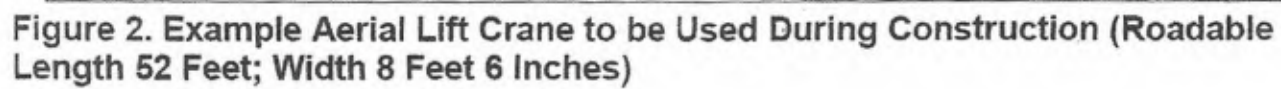
2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K







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

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

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

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

3.1.3 Traffic Related to Timber Removal

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

3.1.4 Impacts to V/C Ratios

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

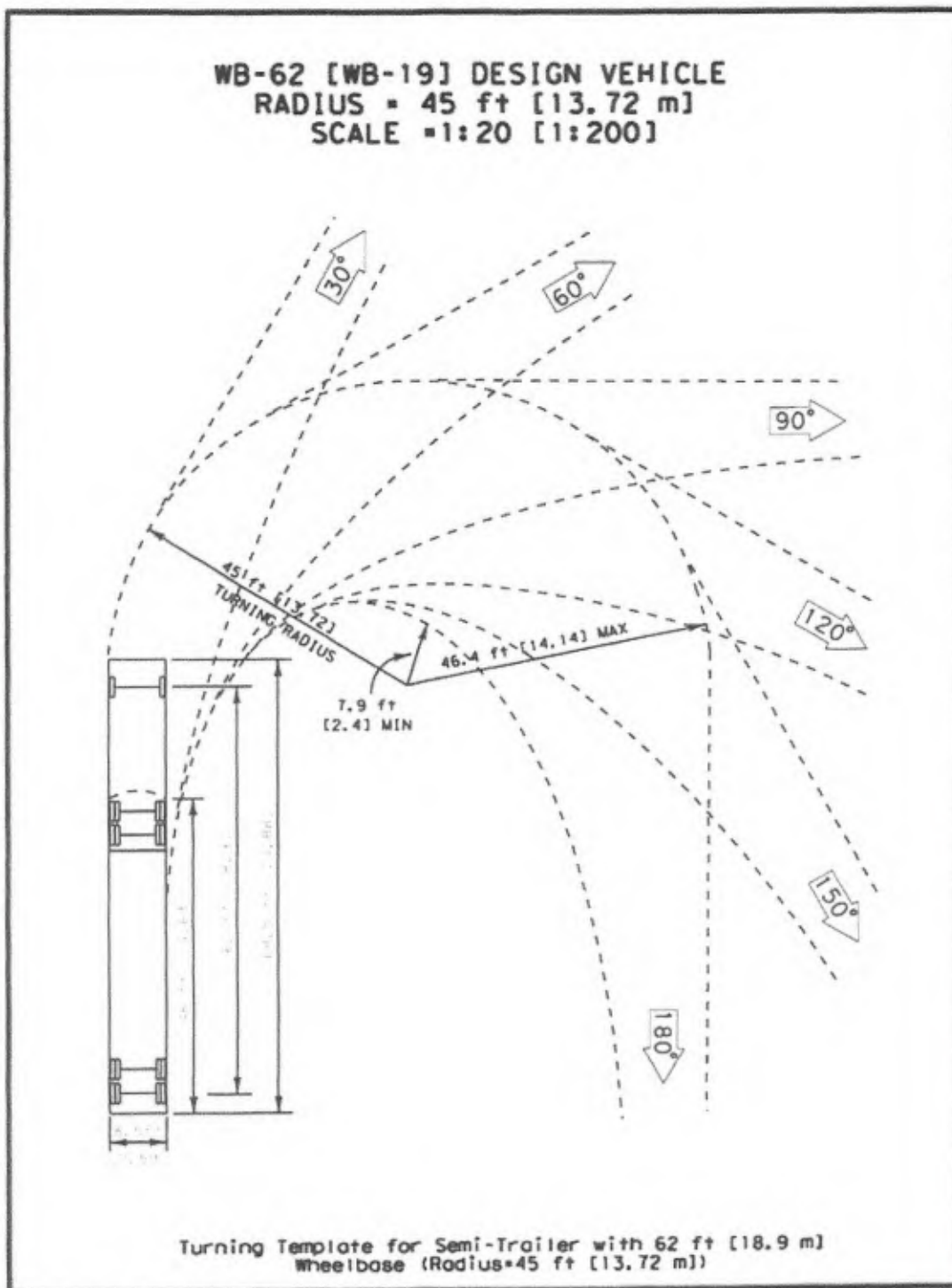
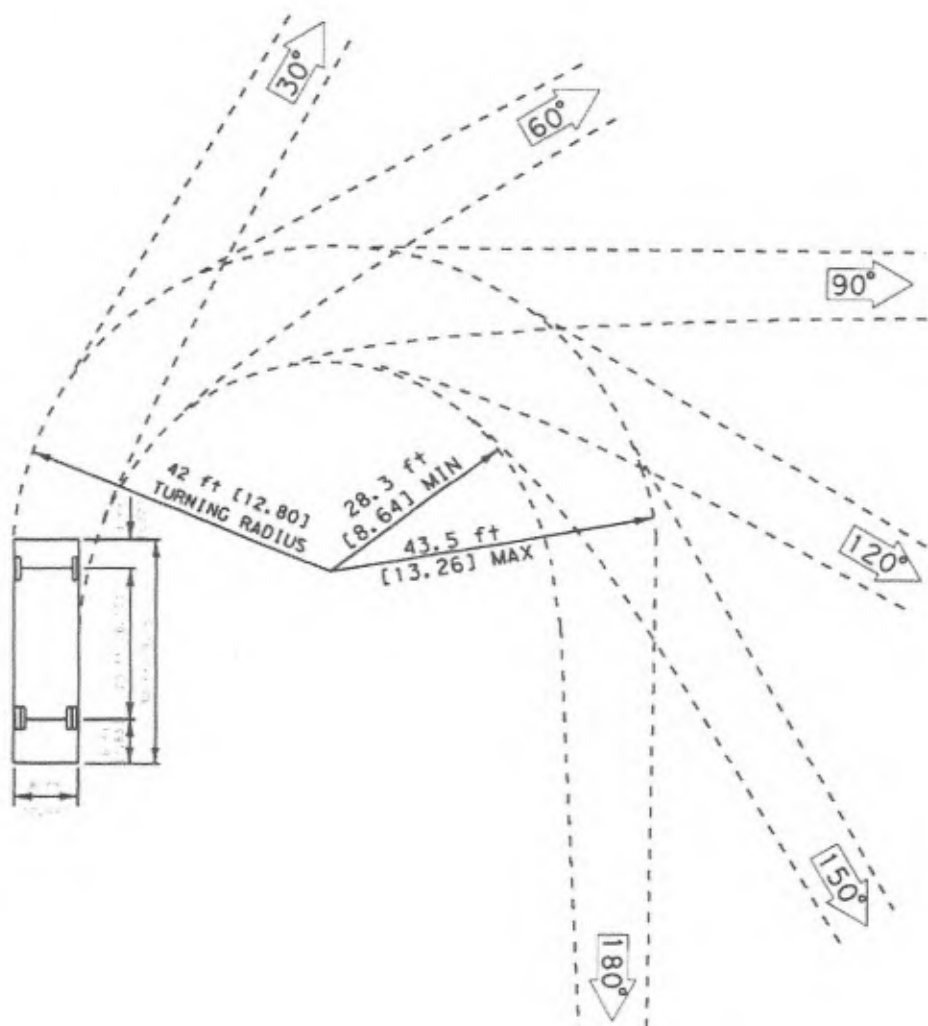


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

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



Turning Template for Single Unit Trucks or Buses

Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

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

Section 3. DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

Section 17. TRUCK ROUTES

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

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

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

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

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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

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Jessie Huxell
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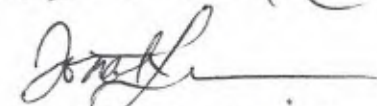

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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community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

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John Barlitz


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SIGNATURE 
PRINTED NAME Andrea Galzow
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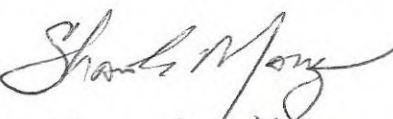
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SIGNATURE: 

PRINTED NAME Shawn K. Mangum

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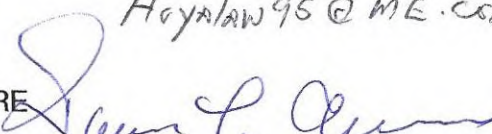
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EMAIL

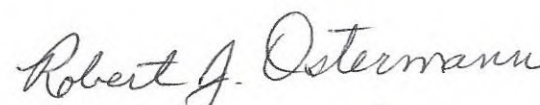

Linda Snyder
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Robert J. Ostermann
495 Modelaire Dr. La Grande, OR 97850

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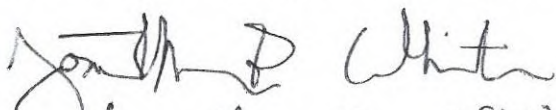
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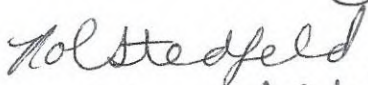
ADDRESS


EMAIL

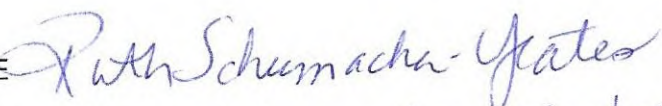

Robin J. Ostermann
495 Modelaire Dr La Grande, OR 97850

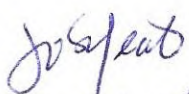
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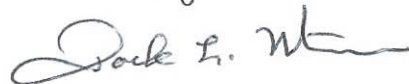
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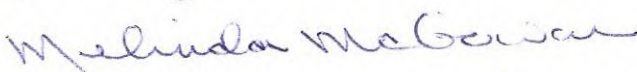
ADDRESS 1509 MADISON AVE LaGrande, OR 97850


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PRINTED NAME Laura Elly Hudson
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SIGNATURE *Robert J. Sherer*
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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SIGNATURE *Merle E. Comfort*
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SIGNATURE *Caroline Kaye Juniper*
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EMAIL

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SIGNATURE

Gerald D. Juniper

PRINTED NAME *Gerald Darwin Juniper*

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

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

SIGNATURE

PRINTED NAME

ADDRESS

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PRINTED NAME

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PRINTED NAME

ADDRESS

EMAIL

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

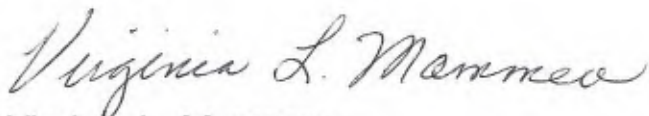
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less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

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

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

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

Sincerely,

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

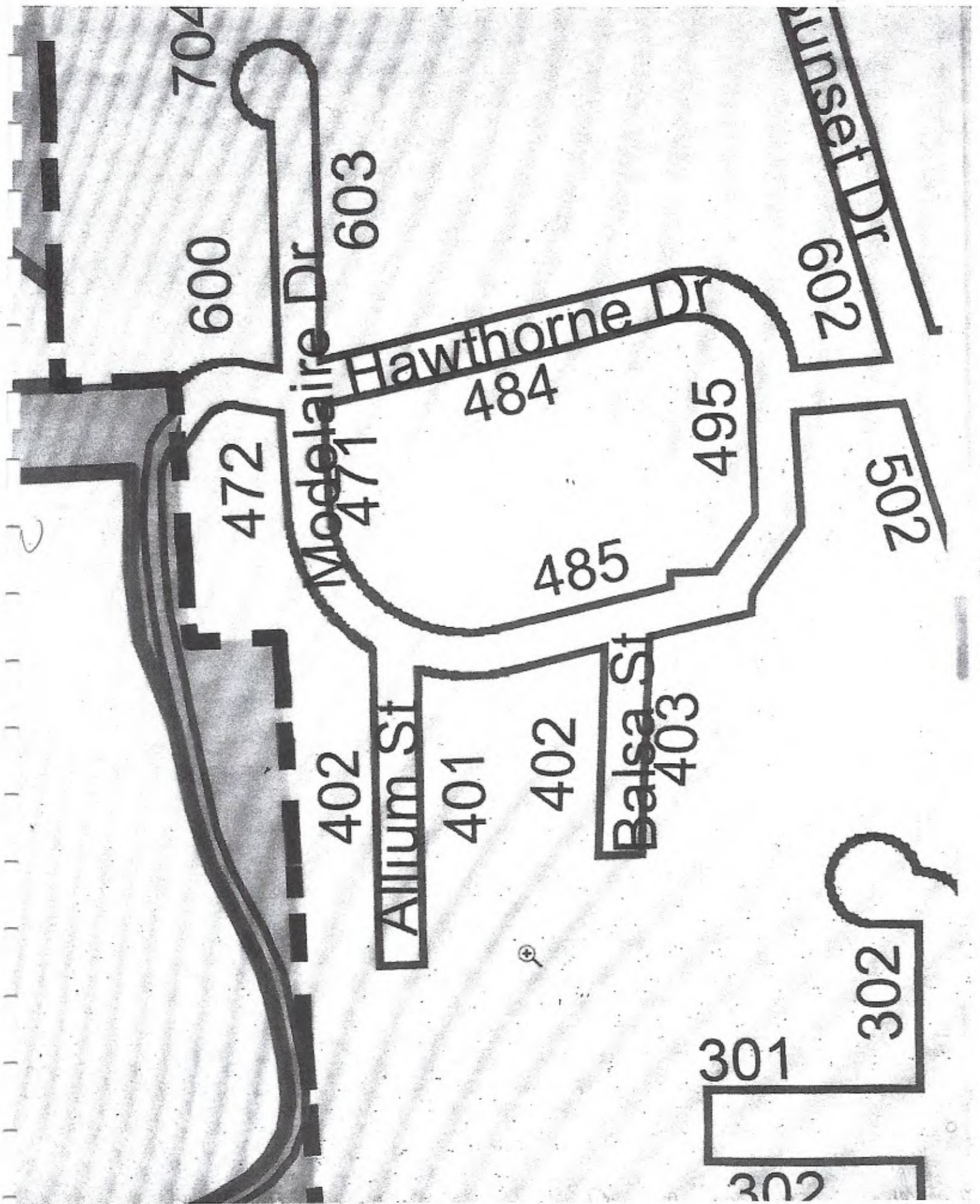
Virginia L. Mammen

405 Balsa

La Grande, Oregon 97850

gmammen@eoni.com

N



3.3 Predicted Noise Levels

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

3.3.1 Construction Noise

3.3.1.1 Predicted Construction Noise Levels

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

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

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

Blasting and Rock Breaking

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

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

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

Implosive Devices

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

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



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Department of Environmental Quality

Chapter 340

Division 35

NOISE CONTROL REGULATIONS

340-035-0035

Noise Control Regulations for Industry and Commerce

(1) Standards and Regulations:

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

(b) New Noise Sources:

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

(B) New Sources Located on Previously Unused Site:

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

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

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

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

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

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

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

(3) Measurement:

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

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

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

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

(4) Monitoring and Reporting:

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

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

(A) Access to the site;

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

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

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

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

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

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

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

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

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

(g) Sounds that originate on construction sites.

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

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

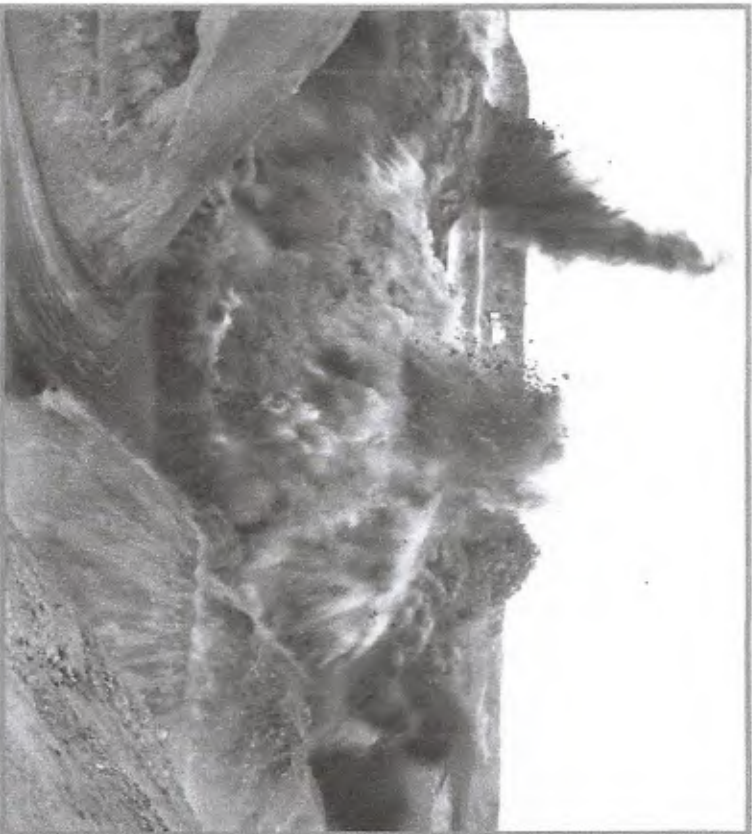
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal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

Controlling the Adverse Effects of Blasting

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

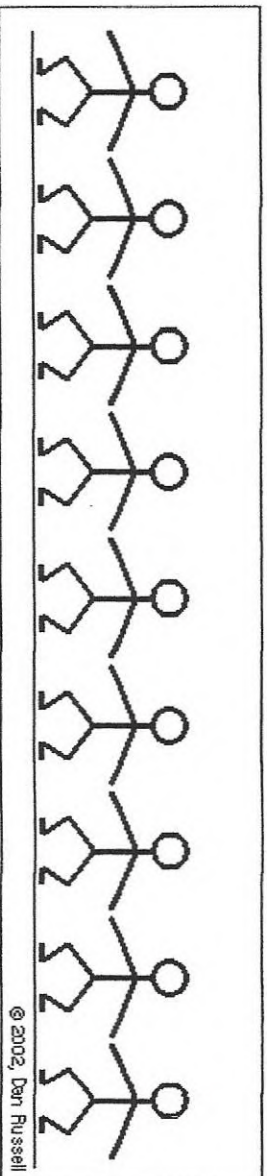
- vibrations,
- airblast, and
- flyrock.

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



Part I: Ground Vibrations, Airblast, and Flyrock

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



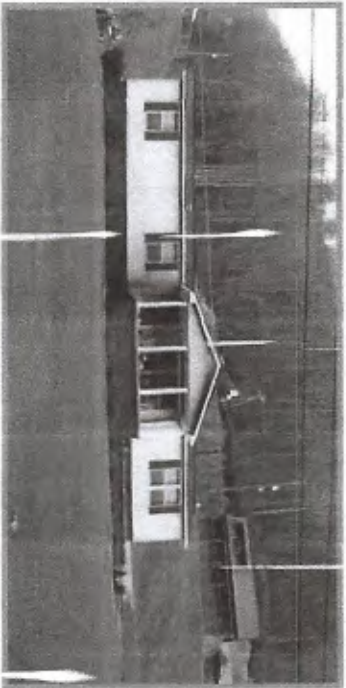
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

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

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

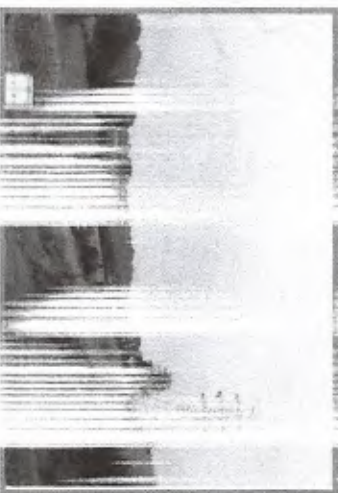
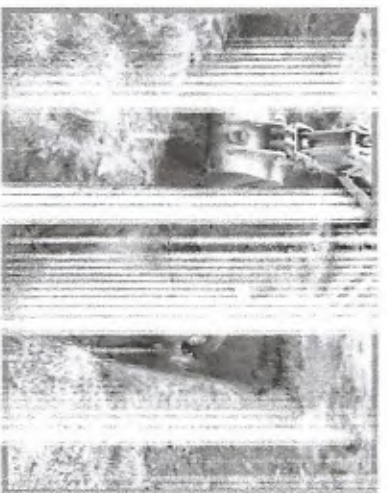
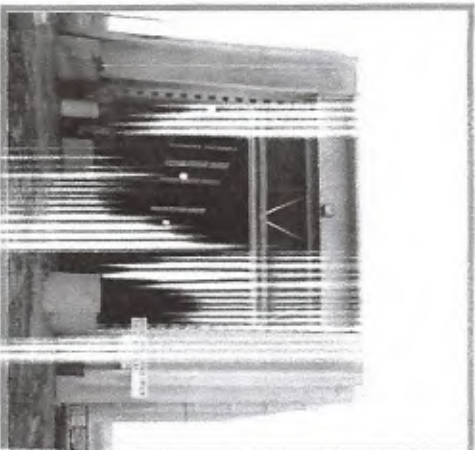
Blasting Impacts on Structures

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



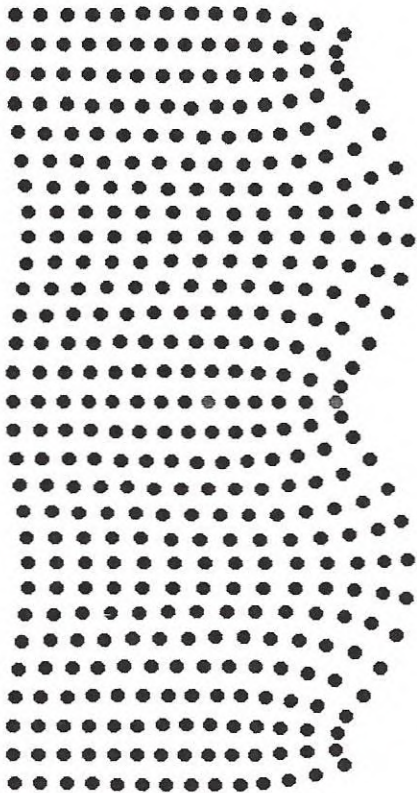
It is important to understand:

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



Ground Vibrations

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



©1999, Daniel A. Russell

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

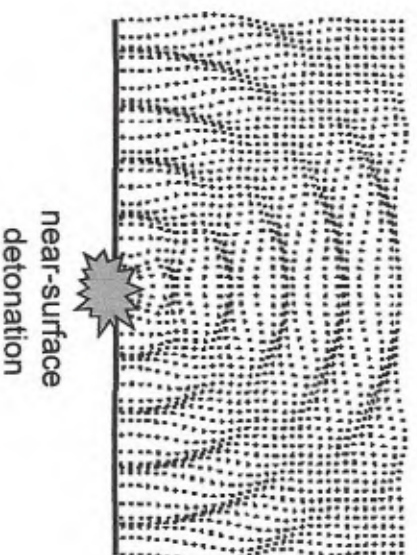
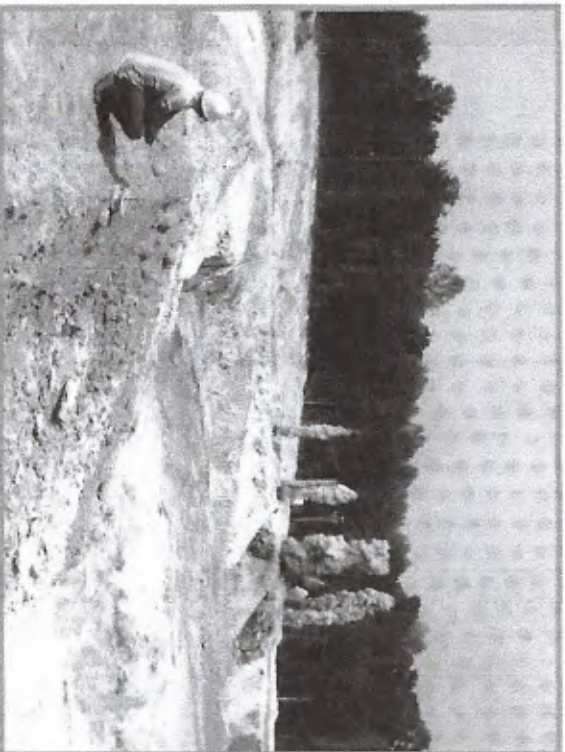
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

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

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

Exhibit 7



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

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

Structure Response

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

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

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

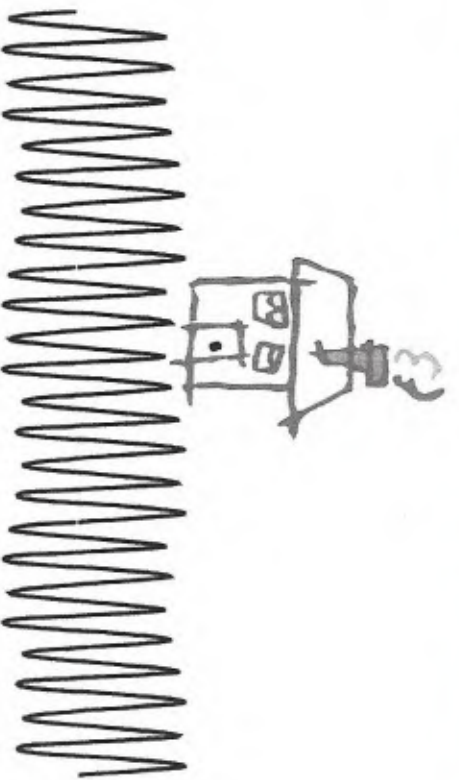
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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



Ground Vibration Structure Response

Exhibit 59



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

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



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HEALTH

LICENSING

Harvard Men's Health Watch

A noisy problem

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

Published: March, 2019



Image: © Juanmonino/Getty Images

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

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

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

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Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

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

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

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

The Sounds of a Hospital

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

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

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

The Research on Noise, Quiet, and Healing

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

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

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

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

How We Address Noise at the UVM Medical Center

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

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

How you can help us.

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

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Dangerous Decibels: Hospital Noise More Than a Nuisance

By Diane Sparacino, Staff Writer

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

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

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



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

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

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

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

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

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

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

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

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

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

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Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

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

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

Symptoms

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

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

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



Fear

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

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

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

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PMID: [24009598](https://pubmed.ncbi.nlm.nih.gov/24009598/)

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

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Abstract

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

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

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

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

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

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

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

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

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

September 5, 2018

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



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

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

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

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

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

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

Where to begin?

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

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

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

Avoidance versus learning to cope

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

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

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

Tackling one fear at a time

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

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

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

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

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

Graded exposure

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

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

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

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

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

60
Shares

Additional Resources & Tools

EXPERT OPINION

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

EXPERT OPINION

[Parents Seek Help
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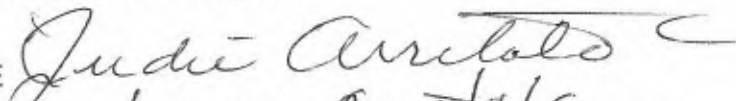


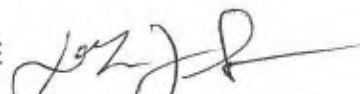
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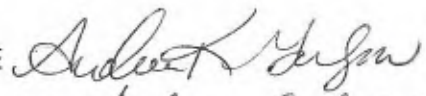
EXPERT OPINION


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


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

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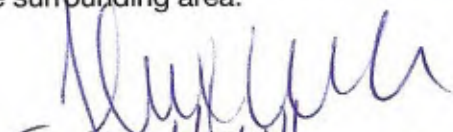
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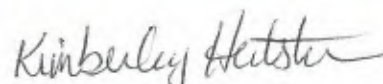
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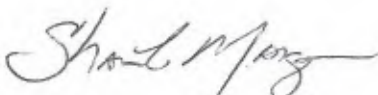
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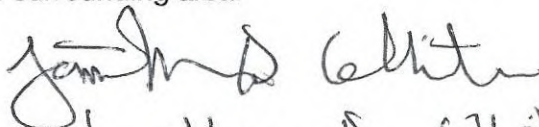
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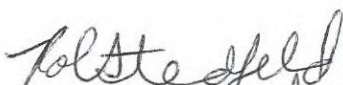
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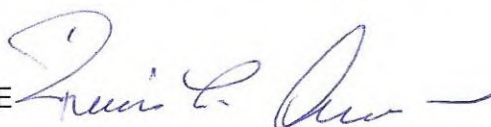
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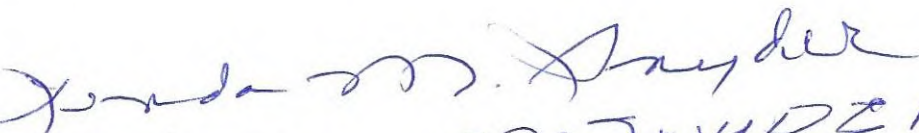
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TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

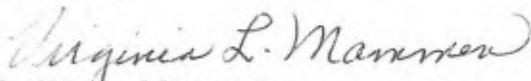
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,


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

gmammen@eoni.com

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

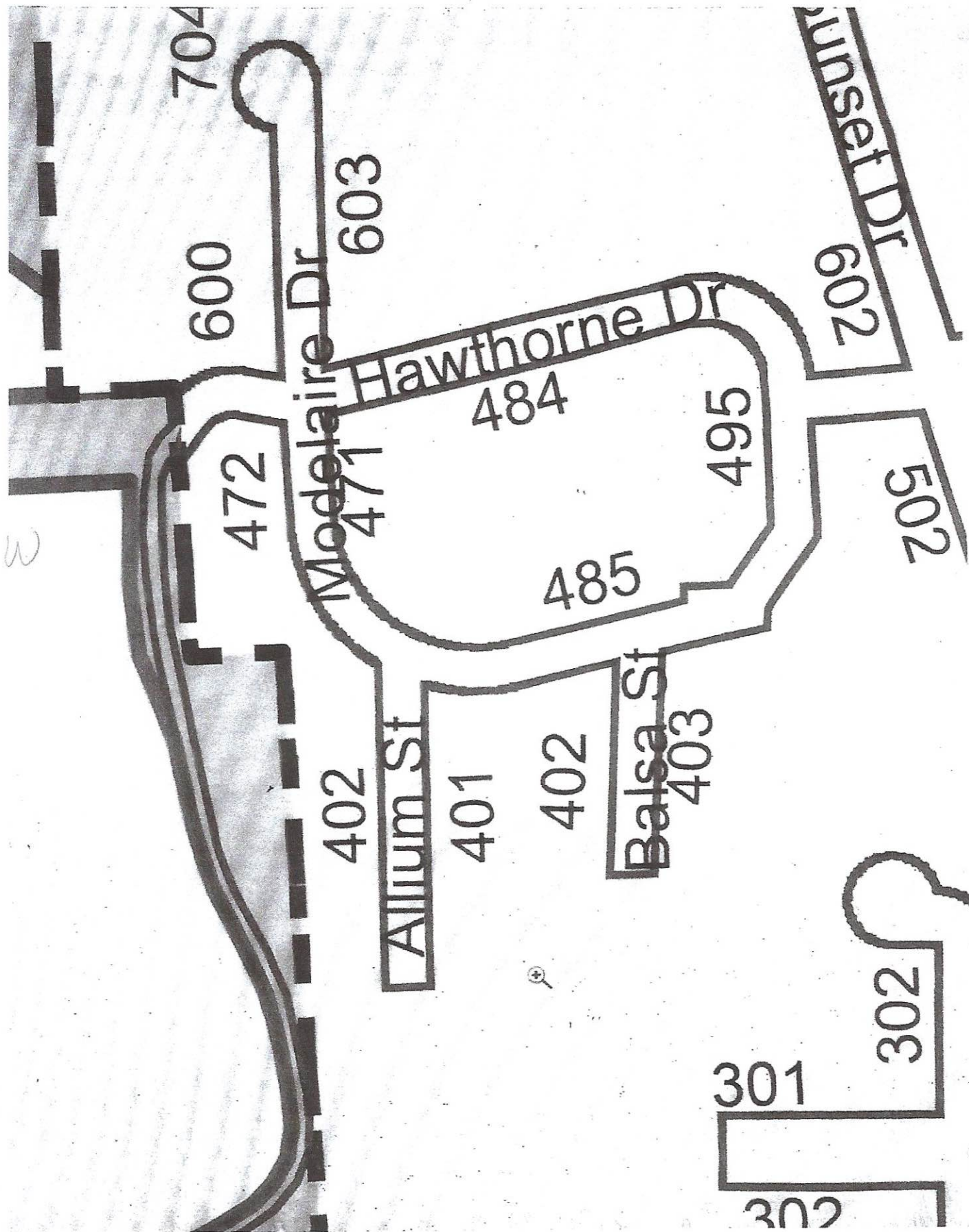
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

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

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

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

N



Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



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

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

IV. CONCLUSIONS

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

V. ORDER AND CONDITIONS OF APPROVAL

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

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

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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



Virginia Mammen <4gmammen@gmail.com>

Modelaire Roadway Specifications

3 messages

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

Fri, Jul 12, 2019 at 1:51 PM

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

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

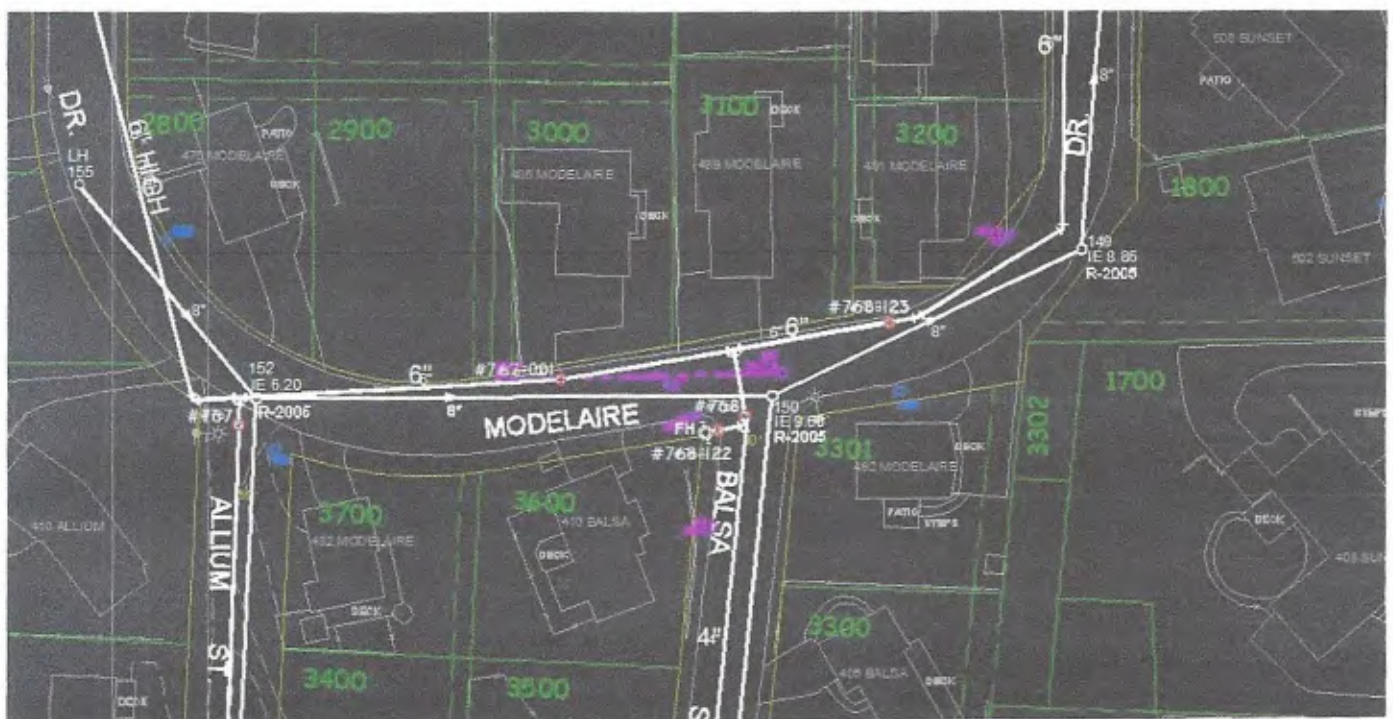
Let me know if there are any other specifications of these roadways that you are interested in that I have missed. Have a great weekend and thanks for the treats, the guys were very appreciative.

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

2 attachments

Hawthorne.jpg
150K

Modelaire.jpg
120K





attachment U2

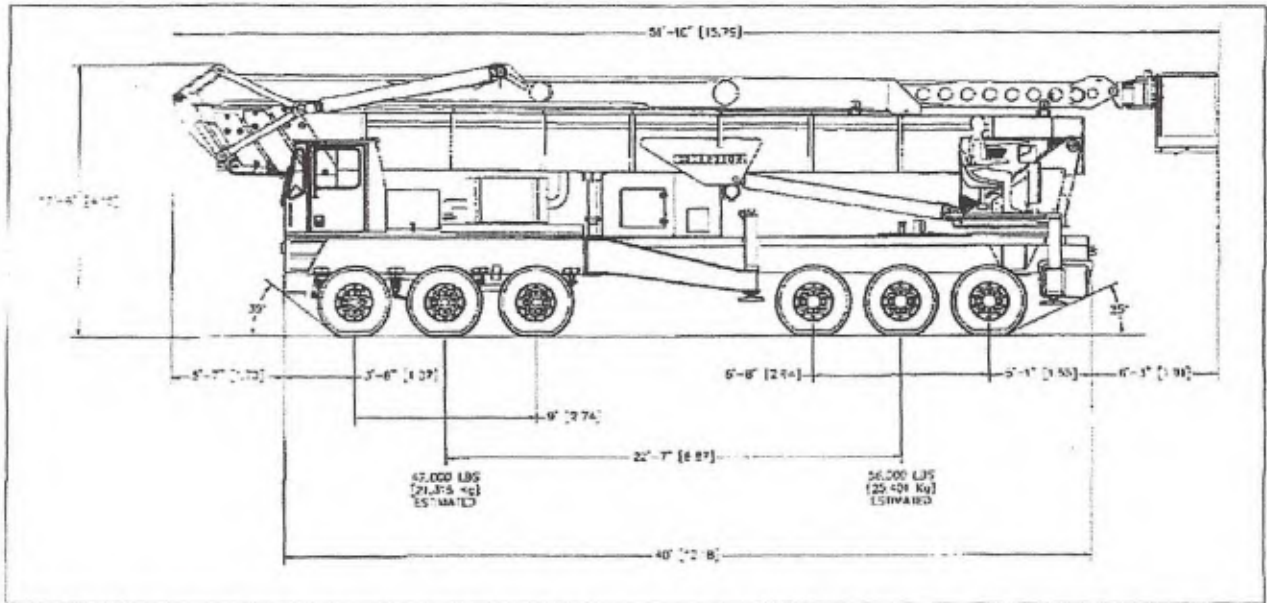


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

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

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

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

3.1.3 Traffic Related to Timber Removal

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

3.1.4 Impacts to V/C Ratios

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

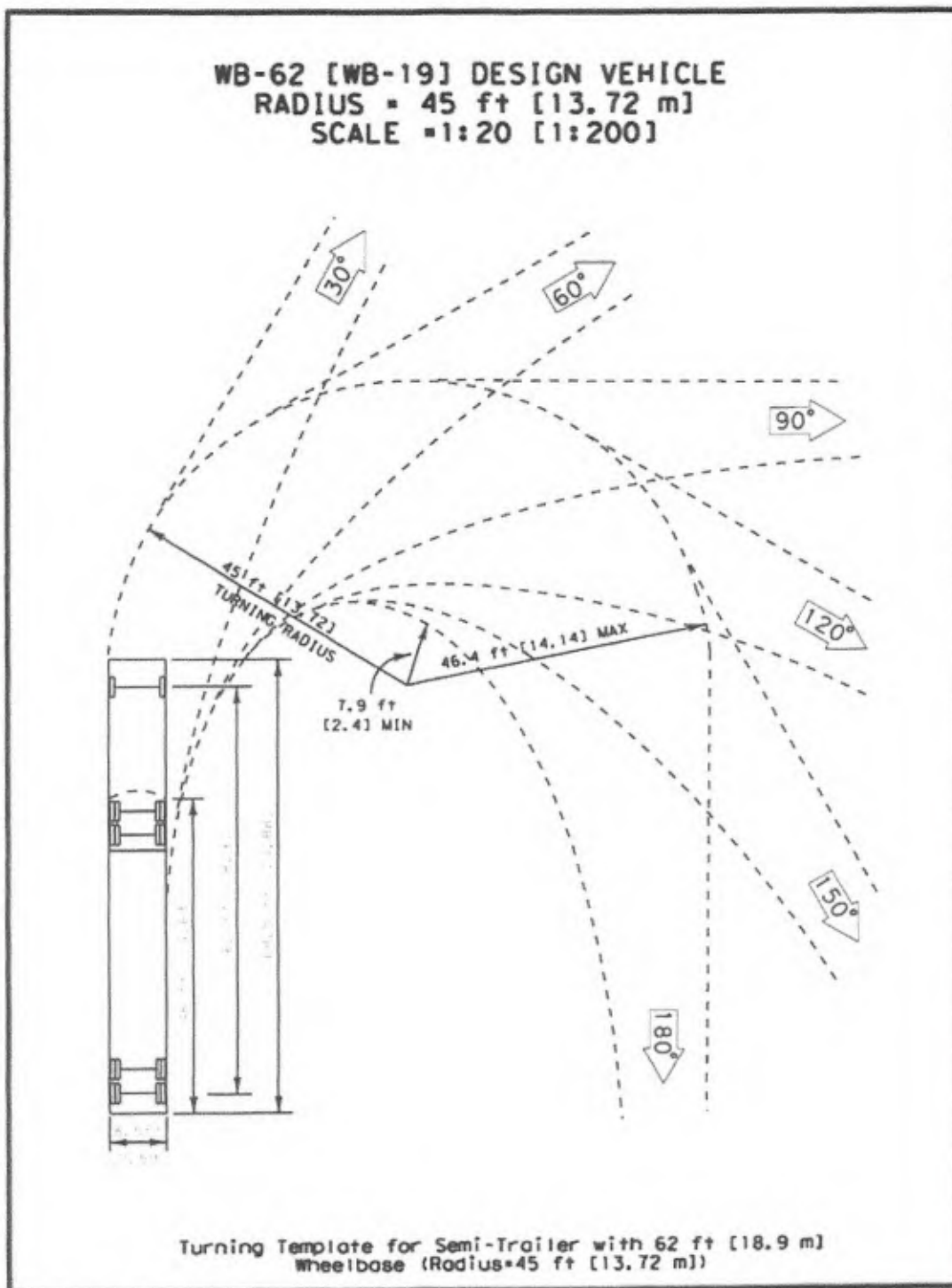
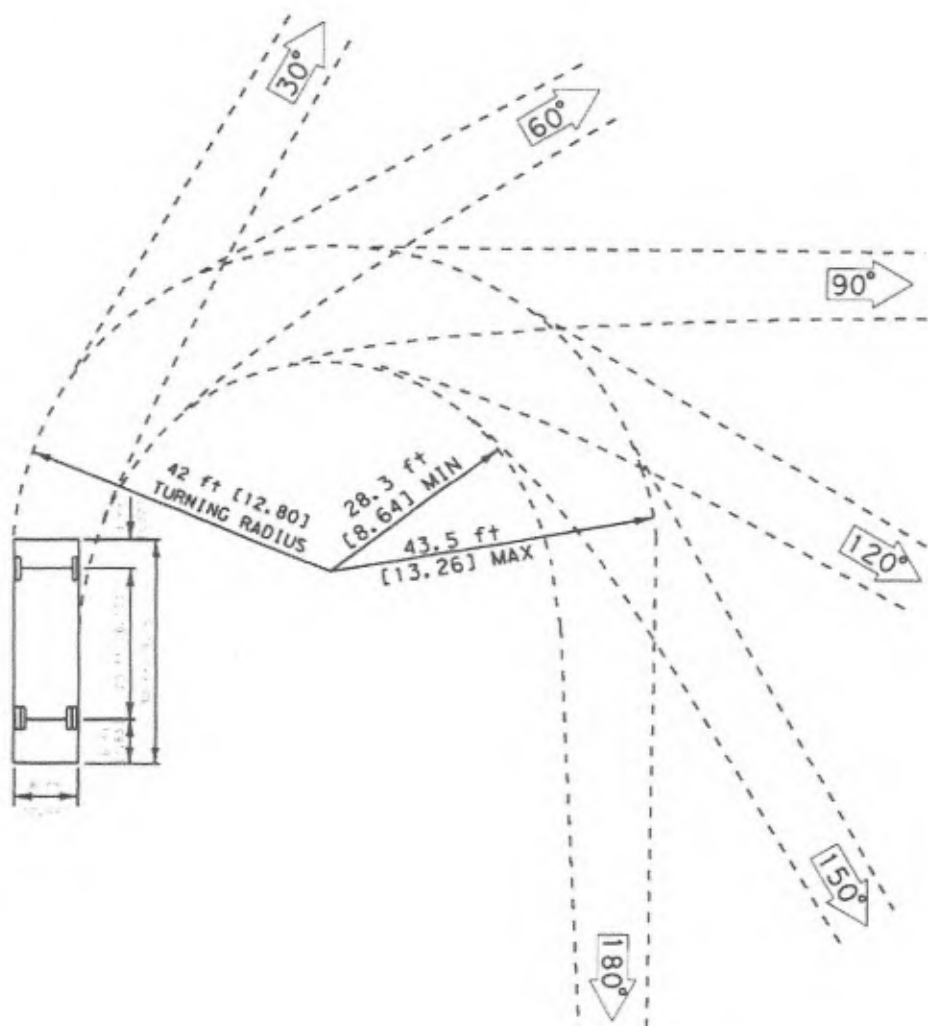


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

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



Turning Template for Single Unit Trucks or Buses

Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

Section 2. APPLICABILITY OF STATE TRAFFIC LAWS.

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

Section 3. DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

Section 17. TRUCK ROUTES

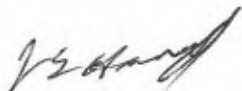
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

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

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

SIGNATURE



PRINTED NAME

James E. Howell II

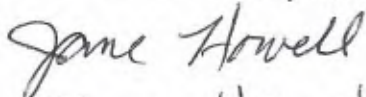
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Jane Howell

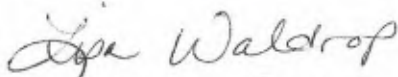
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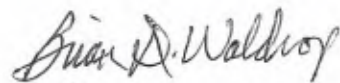
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BRIAN D. WALDROP

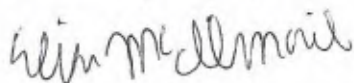
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SIGNATURE

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ADDRESS

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Jessie Huxell
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PRINTED NAME

ADDRESS

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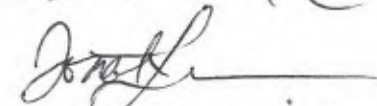

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D. Dale Mammen

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PRINTED NAME


John Garutz


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SIGNATURE 
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PRINTED NAME Shawn K. Mangum

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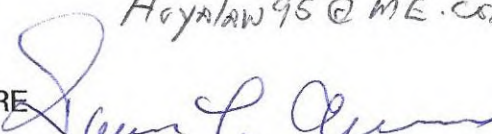
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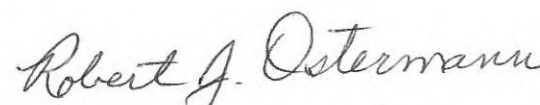

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Robert J. Ostermann
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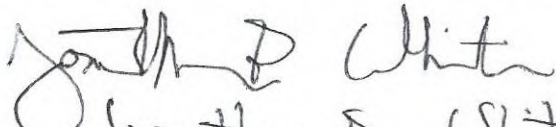
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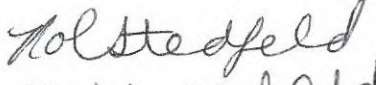
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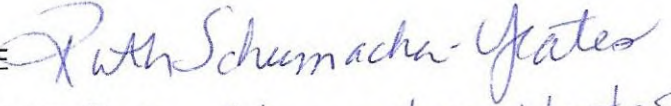

Robin J. Ostermann
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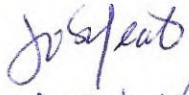
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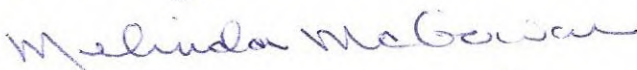
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Angela Sherer

PRINTED NAME

ANGELA Sherer

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SIGNATURE
PRINTED NAME
ADDRESS
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SIGNATURE *Merle E. Comfort*
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PRINTED NAME Caroline Kaye Juniper
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EMAIL

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Gerald D. Juniper

PRINTED NAME *Gerald Darwin Juniper*

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PRINTED NAME

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From: Meredee Lloyd <bluemtnchickadee@gmail.com>
Sent: Wednesday, August 21, 2019 10:48 PM
To: B2H DPOComments * ODOE
Subject: B2H comment

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 this La Grande city park itself and severely underestimates the permanent impact of development on this unique park. See OAR 345-021-0010 (1) (T) (A) (B) (D) & OAR 345-022-0100

Morgan Lake Park is an important landscape 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."

Unfortunately, the report of Morgan Lake Park reveals major inaccuracies and false assumptions about the nature of this city park, thus putting into question of any "extensive work in the siting study of Morgan Lake Alternative". On page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, developed with primitive campsites and fishing docks. In reality, 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 and covers 27 acres. In their application, Idaho Power omits any references to Twin Lake. Twin Lake is undeveloped, a wildlife and bird sanctuary, an important stopover for migrating water fowl, and home to nesting bald eagles.

Page 156, (T-4-6) purports to be a map of Morgan Lake Park, but the map legend only has a purple cross hatch covering Morgan Lake, while leaving the rest of the park unaccounted for. The park is much more than this body of water. Twin Lake and the surrounding land that also is the Morgan Lake City Park, totals 204 acres, and is left unmarked on this map.

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.

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 of essentially "forever". 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. The advances of renewable and distributed energy systems are making B2H obsolete before the possibility of it ever being built. 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 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.

I urge the Commission to deny this application for a site certificate. Idaho Power has yet to provide credible evidence to support each of its conclusions of "no significant impact". Furthermore, the financial risk and burden this project will place on the public is beyond measure.

Signature

Name: Meredee Lloyd

Mailing Address: 604 3rd St., La Grande, OR 97850

From: Courtney Loomis <lynx@eoni.com>
Sent: Thursday, August 22, 2019 10:51 AM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for Boardman to Hemingway Transmission Project
Attachments: b2h_comments_loomis.pdf

2019 August 22

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

Dear Chair Beyeler and Members of the Council:

This is in regards to the Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018, Draft Proposed Order 5/23/2019.

I have been a resident of the Grande Ronde Valley for over 19 years. I moved here for retirement because of the incredible scenic beauty of the area and because of the strong presence of the cultural arts in La Grande. EOU theater and music performances, the Eastern Oregon Film Festival, the Ladd Marsh Bird Festival, and other events that make this valley a wonderful place to live.

The Grande Ronde Valley is an agricultural valley, and while there are some substantial industrial installations near to La Grande, the valley is aesthetically gorgeous and an inviting place to call home. In many ways La Grande reminds me of other towns in Oregon that draw tourists and residents because of their beauty and quality of life, towns such as Sisters, Ashland, Joseph, and other towns that care about the livability assets of their community.

In searching for a route for a major power line corridor, the Bureau of Land Management carefully considered various route options and selected the "Glass Hill Alt" route as having the best balance between minimal environmental impact and serving the need for a power line corridor. Idaho Power chose to ignore that recommendation and is applying for a Site Certificate to build the power lines on a route, the "Mill Creek" route, that would have a destructive impact on the town of La Grande and the Grande Ronde Valley in general.

I assume that Idaho Power chose this route because they would save money relative to the recommended Glass Hill Alt routing. However, there is a huge external cost with the Mill Creek route, and that cost would be borne by the people and local governments of the Grande Ronde Valley, an ongoing cost that would be paid by current residents and future residents forever.

The Mill Creek route would permanently damage the aesthetic qualities of the valley, which over time will reduce property values and property tax revenues. The Mill Creek routing will also reduce La Grande's attractiveness to businesses that offer high-paying jobs, where quality of life is an essential selling point for attracting highly skilled and professional labor. La Grande is well positioned to continue to increase the amount of tourism to the area, with its strategic location on a major transportation route (I-84) and the ongoing increase in the presence of cultural arts and events.

The drawing power of the Grande Ronde Valley to tourists and to high-paying businesses would be severely and permanently damaged by having a huge industrial installation (the transmission lines of the Mill Creek route) that would deeply scar the landscape view across the entire valley. These power lines would be a statement to all visitors that La Grande is an industrial town that has no regard for its own intrinsic beauty.

There are many people currently living in a location that is near to the Mill Creek routing; these people would be paying a huge personal cost with the inevitable drop in resale value of their homes, not to mention the loss of the beauty of the viewshed of their homes for as long as they live there. Many people in the Grande Ronde Valley have held their homes in the family for generations; it is unacceptable to impose the blight of these power lines upon long-term residents and their future generations.

The Energy Facilities Siting Council should prevent the disaster of the Mill Creek power line corridor for the current and future residents of the Grande Ronde Valley, and must deny the Site Certificate that is being sought by Idaho Power.

Courtney Loomis
65155 Grays Corner Rd
Cove, OR 97824

e-mail: lynx@eoni.com
phone: 971-300-4112

2019 August 22

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