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## TARDAEWETHER Kellen \* ODOE

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**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” <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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.” <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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.” <sup>5</sup>

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

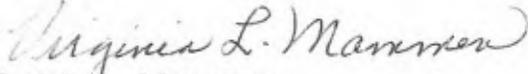
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

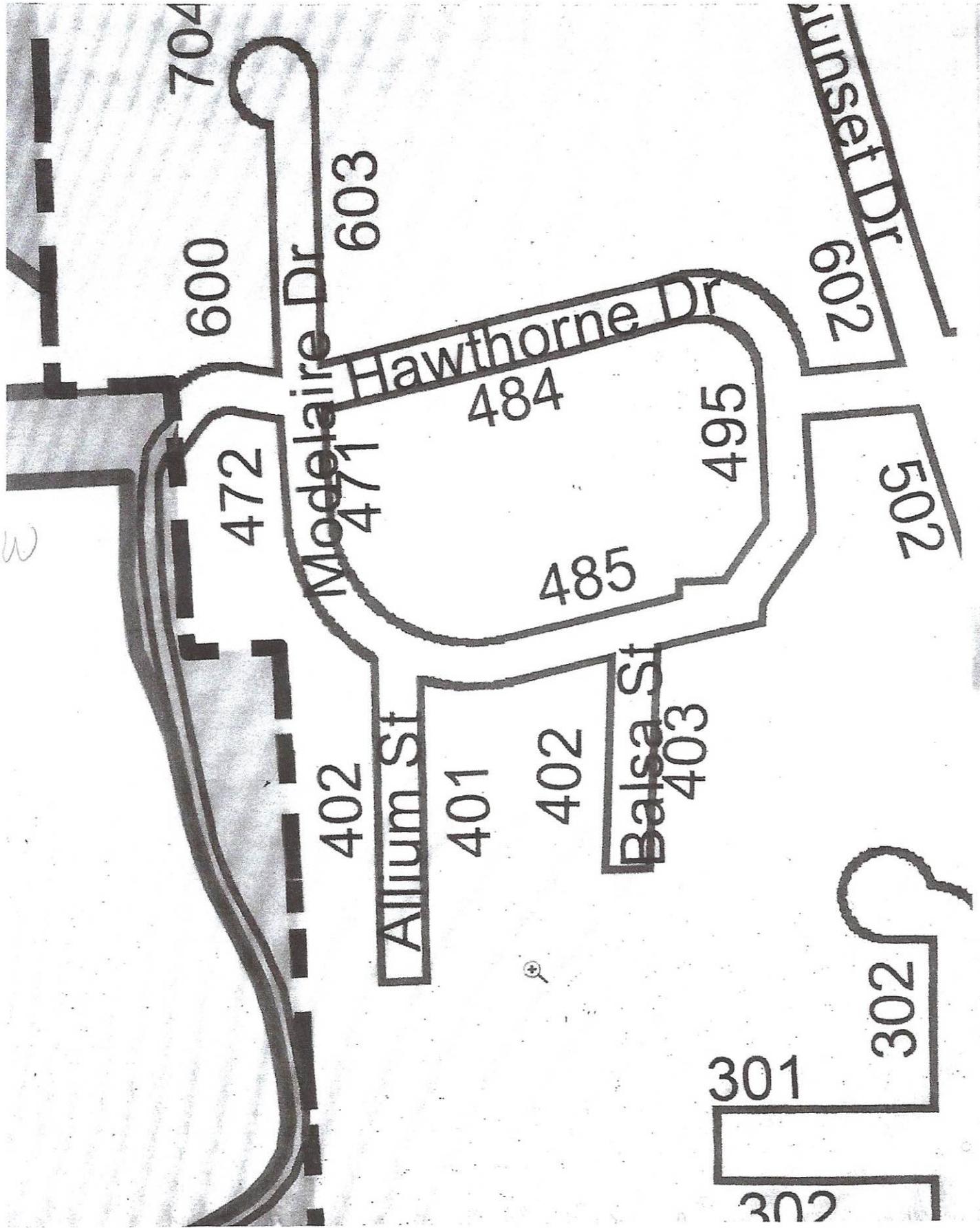
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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.

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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](http://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

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>proposed heliport is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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.

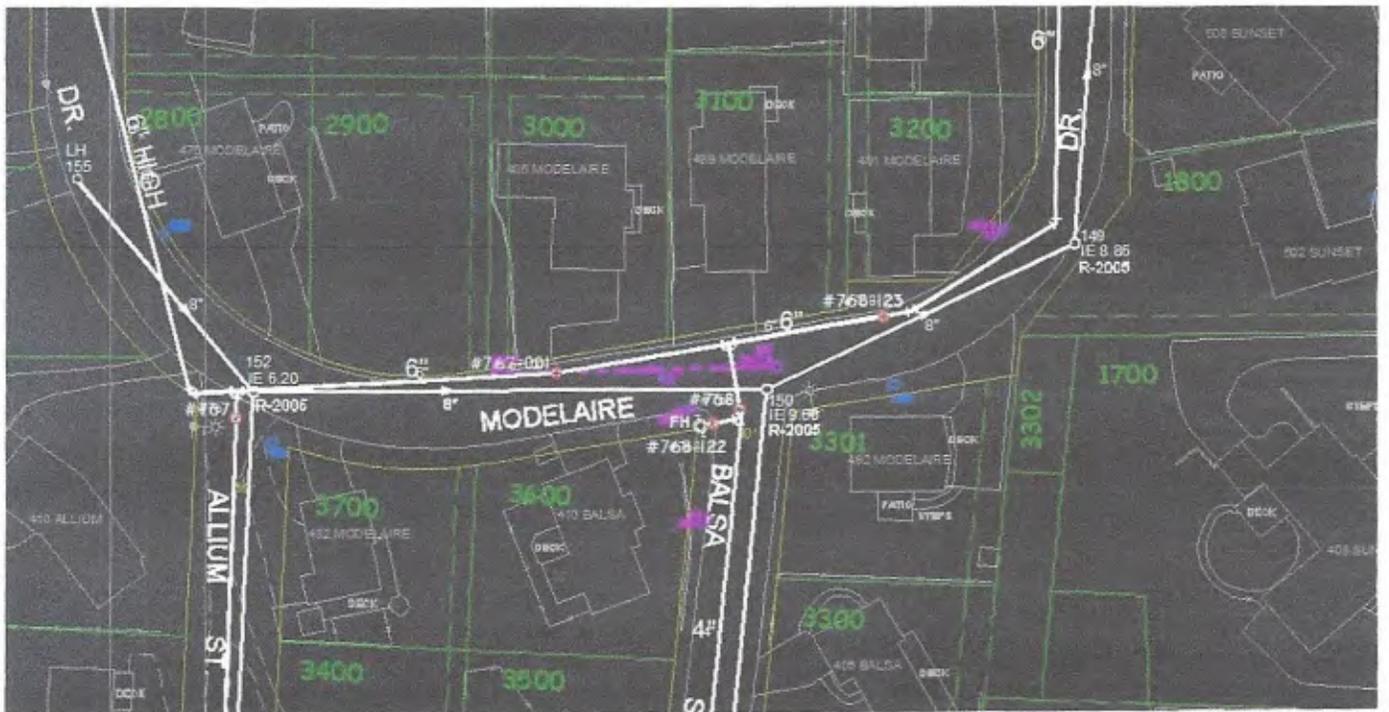
*Kyle Carpenter, PE*  
**Public Works Director**  
**City of La Grande**  
**Public Works**  
 Ph: (541) 962-1325  
 Fax: (541) 963-4844

2 attachments



Hawthorne.jpg  
150K

Modelaire.jpg  
120K





attachment U2

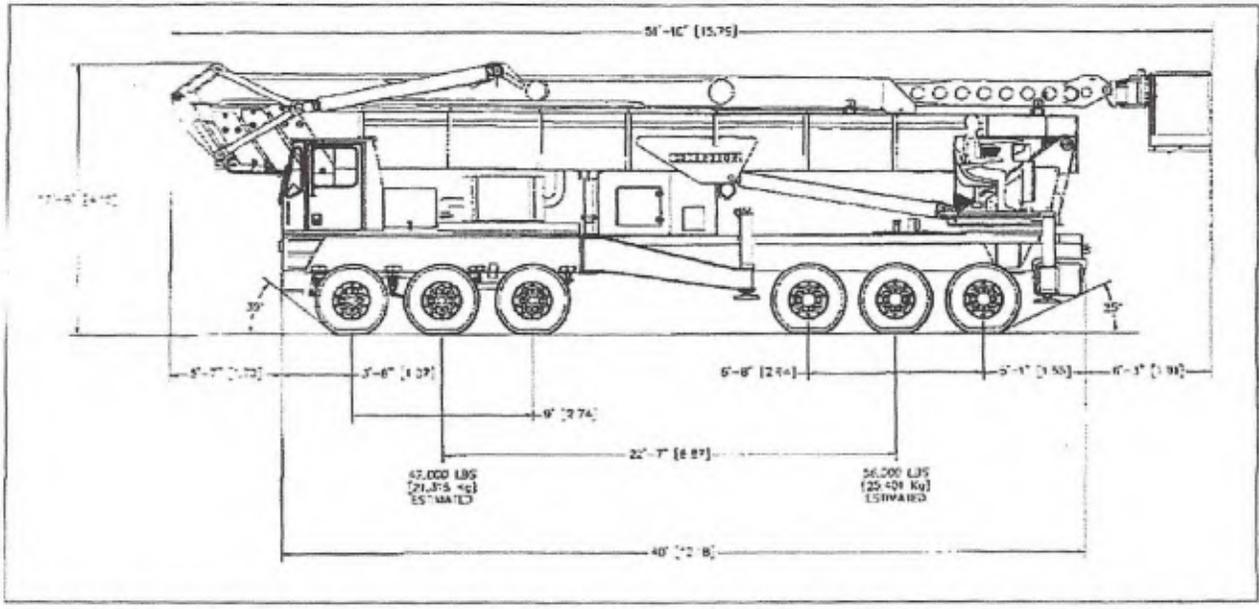


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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 tips 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
<b>Totals</b>	—	—	<b>620</b>	—	—	<b>188</b>

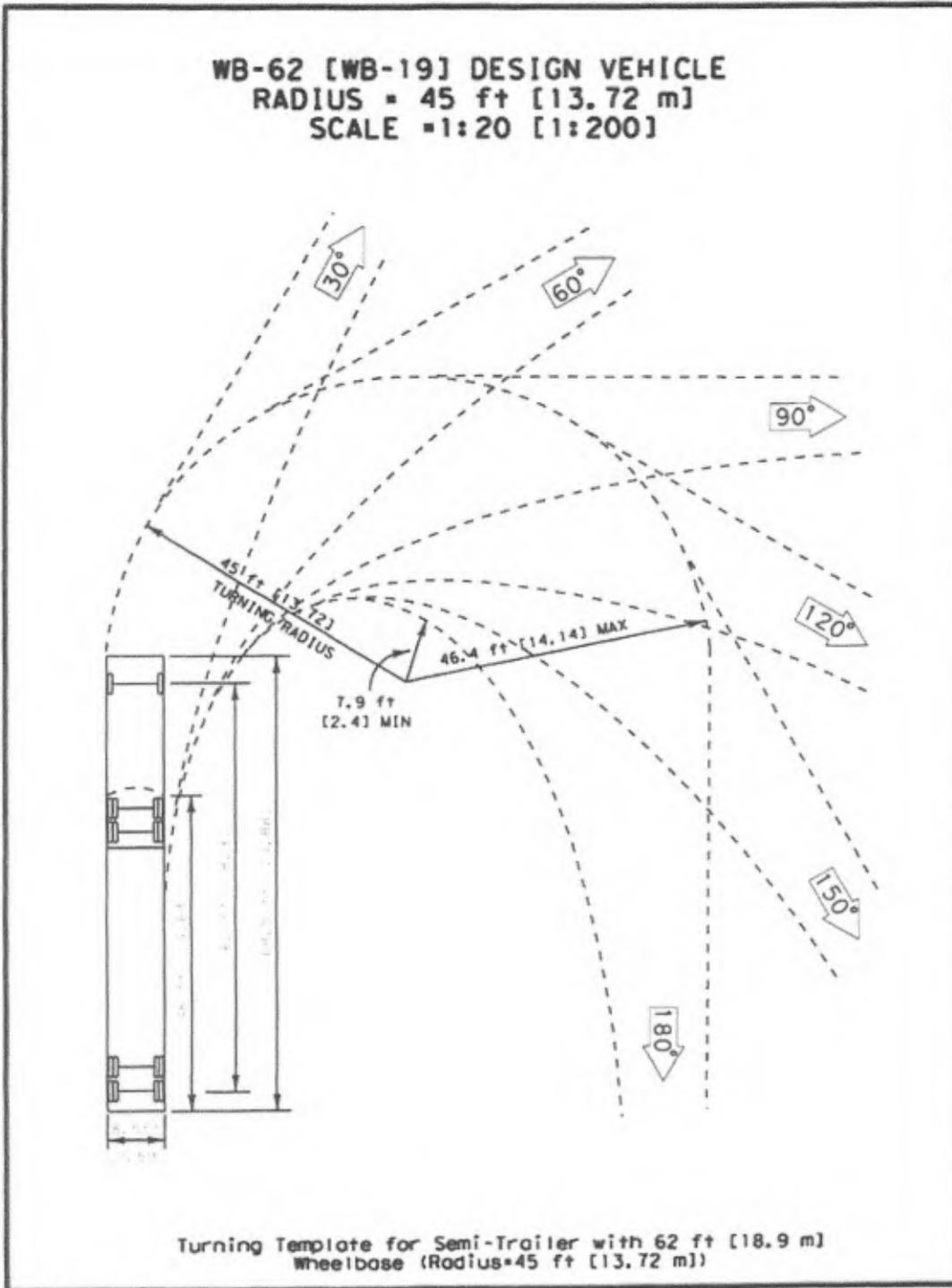


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

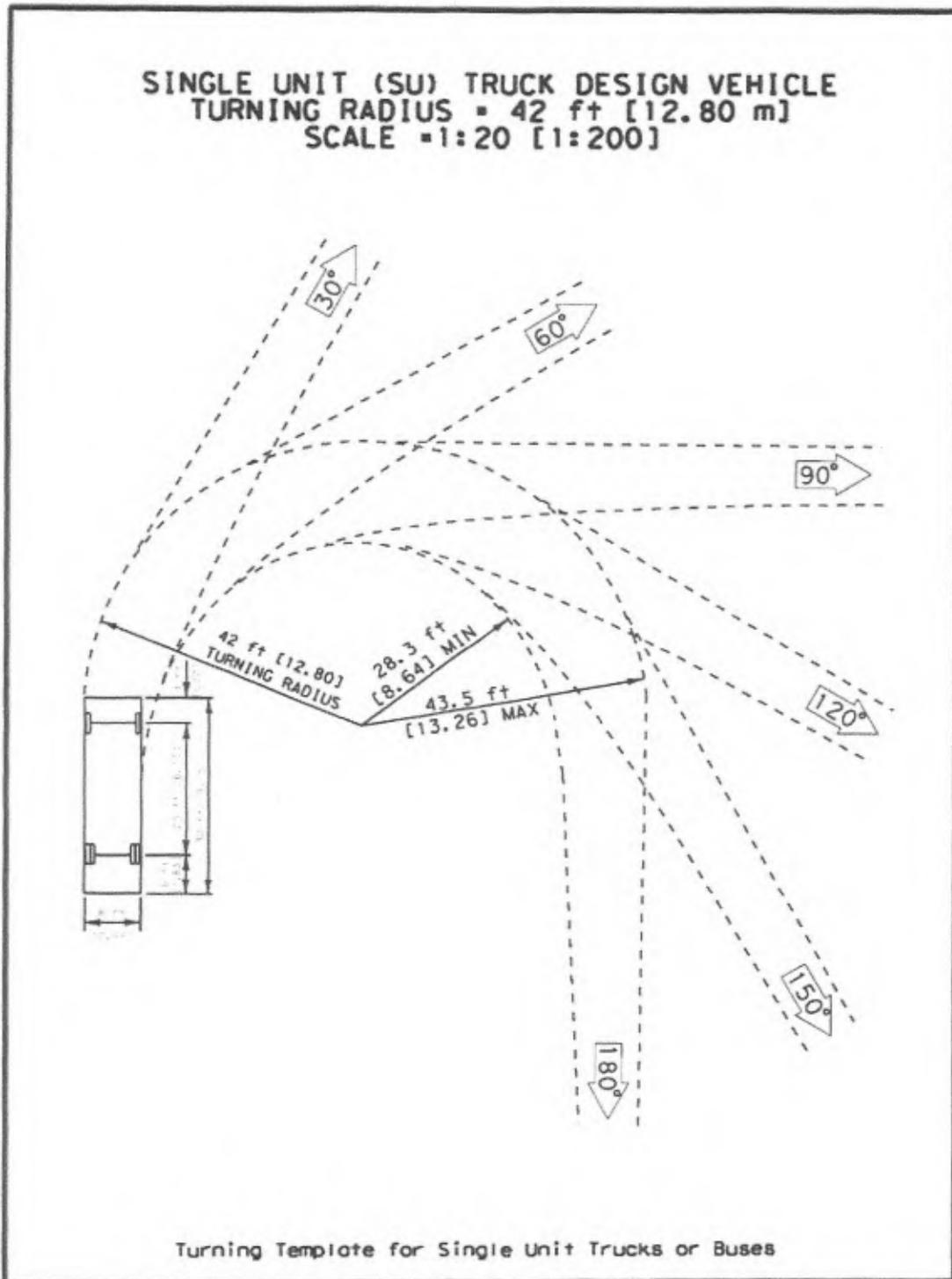


Exhibit 15

**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.

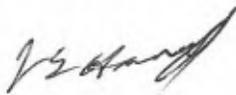
**Section 17. TRUCK ROUTES**

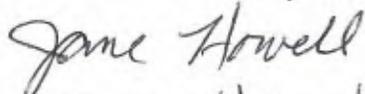
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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**

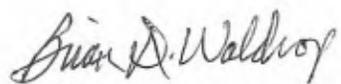
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

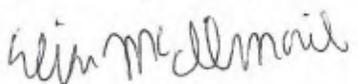
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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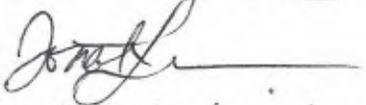
SIGNATURE   
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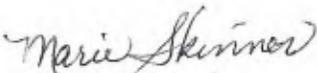
SIGNATURE   
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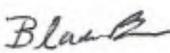
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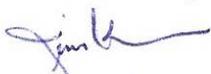
SIGNATURE   
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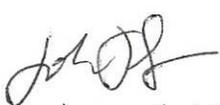
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PRINTED NAME Jim Kreider  
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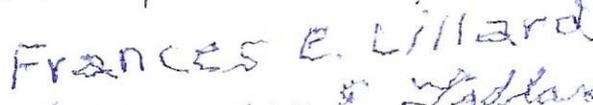
SIGNATURE   
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EMAIL jtol@charter.net

SIGNATURE   
PRINTED NAME Pasco Arritola  
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PRINTED NAME JOHN BARLITZ  
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EMAIL

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SIGNATURE   
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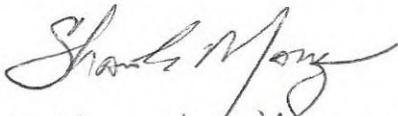
SIGNATURE   
PRINTED NAME Frances E. Lillard  
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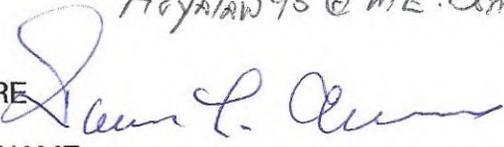
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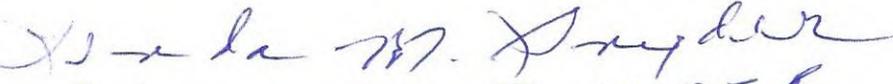
SIGNATURE   
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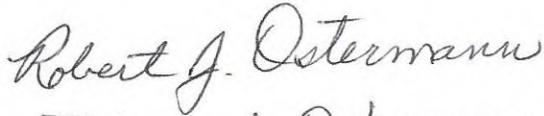
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SIGNATURE   
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EMAIL N/A

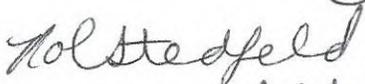
SIGNATURE   
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SIGNATURE   
PRINTED NAME Robert J. Ostermann  
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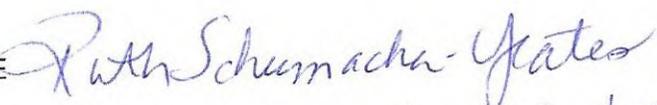
SIGNATURE   
PRINTED NAME Robin J. Ostermann  
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EMAIL

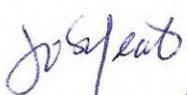
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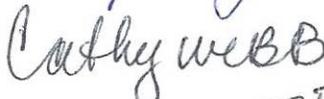
SIGNATURE   
PRINTED NAME Rita Allen  
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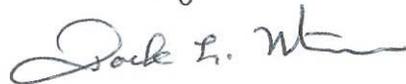
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SIGNATURE   
PRINTED NAME JOHN YEATES  
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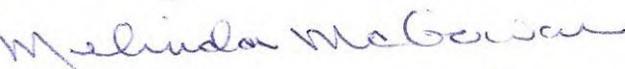
SIGNATURE   
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SIGNATURE   
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SIGNATURE *Gary D. Pierson*

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EMAIL -

SIGNATURE *Lynn Wheeler Duncan*

PRINTED NAME LYNN WHEELER DUNCAN

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SIGNATURE *Angela Sherer*

PRINTED NAME ANGELA Sherer

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EMAIL asherer@frontier.com

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SIGNATURE *Robert J. Sherer*  
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SIGNATURE *Heather M. Null*  
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SIGNATURE *Bert R. Freewing*  
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SIGNATURE *Lindsey McCullough*  
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SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

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SIGNATURE *Merle E. Comfort*  
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SIGNATURE *Robin L. Maille*  
PRINTED NAME Robin Maille  
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SIGNATURE *Bruce C Kevan*  
PRINTED NAME *Bruce C Kevan*  
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EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*  
PRINTED NAME CAROL S. SUMMERS  
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SIGNATURE *Caroline Kaye Juniper*  
PRINTED NAME Caroline Kaye Juniper  
ADDRESS 406 Nth St. LaGrande - OR 97850  
EMAIL

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SIGNATURE *Gerald D. Juniper*  
PRINTED NAME *Gerald Darwin Juniper*  
ADDRESS *406 4<sup>th</sup> St. LaGrande, PR. 97850*  
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](mailto: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:

X 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.

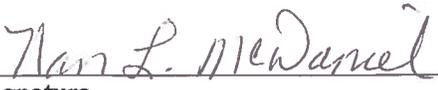
The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

#### 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

Nan L. McDaniel  
Printed Name:

Mailing Address: 63316 Gekeker Lane  
La Grande, OR 97750

#### 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.

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,

Nan L. McDaniel

Name: Nan McDaniel

Address: 63316 GeKeler lane  
LaGrande, OR

We have lived on 40 acres ~~since~~ since 1977. Water has always been an issue - one we give great concern and consideration. The trail from Morgan Lake over the hill has been of delight on many occasions. It is so special to have such beautiful hiking so close to Town - Nothing should be allowed to detract from such a treasure !!!

N. McDaniel

RECEIVED

AUG 22 2019

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

Dear Chair Beyeler and Members of the Council:

I believe you will allow this  
transmission line as proposed  
because right is right.

you are concerned by the  
applicant needs to increase  
their profit and not the  
needs of the community.

Richard L. McDaniel  
63316 Gehlen Lane  
LaGrande, OR 97850

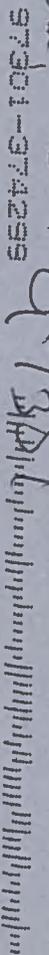
1112 1/2 Adams Ave  
La Grande, OR 97850

POSTMARKED ON SIZE  
17 AUG 2019 PM 4 E



Energy Facility Siting Counsel  
Attn: V. Tardeweth  
Oregon Dept. of Energy  
550 Capitol St., NE  
Salem OR 97301-374299

**RECEIVED**  
AUG 19 2019  
DEPARTMENT OF ENERGY



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

August 5, 2019

[B2H.DPOComments@Oregon.gov](mailto: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

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**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,

Kathleen McGee

Name: Kathleen McGee

Address: 80 Oak 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" <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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." <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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." <sup>5</sup>

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

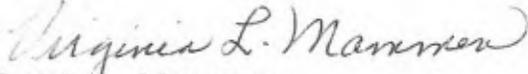
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

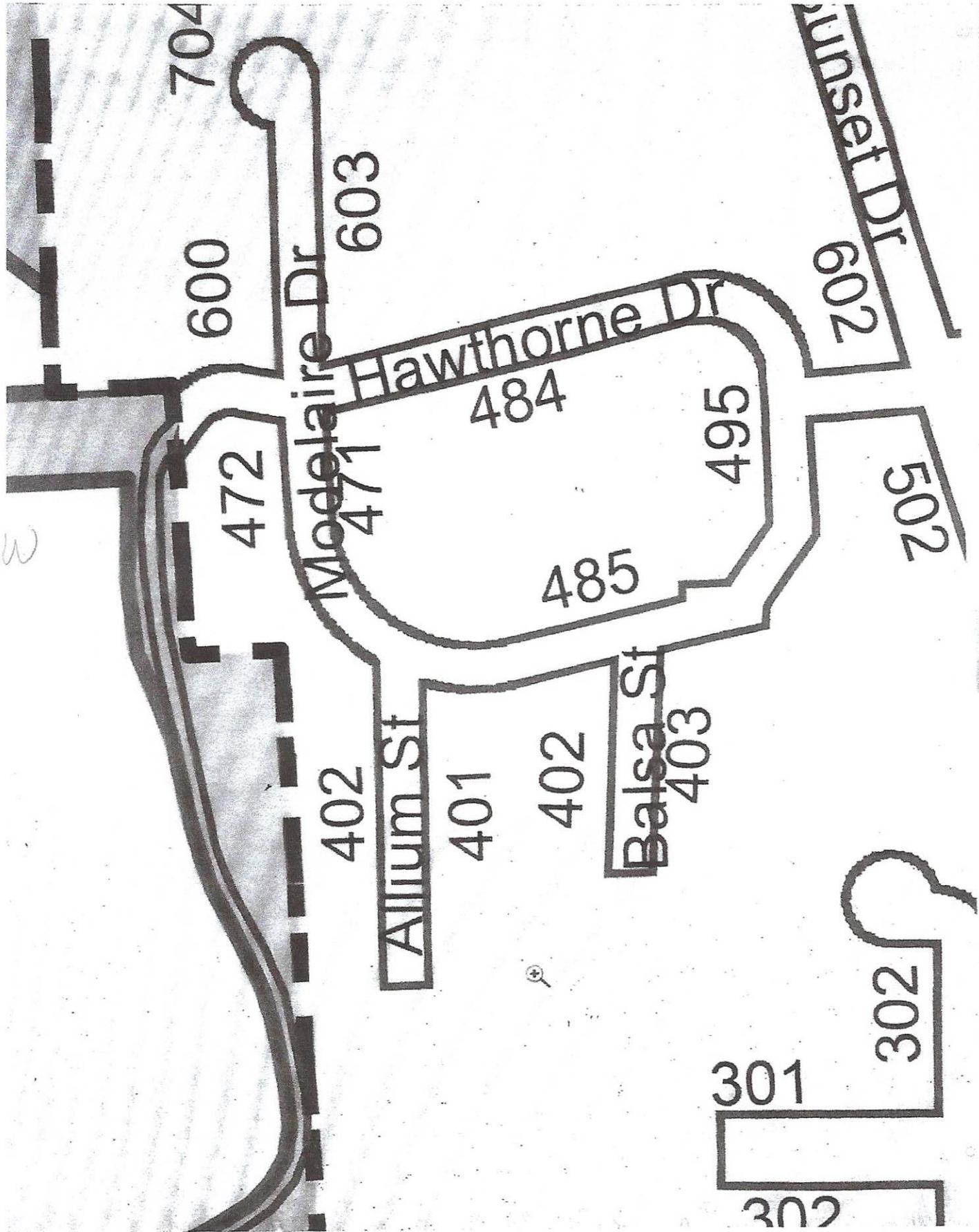
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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.

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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](http://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

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>proposed heliport is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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

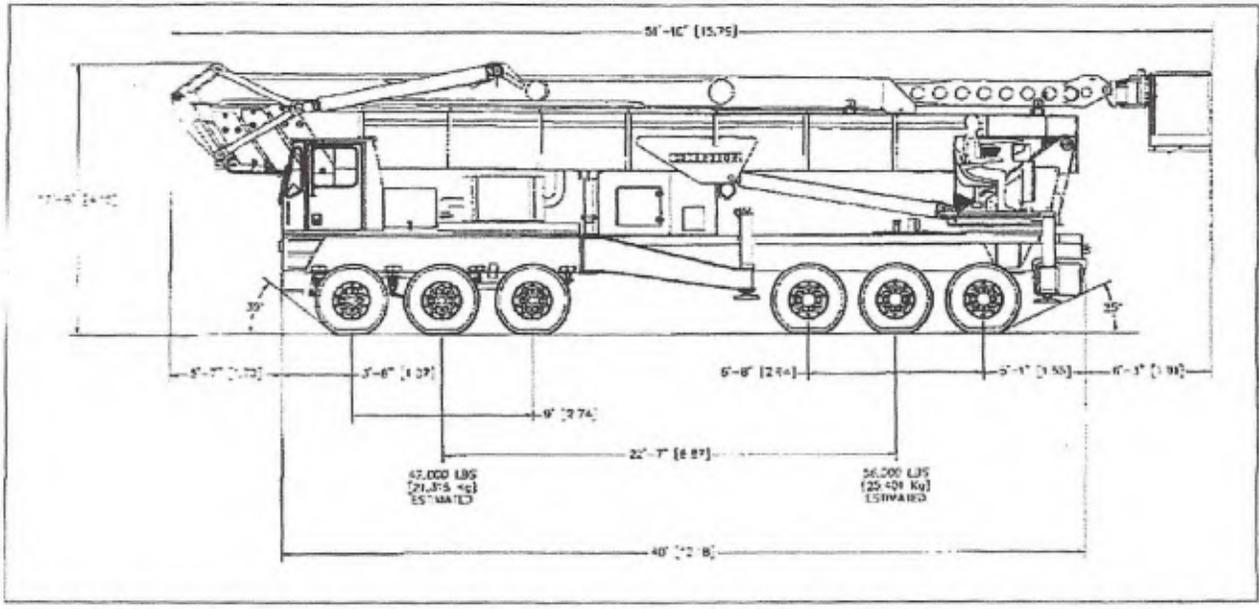


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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 tips 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
<b>Totals</b>	—	—	<b>620</b>	—	—	<b>188</b>

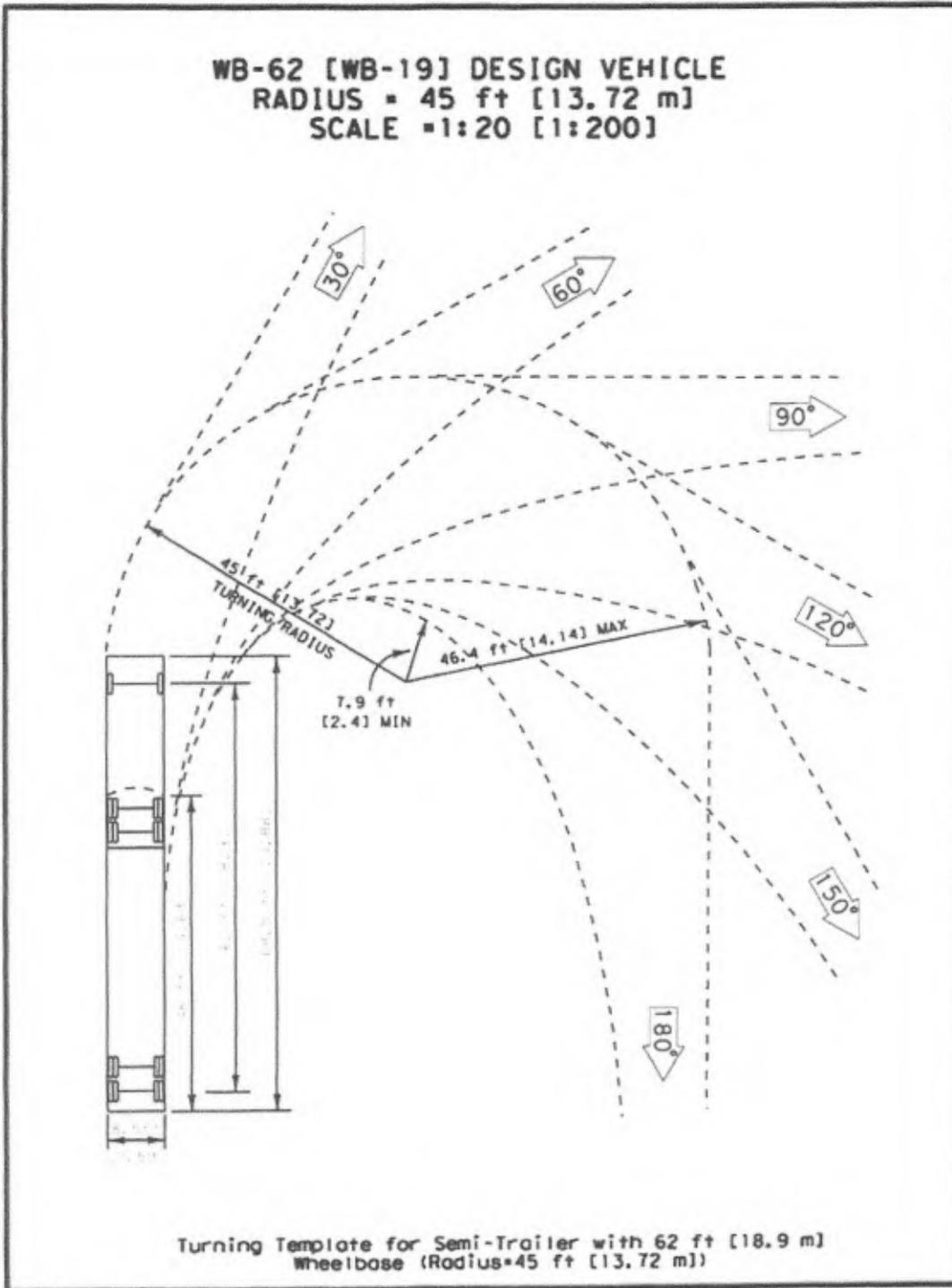


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

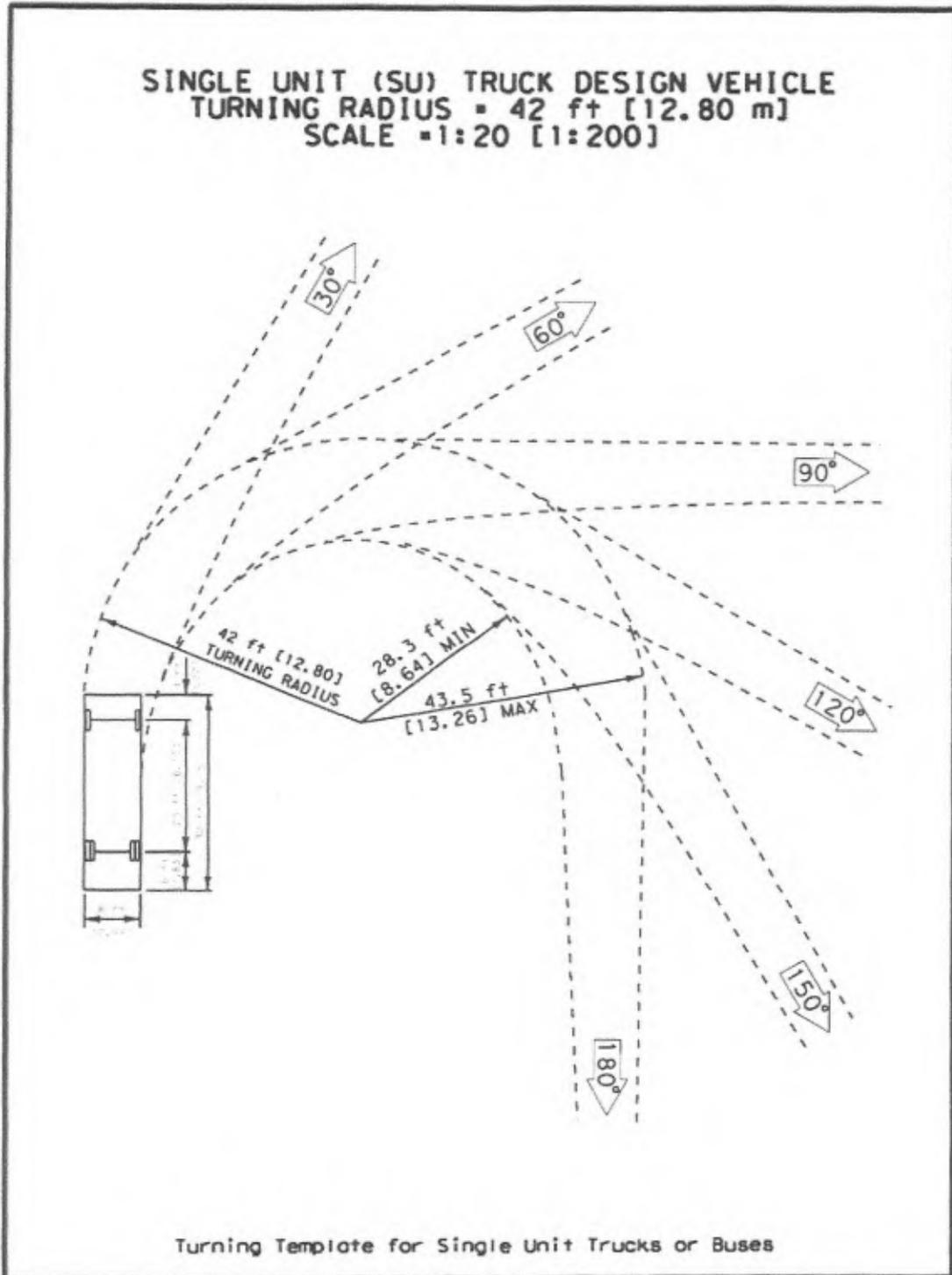


Exhibit 15

**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.

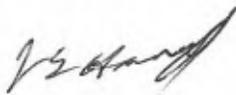
**Section 17. TRUCK ROUTES**

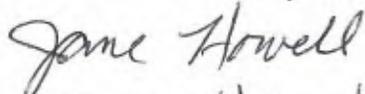
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

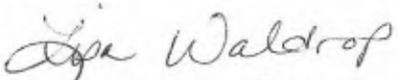
**Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES**

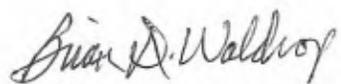
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

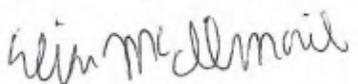
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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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PRINTED NAME Jane Howell  
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SIGNATURE   
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EMAIL mcilmail151@hotmail.com

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

  
Jessie Huxell  
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

  
C Huxell  
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CHRIS Huxell @ EMAIL.COM

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PRINTED NAME

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Jonah Lindeman  
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jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner  
Marie Skinner  
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marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

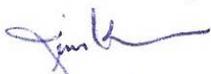
ADDRESS

EMAIL

Blake Bars  
Blake Bars  
1101 G Ave La Grande  
blakebars@gmail.com

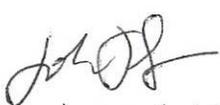
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SIGNATURE   
PRINTED NAME D. Dale Mammen  
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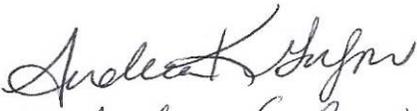
SIGNATURE   
PRINTED NAME Jim Kreider  
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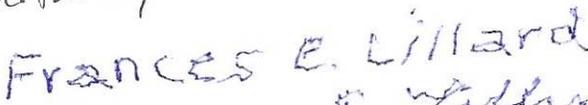
SIGNATURE   
PRINTED NAME Judie Arritola  
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ADDRESS 484 HAWTHORNE LG, OR 97850  
EMAIL

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SIGNATURE   
PRINTED NAME Andrea Gulzow  
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EMAIL foreverfamily33@aol.com

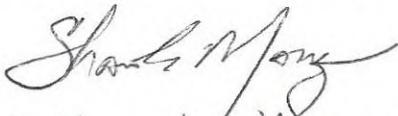
SIGNATURE   
PRINTED NAME Frances E. Lillard  
ADDRESS 471 Modelaire Dr. L.G.  
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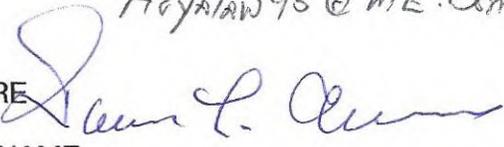
SIGNATURE   
PRINTED NAME Brent H. Smith  
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EMAIL smithbrent@gmail.com

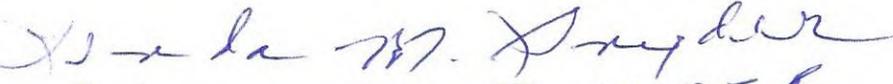
SIGNATURE   
PRINTED NAME M. Jeannette Smith  
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EMAIL jeannetterampton@gmail.com

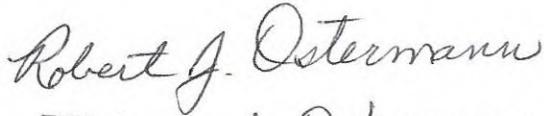
SIGNATURE   
PRINTED NAME KIMBERLEY HEITSTUMAN  
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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one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

SIGNATURE:   
PRINTED NAME Shawn K. Mangum  
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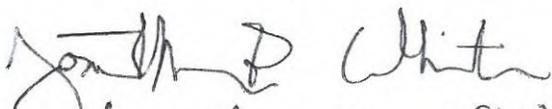
SIGNATURE   
PRINTED NAME  
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410 Balsa Street LaGrande, Oregon 97858  
EMAIL N/A

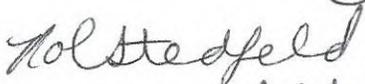
SIGNATURE   
PRINTED NAME Linda M. Snyder  
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SIGNATURE   
PRINTED NAME Robert J. Ostermann  
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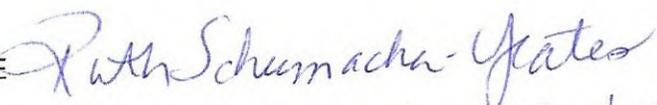
SIGNATURE   
PRINTED NAME Robin J. Ostermann  
ADDRESS 495 Modelaire Dr La Grande, OR 97850  
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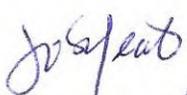
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SIGNATURE   
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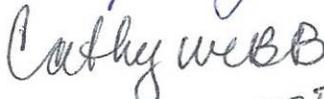
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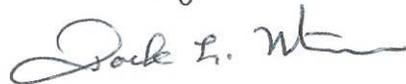
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PRINTED NAME Ruth Schumacher Yeates  
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SIGNATURE   
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EMAIL jyeates52@gmail.com

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PRINTED NAME CATHY WEBB  
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EMAIL thunkski@gmail.com

SIGNATURE   
PRINTED NAME Jack L. Martin  
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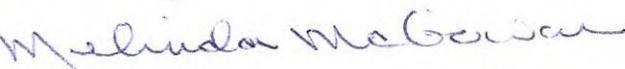
SIGNATURE   
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SIGNATURE   
PRINTED NAME Jean RAPH  
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PRINTED NAME Coy Sexton  
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SIGNATURE *Gary D. Pierson*  
PRINTED NAME Gary D. Pierson  
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EMAIL -

SIGNATURE *Lynn Wheeler Duncan*  
PRINTED NAME LYNN WHEELER DUNCAN  
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SIGNATURE *Anne G. Cavinato*  
PRINTED NAME Anne G. Cavinato  
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EMAIL acavinat@eou.edu

SIGNATURE *Joe Horst*  
PRINTED NAME JOE HORST  
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR.  
EMAIL joehorst@eoni.com

SIGNATURE *Angela Sherer*  
PRINTED NAME ANGELA Sherer  
ADDRESS 91 - 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 12<sup>th</sup> 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

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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  
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SIGNATURE *Bruce C Kevan*  
PRINTED NAME *Bruce C Kevan*  
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EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*  
PRINTED NAME CAROL S. SUMMERS  
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EMAIL carolsummers1935@gmail.com

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

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

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

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

## TARDAEWETHER Kellen \* ODOE

---

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that 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.<sup>10</sup>  
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. <sup>11</sup>

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

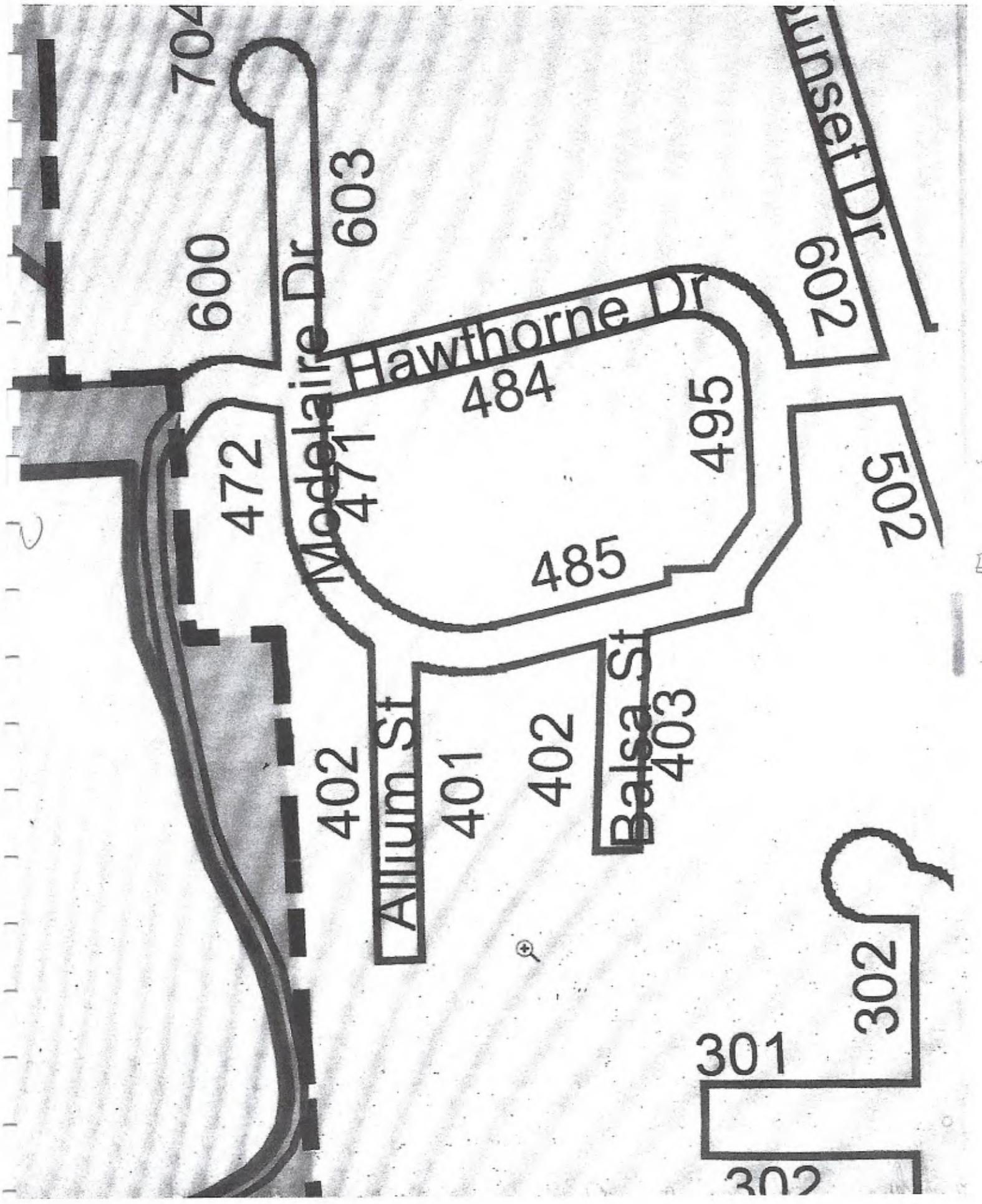
Sincerely,



Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

gmammen@eoni.com

N



5

### 3.3 Predicted Noise Levels

1 OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation  
2 of the proposed facility.  
3

#### 3.3.1 Construction Noise

##### 3.3.1.1 Predicted Construction Noise Levels

4 Project construction will occur sequentially, moving along the length of the Project route, or in  
5 other areas such as near access roads, structure sites, conductor pulling sites, and staging and  
6 maintenance areas. Overhead transmission line construction is typically completed in the  
7 following stages, but various construction activities may overlap, with multiple construction  
8 crews operating simultaneously:  
9

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

14 The following subsections discuss certain construction activities that will periodically generate  
15 audible noise, including blasting and rock breaking, implosive devices used during conductor  
16 stringing, helicopter operations, and vehicle traffic.  
17

##### **Blasting and Rock Breaking**

18 Blasting is a short-duration event as compared to rock removal methods, such as using track rig  
19 drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills.  
20 Modern blasting techniques include the electronically controlled ignition of multiple small-  
21 explosive charges in an area of rock that are delayed fractions of second, resulting in a total  
22 event duration that is generally less than a second. Impulse (instantaneous) noise from blasts  
23 could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.  
24

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

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

##### **Implosive Devices**

34 An implosive conductor splice consists of a split-second detonation with sound and flash.  
35 Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be  
36 developed by an individual certified and licensed to perform the work. The plan will  
37 communicate all safety and technical requirements including, but not limited to, delineation of  
38 the controlled access zone and distance away from residences.  
39

**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](http://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.



## Department of Environmental Quality

### Chapter 340

#### Division 35

#### NOISE CONTROL REGULATIONS

##### 340-035-0035

##### Noise Control Regulations for Industry and Commerce

###### (1) Standards and Regulations:

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

###### (b) New Noise Sources:

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

###### (B) New Sources Located on Previously Unused Site:

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

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

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

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

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

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

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

(3) Measurement:

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

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

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

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

(4) Monitoring and Reporting:

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

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

(A) Access to the site;

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

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

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

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

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

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

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

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

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

(g) Sounds that originate on construction sites.

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

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

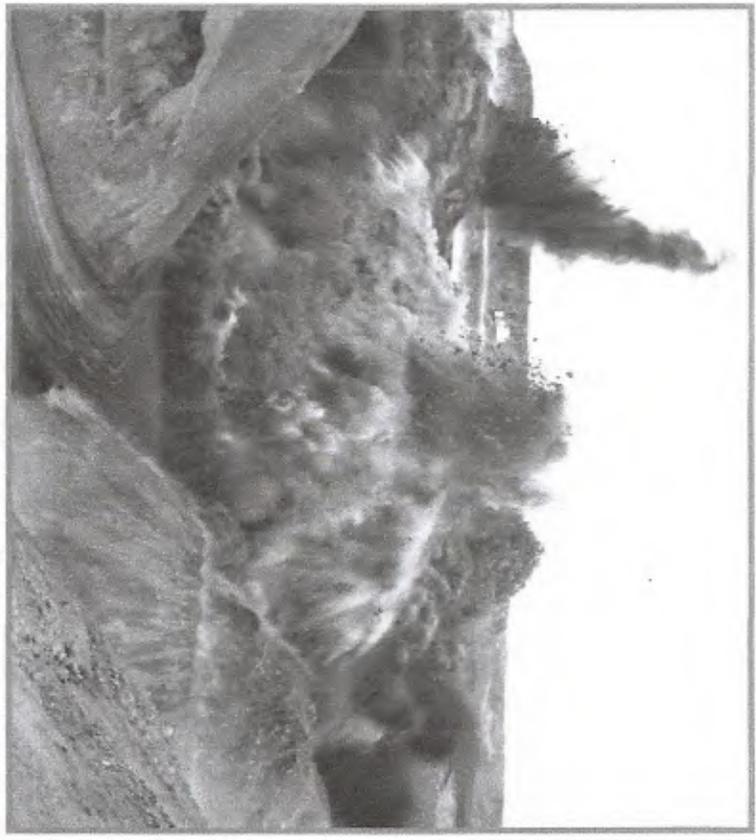
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal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

# Controlling the Adverse Effects of Blasting

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

- vibrations,
- airblast, and
- flyrock.

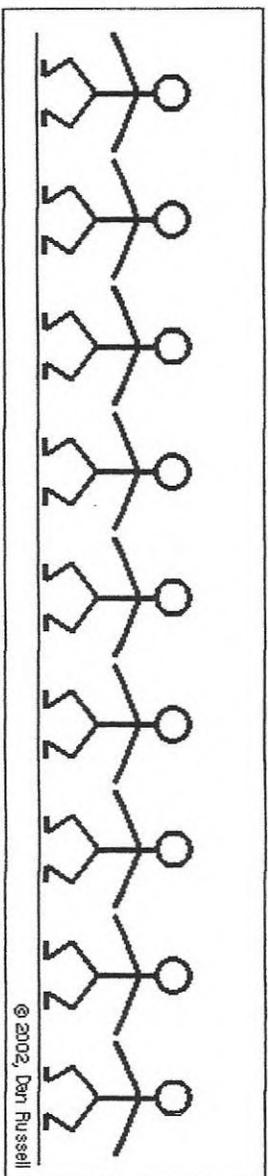
Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying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



## Part I: Ground Vibrations, Airblast, and Flyrock

Exhibit 5b

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



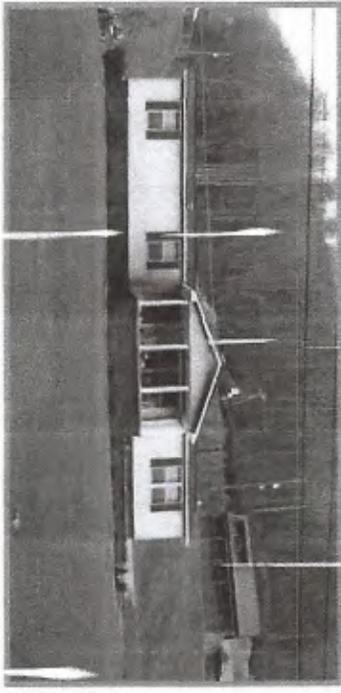
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

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

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

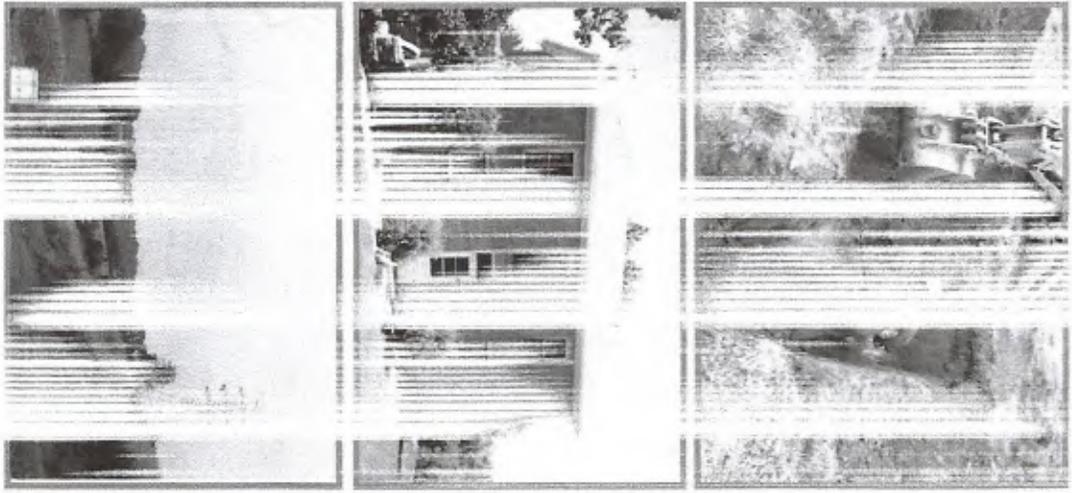
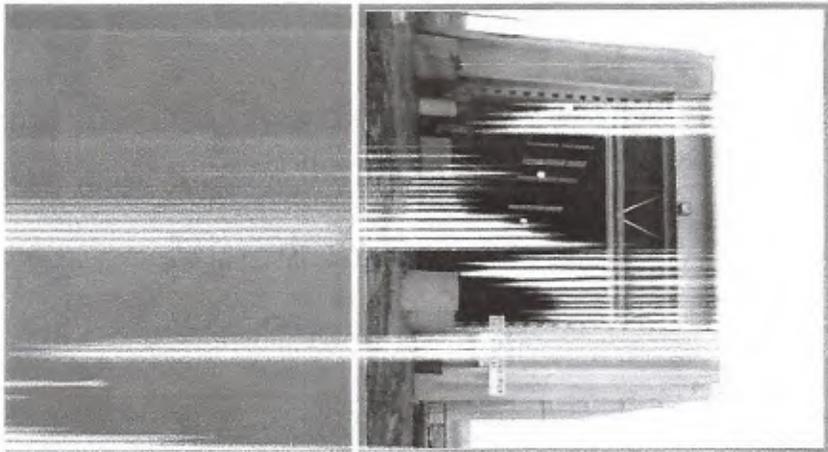
# Blasting Impacts on Structures

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



It is important to understand:

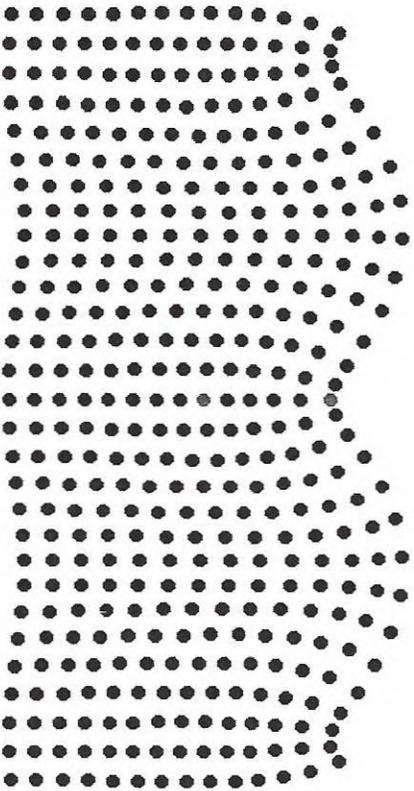
1. the causes of ground vibrations and airblast, and
2. what practices can be followed to control and minimize the adverse effects



## Ground Vibrations

---

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



©1999, Daniel A. Russell

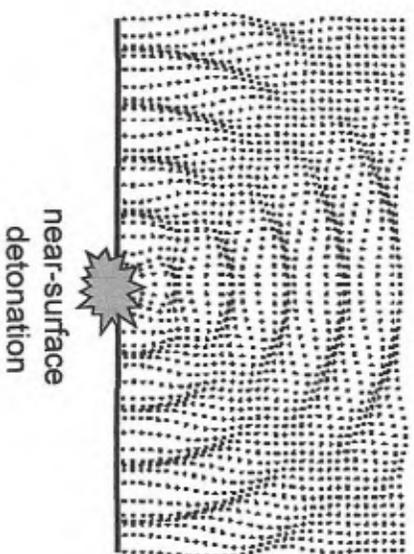
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

# Airblast

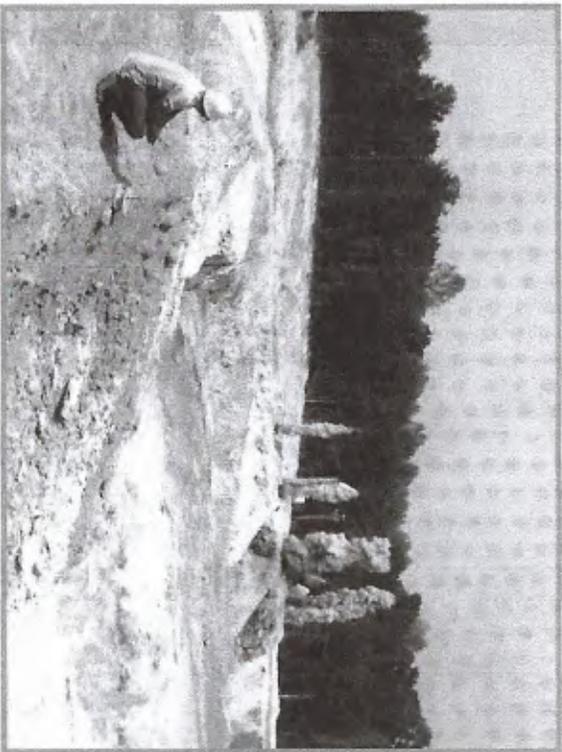
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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



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

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



# Structure Response

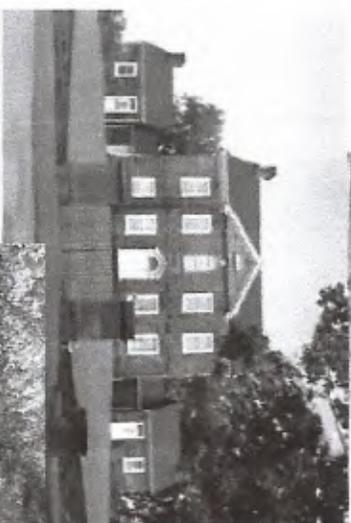
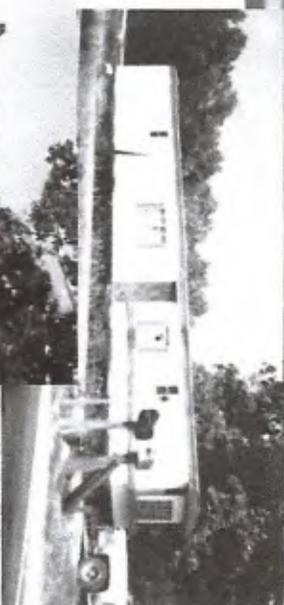
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

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

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

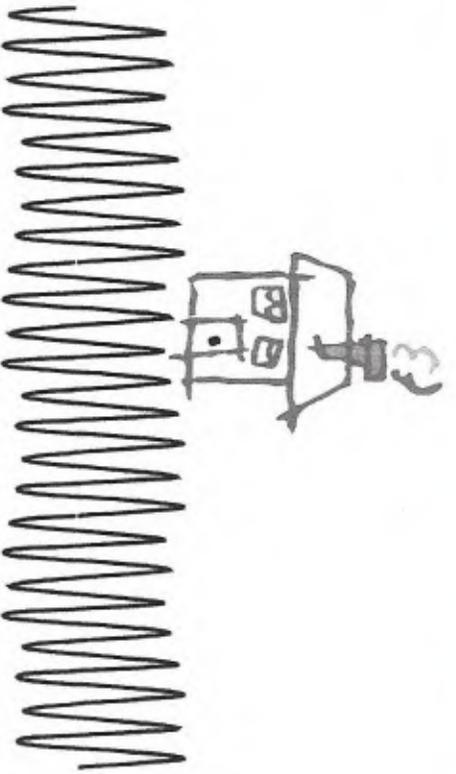
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

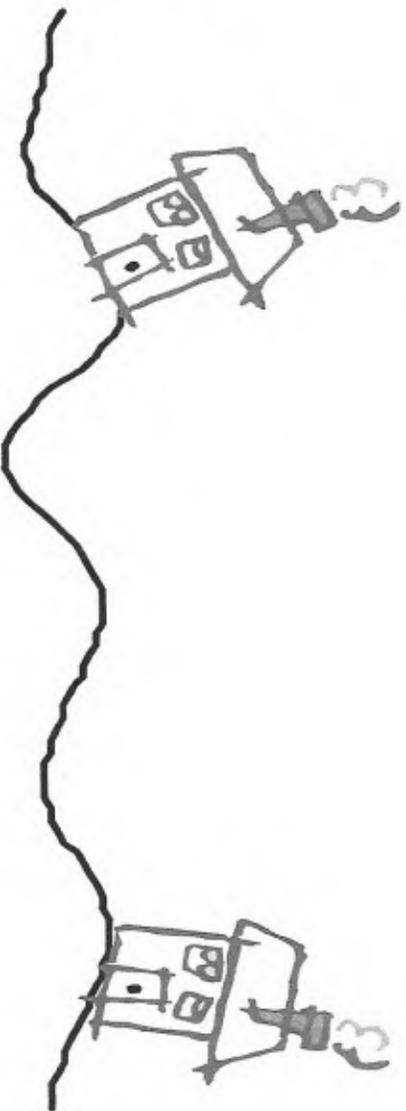


# Ground Vibration Structure Response

Exhibit 59



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.



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.



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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.

## References:

Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from [http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424\\_1\\_hospitals-neonatal-intensive-care-unit-noise](http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise)

Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>

Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

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## Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

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

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

### Symptoms

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

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

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



### Fear

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

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

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

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

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### Abstract

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

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

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

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

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

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

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

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

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

September 5, 2018

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



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

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

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

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

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

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

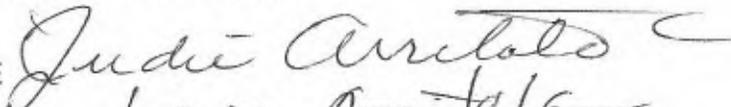
Where to begin?

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

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

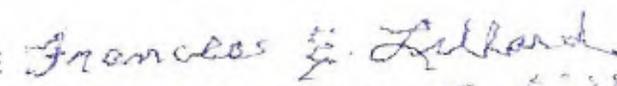


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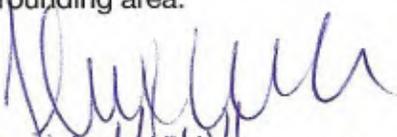
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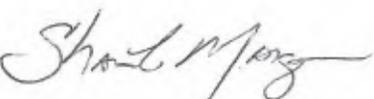
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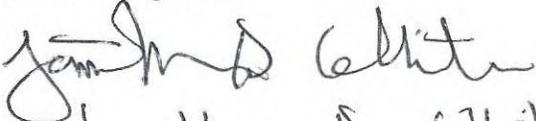
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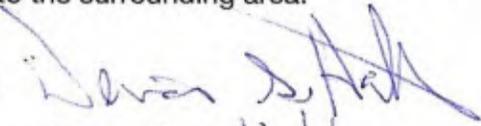
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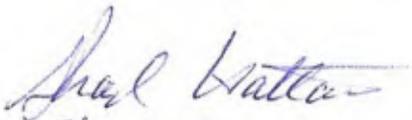


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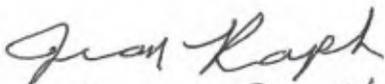
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to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

SIGNATURE

*Merle E Comfort*

PRINTED NAME

MERLE E COMFORT

ADDRESS

209 SWAPPO LA GRANDE OR 97850

EMAIL

merlecomfort@gmail.com

SIGNATURE

*Robin L. Maille*

PRINTED NAME

Robin Maille

ADDRESS

401 Cedar St., La Grande

EMAIL

rmaille@icloud.com

SIGNATURE

*Carol S. Summers*

PRINTED NAME

CAROL S. SUMMERS

ADDRESS

2811 Beketen Lane La Grande, OR.

EMAIL

carolsummers1938@gmail.com

SIGNATURE

*Caroline Kaye Juniper*

PRINTED NAME

Caroline Kaye Juniper

ADDRESS

406 4th Street - LaGrande - OR 97850

EMAIL

SIGNATURE

*Gerald D. Juniper*

PRINTED NAME

Gerald Darwin Juniper

ADDRESS

406 4th St. LaGrande, OR. 97850

EMAIL

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

SIGNATURE *Robert J. Sherer*  
PRINTED NAME Robert J. Sherer  
ADDRESS 970 Hawthorne Dr, La Grande, OR 97850  
EMAIL asherer@frontier.com.

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

SIGNATURE *Bert R. Freewing*  
PRINTED NAME Bert R. Freewing  
ADDRESS 709 South 12<sup>th</sup> Street La Grande, OR 97850  
EMAIL jeanfreewing@gmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

**ESTERSON Sarah \* ODOE**

---

**From:** Gray McGuire <gray.mcguire@gmail.com>  
**Sent:** Thursday, August 22, 2019 4:56 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:** EFSC comment.pdf

Dear Chair Beyeler and Members of the Council,

Please see my attached comment.

Thank you,

Donald Gray McGuire

60552 Bushnell Road  
La Grande, OR 97850

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

Dear Chair Beyeler and Members of the Council:

I am a longtime resident of La Grande and live within a birds-eye view of a portion of this proposed transmission line project. The process to approve this route is meaningless if the Energy Facilities Siting Council does not consider what is in the best interests of the citizens impacted by the development. Please consider my concerns. I appose the route due to degradation to recreation and tourism, increased risk of wildfires, failure to comply with noise standards and the lack of stability in geologically unstable areas.

## **RECREATION AND TOURISM IMPACTS**

### **National Historic Oregon Trail Interpretive Center**

The Draft Proposed Order fails to support Applicant's assertion that the Oregon Trail Interpretive Center, a protected area, will not suffer significant negative visual impacts from this project as delineated in OAR 345-022-0080. Visual Impacts, (Exhibit R p. 79) The development will create an energy corridor directly in front of the Interpretive Center, opening up the area to construction of future transmission lines and utility lines which could be developed without consideration of damages to this site.

The effects of placing this line as close as 105 feet to the Interpretive Center is significant. The structures proposed will present a wider profile than standard structures and will be significantly taller than existing transmission lines in the view-shed.

Applicant has exaggerated the cost of placing the line underground, failed to provide documentation to support its claims and proposed no meaningful mitigation. An independent study of costs to bury transmission lines in geographically similar areas is necessary to meet the standard of preponderance of evidence.

### **Ladd Marsh**

Impacts to Oregon's Ladd Marsh Wildlife Management Area would be severe and permanent. Ladd Marsh was established as a wildlife mitigation area for past federal projects and the refuge should not be compromised. IPC itself recognizes and designates Ladd Marsh as "irreplaceable."

Recreation - OAR 345-022-0100

Protected Areas - OAR 345-022-0040

Scenic Resources – OAR 345-022-0080.

### **Morgan Lake**

Morgan Lake Route 3 also establishes towers within 500 feet of Morgan Lake Park. Here, the impact on La Grande's public will be High. The first stated goal in the Morgan Lake Park Recreational Use and Development Plan (Section 1, Page 2) - A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users while at the same time providing safe and sanitary condition for users. Also noteworthy is the fact that the City of La Grande Chamber of Commerce has long promoted Morgan Lake Park as the #1 Recreation Tourist Destination in the La Grande Area. And the State of Oregon

designated Morgan Lake Park as a State Wildlife Refuge in the 1960s. Today Oregon Department of Fish and Wildlife identifies the Lake as an easy access fishing destination for the handicapped. Morgan Lake Park encompasses two separate Lakes. Morgan Lake is 70 acres in size and is developed with road access and camping. Twin Lake is 27 acres in size, undeveloped, and with no road access or camping. Twin Lake has been identified by both Federal and State programs to conserve, restore, and protect wetlands. Oregon has developed a Wetland Conservation Strategy (Oregon Division of Lands, 1993). This Strategy is implemented through the Oregon Wetlands Inventory and Wetlands Conservation Plans (See Web page). This planning process allows local governments to balance wetlands protection with other land-use needs. Twin Lake is recognized as an important, persistent, emergent vegetation wetlands, which includes both submersed and floating plants.

## **WILDFIRE RISK**

The increased potential for wildfire has been established as a given along any transmission line. Not only is there an undetermined and potentially significant amount of time that will elapse prior to the identification of the fire, but then there may be a response time of up to 40 minutes after a fire is located in some areas according to fire fighting resources. There will be ample opportunity for the fire to grow significantly. Given the potential lack of speed in getting to the location, the difficulty traversing the terrain, and the lack of specialized equipment available to fight forest fires, local resources are not adequate to protect the public from wildfires occurring due to the construction and ongoing operation and maintenance of this transmission line.

Responding to fires that do occur will limit local resources available to provide service to their local areas of responsibility and the developer is planning to rely upon those local resources to deal with fires along the transmission corridor. Concern over the increased risk of fire as a result of this transmission line including multiple comments voiced by the citizens of the counties as well as special advisory groups prompted both Union and Baker counties to request funding for an analysis and recommendation to identify and mitigate the increased risk created by the construction and operation of the transmission line. Funding for that activity is not being supported by the developer.

## **NOISE STANDARDS**

For the Boardman to Hemingway Transmission Line, Idaho Power failed to provide noise estimates for the lay down areas and other previously unused sites with impacts from items contained in OAR 340-035-0035(5)(b)-(f), (j), and (k). The developer incorrectly determined they were not required to do so.

The exception to requiring noise impacts from sources listed in subsections (5)(b)-(f), (j), and (k) does not apply to developments on sites not previously used. When a lay down area or other development is located on a site not previously used, OAR 340-035-0035(1)(b)(B)(ii) states, "Sources exempt from the requirements of this rule which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The applicant must provide noise monitoring results for all lay down areas or other areas where these types of noise will occur and the area was not previously used.

The applicant has not provided information necessary to determine compliance with the noise standard or if conditions can be included which would make them meet the noise standard.

## **GEOLOGIC 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 8 th 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](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.

Considering the points above, the project will not comply with state standards and will degrade the quality of life in Union County. Therefore **EFSC Must Deny the Site Certificate!**

Signature

A handwritten signature in black ink, appearing to read "Donald Gray McGuire". The signature is written in a cursive, flowing style.

Donald Gray McGuire  
60552 Bushnell Road  
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" <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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." <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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." <sup>5</sup>

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

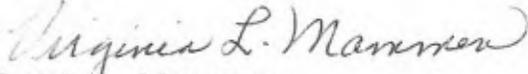
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

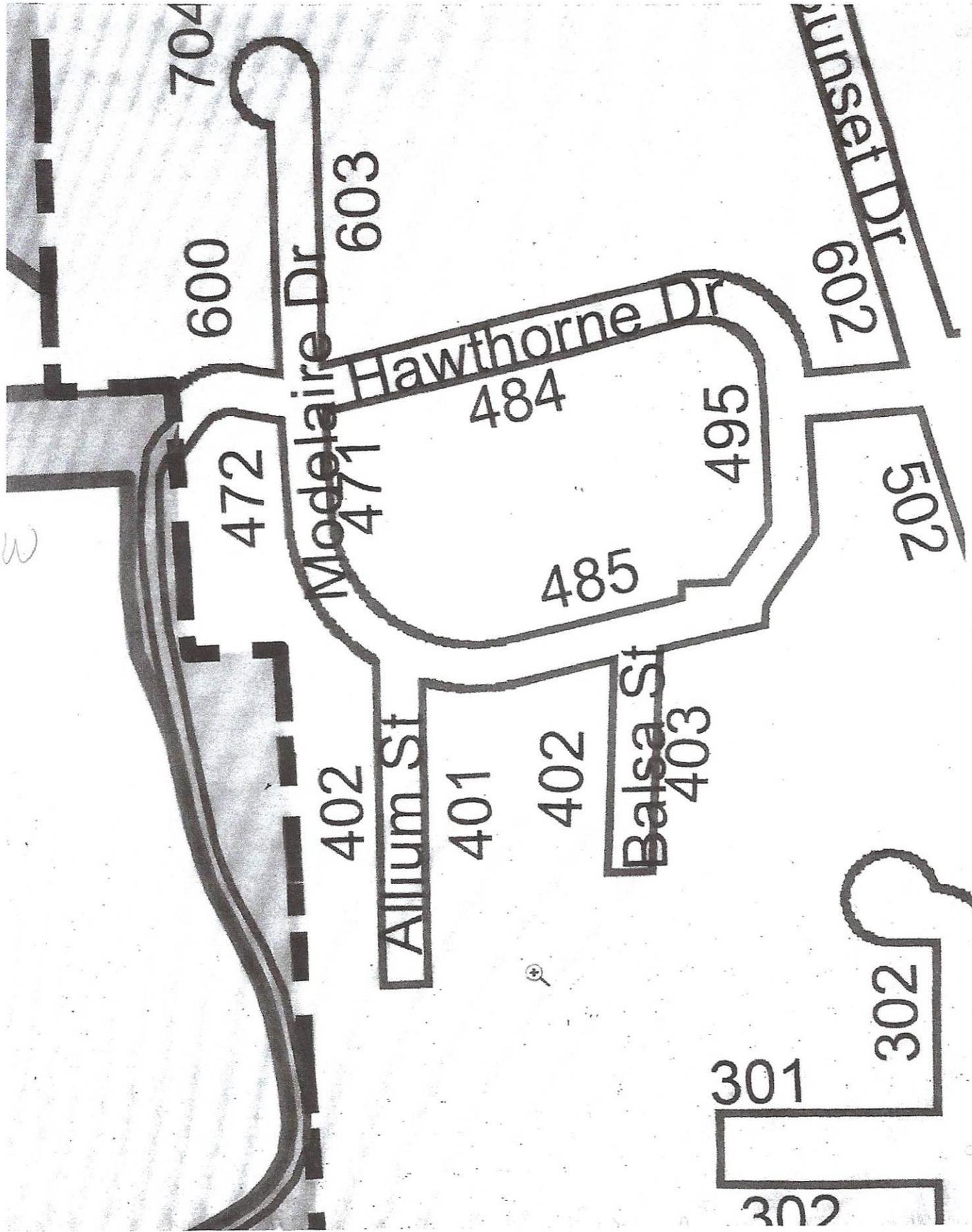
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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.

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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](http://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

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>proposed heliport is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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

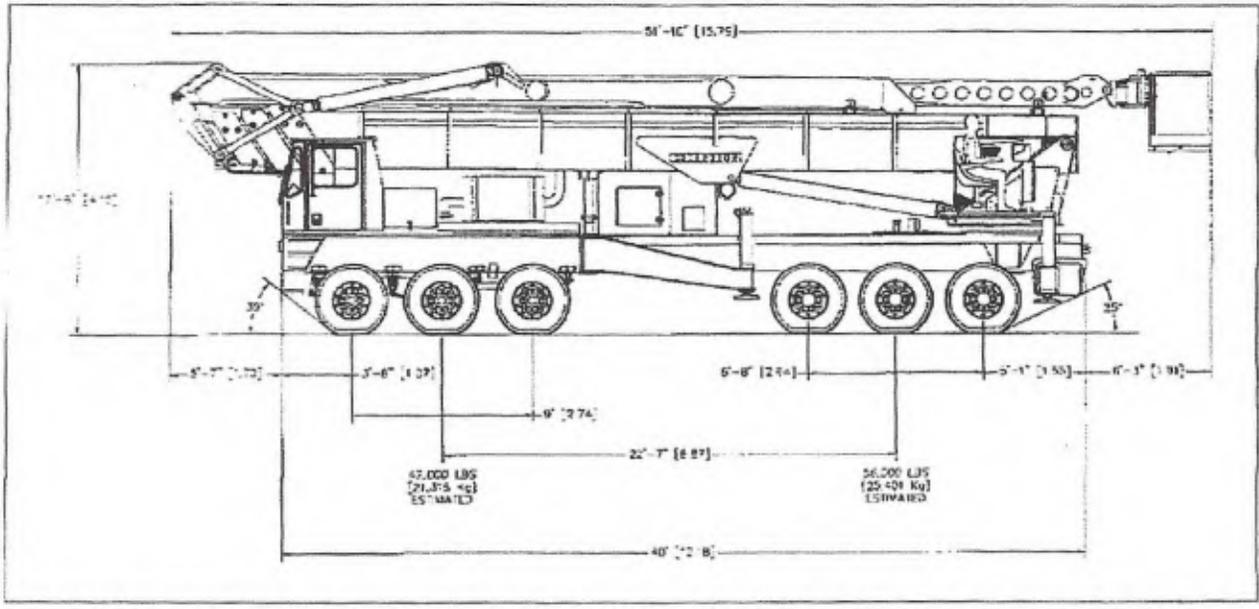


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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 tips 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
<b>Totals</b>	–	–	<b>620</b>	–	–	<b>188</b>

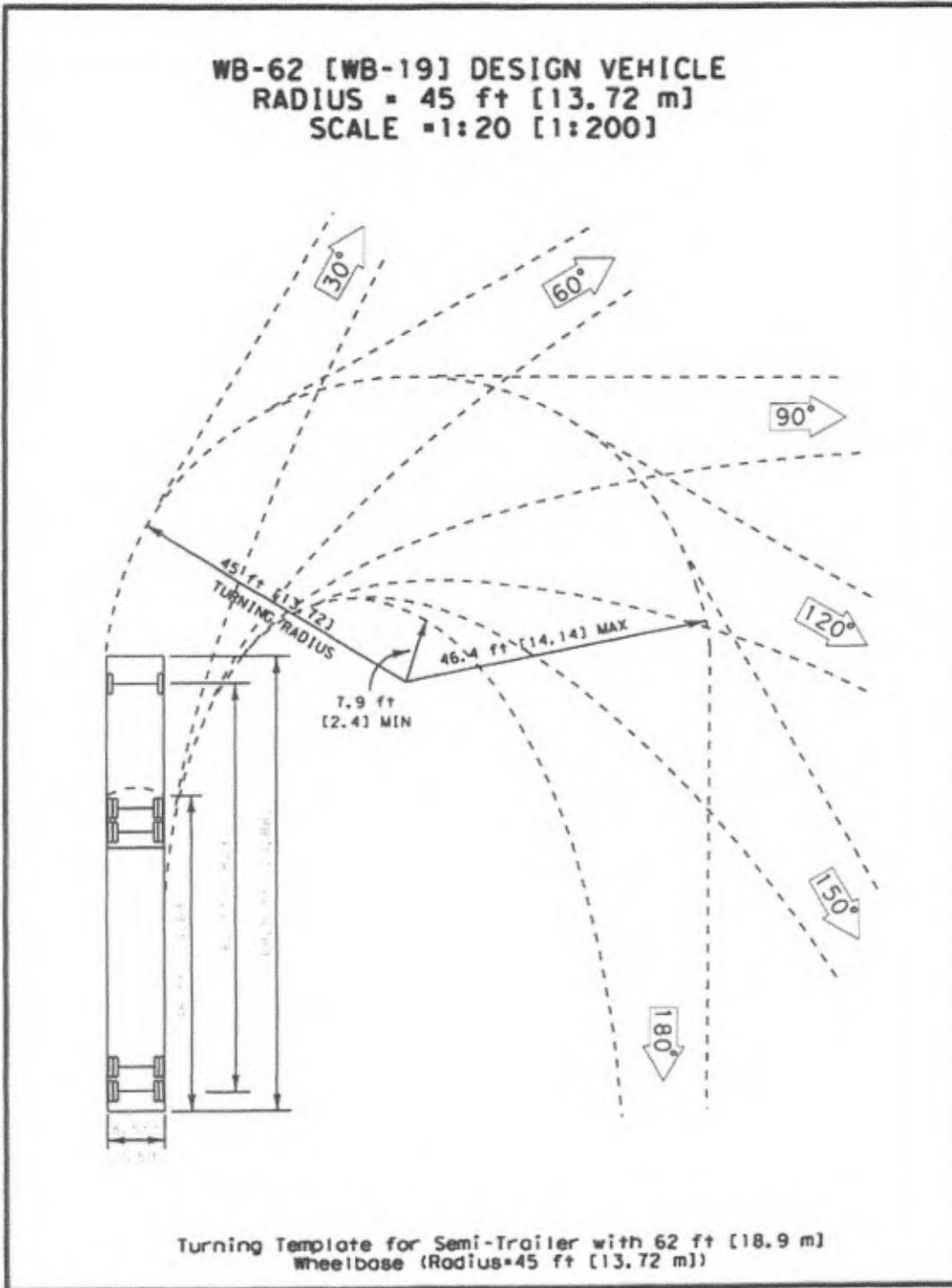


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

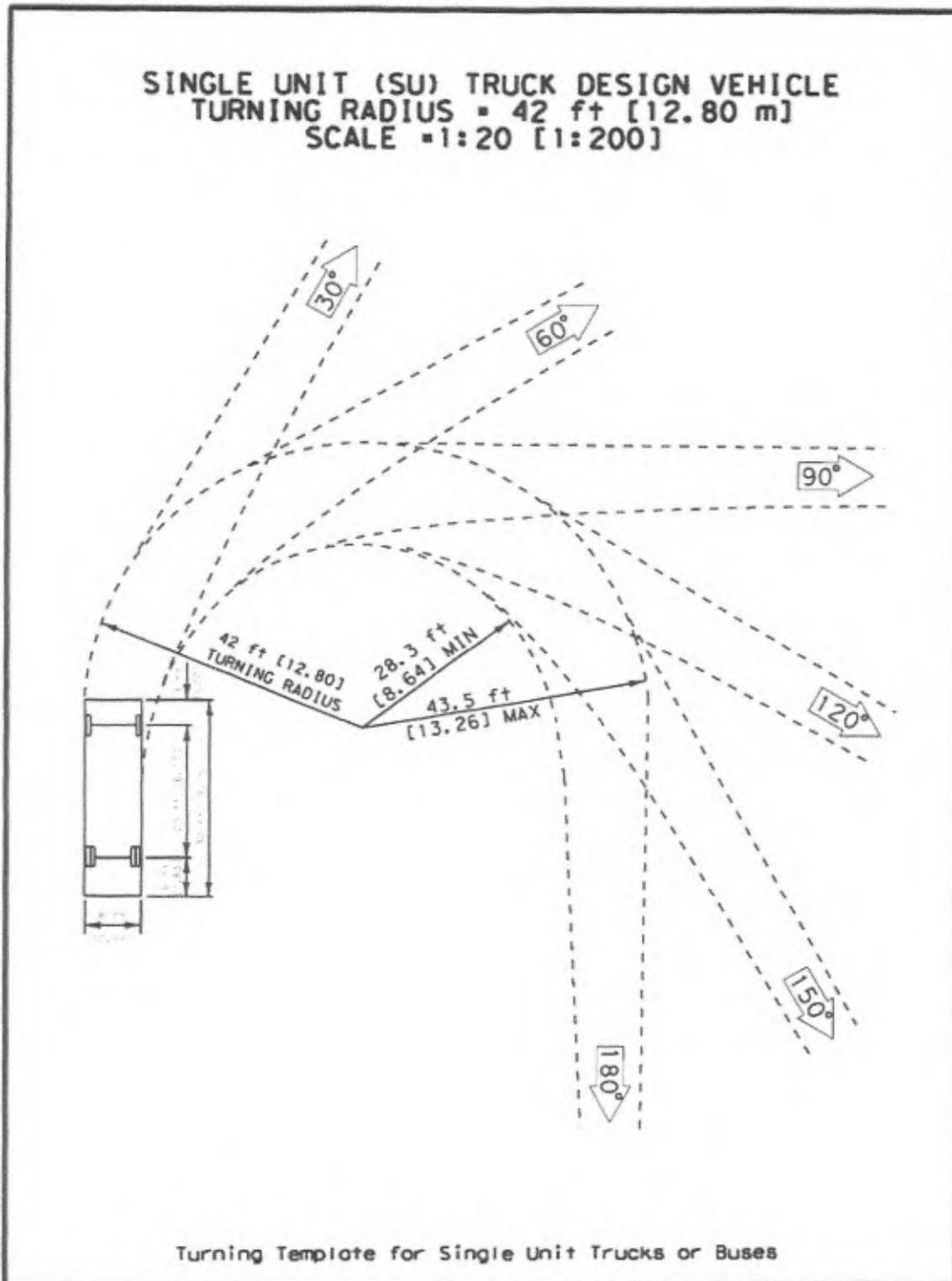


Exhibit 15

**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.

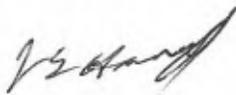
**Section 17. TRUCK ROUTES**

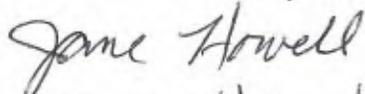
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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**

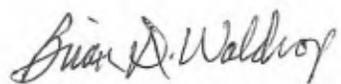
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

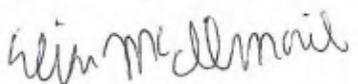
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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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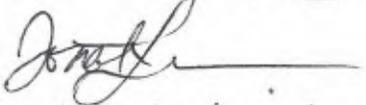
SIGNATURE   
PRINTED NAME BRIAN D. WALDROP  
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EMAIL bdwaldrop58@gmail.com

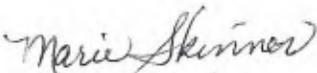
SIGNATURE   
PRINTED NAME ELISE McILMAIL  
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EMAIL mcilmail151@hotmail.com

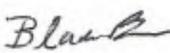
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SIGNATURE   
PRINTED NAME Jessie Huxell  
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SIGNATURE   
PRINTED NAME C. Huxell  
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EMAIL CHRISHUXELL@EMAIL.COM

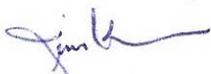
SIGNATURE   
PRINTED NAME Jonah Lindeman  
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SIGNATURE   
PRINTED NAME Marie Skinner  
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SIGNATURE   
PRINTED NAME Blake Bars  
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EMAIL blakebars@gmail.com

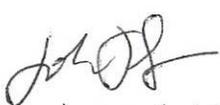
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SIGNATURE   
PRINTED NAME D. Dale Mammen  
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SIGNATURE   
PRINTED NAME Jim Kreider  
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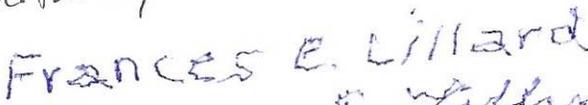
SIGNATURE   
PRINTED NAME Judie Arritola  
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SIGNATURE   
PRINTED NAME Pasco Arritola  
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EMAIL PSTOLA@CHARTER.NET

SIGNATURE   
PRINTED NAME JOHN BARLITZ  
ADDRESS 484 HAWTHORNE LG, OR 97850  
EMAIL

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SIGNATURE   
PRINTED NAME Andrea Gulzow  
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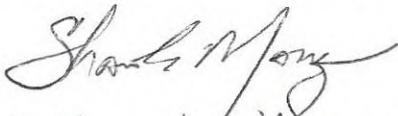
SIGNATURE   
PRINTED NAME Frances E. Lillard  
ADDRESS 471 Modelaire Dr. L.G.  
EMAIL

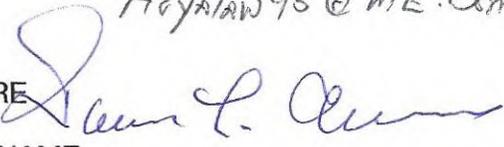
SIGNATURE   
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SIGNATURE   
PRINTED NAME M. Jeannette Smith  
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EMAIL jeannetterampton@gmail.com

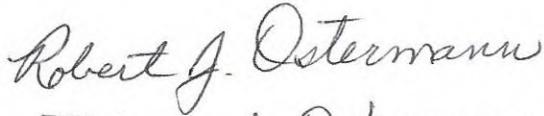
SIGNATURE   
PRINTED NAME KIMBERLEY HEITSTUMAN  
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850  
EMAIL kimheitstuman@hotmail.com

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SIGNATURE:   
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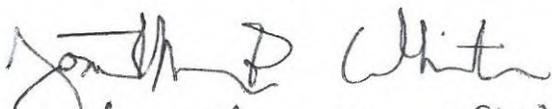
SIGNATURE   
PRINTED NAME  
ADDRESS Connie L. ALLEN 541-9637720  
410 Balsa Street LaGrande, Oregon 97858  
EMAIL N/A

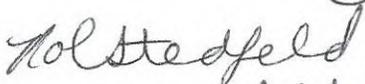
SIGNATURE   
PRINTED NAME Linda M. SNYDER  
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SIGNATURE   
PRINTED NAME Robert J. Ostermann  
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EMAIL

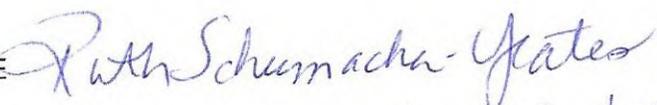
SIGNATURE   
PRINTED NAME Robin J. Ostermann  
ADDRESS 495 Modelaire Dr La Grande, OR 97850  
EMAIL

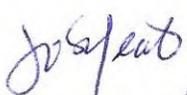
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SIGNATURE   
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PRINTED NAME Robin Stedfeld  
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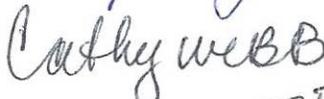
SIGNATURE   
PRINTED NAME Rita Allen  
ADDRESS 410 Balsa St. La Grande Or.  
EMAIL

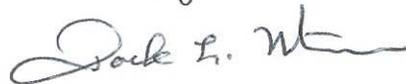
SIGNATURE   
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EMAIL ruthschumacheryeates@gmail.com

SIGNATURE   
PRINTED NAME JOHN YEATES  
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EMAIL jyeates52@gmail.com

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SIGNATURE   
PRINTED NAME CATHY WEBB  
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EMAIL thunkski@gmail.com

SIGNATURE   
PRINTED NAME Jack L. Martin  
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EMAIL Buff Martin 27 @GMail .com

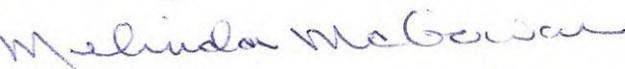
SIGNATURE   
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SIGNATURE   
PRINTED NAME Jean RAPH  
ADDRESS 1509 MADISON AVE LaGrande, OR 97850  
EMAIL Jraph19@gmail.com

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SIGNATURE   
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SIGNATURE   
PRINTED NAME Coy Sexton  
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SIGNATURE   
PRINTED NAME Melinda McGowan  
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EMAIL melindamegowan@gmail.com

SIGNATURE   
PRINTED NAME Keith D. Hudson  
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EMAIL Keithdhudson@gmail.com

SIGNATURE   
PRINTED NAME Laura Elly Hudson  
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EMAIL ellyhudson@gmail.com

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SIGNATURE *Gary D. Pierson*  
PRINTED NAME Gary D. Pierson  
ADDRESS 489 Modelaire Drive, La Grande OR 97850  
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*  
PRINTED NAME LYNN WHEELER DUNCAN  
ADDRESS 489 Modelaire Drive, La Grande OR 97850  
EMAIL rlwd1910@gmail.com

SIGNATURE *Anne G. Cavinato*  
PRINTED NAME Anne G. Cavinato  
ADDRESS 86 Hawthorne Dr. La Grande, OR 97850  
EMAIL acavinat@eou.edu

SIGNATURE *Joe Horst*  
PRINTED NAME JOE HORST  
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR.  
EMAIL joehorst@eoni.com

SIGNATURE *Angela Sherer*  
PRINTED NAME ANGELA Sherer  
ADDRESS 91 W. Hawthorne Dr. La Grande, OR 97850  
EMAIL asherer@frontier.com

I have read the attached letter regarding 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. Freewing*  
PRINTED NAME Bert R. Freewing  
ADDRESS 709 South 12<sup>th</sup> Street La Grande, OR 97850  
EMAIL jeanfreewing@gmail.com

SIGNATURE *Lindsey McCullough*  
PRINTED NAME Lindsey McCullough  
ADDRESS 406 Balsa St., La Grande, OR 97850  
EMAIL lindz\_mm91@hotmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

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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 carolsummers1935@gmail.com

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

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

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

**TARDAEWETHER Kellen \* ODOE**

---

**From:** Mc Iver, James Duncan <James.Mciver@oregonstate.edu>  
**Sent:** Saturday, August 17, 2019 8:52 PM  
**To:** B2H DPOComments \* ODOE  
**Cc:** Mc Iver, James Duncan  
**Subject:** Comment on the B2H Project  
**Attachments:** B2H\_Comment\_McIver\_17Aug2019.docx

**Chair Beyeler and Members of the Council** -- Attached please find my comments on the Draft Proposed Order called the 'B2H' project. Specifically, I am opposed to this development, primarily because the DPO dismally fails to provide evidence that the developers have done due diligence in understanding potential unintended consequences of the transmission lines. Please deny this certificate. Thank you, **JimMc**

James McIver  
Senior Research Associate Professor  
Oregon State University  
541-910-0924

16 August 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](mailto: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 5/19/2019

To Chair Beyeler and Members of the Council:

I am a practicing scientist who has worked on natural resource issues for the past 30 years, primarily with the Forest Service and Bureau of Land Management. I am writing this letter to voice my concern for the B2H transmission lines that would course through the countryside near La Grande, Oregon. In particular, I am a bit stunned that the Draft Proposed Order does not address the need for consultation with federal agencies commissioned with the protection of threatened and endangered species. At the very least, for a significant project like this, which has the capacity to cause a host of unintended consequences, consultations should be done, to bring the significant expertise of federal regulatory agencies into the mix.

For example, the Draft Proposed Order (p. 304, line 32, through p. 307, line 21), acknowledges that there will be impact on habitat of salmon and steelhead, but is unable to quantify it. Since *any* impact is prohibited for Cat-1 Habitats, the applicant has failed to meet the requirements for issuance of a Site Certificate.

There are numerous other potential impacts that B2H would have, all of them rising to a level that predicts a suite of negative unintended consequences should the transmission lines be allowed to be built. The Certificate should therefore be denied, for lack of due diligence in meeting federal and state requirements for adequate consultation.

Sincerely yours,

*James McIver*

James McIver  
Senior Research Associate Professor  
Oregon State University

COPY to [info@stopb2h.org](mailto:info@stopb2h.org)

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

August 5, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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

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

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

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

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

**ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:**

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

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

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

**ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:**

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

Sincerely,



Name: James McIVER

Address: 69565 ANTLES LANE  
COVE, OR 97824

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

August 21, 2019

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

Dear Chair Beyeler and Members of the Council:

I respectfully request that this letter protesting issuance of a Site Certificate for the proposed Boardman to Hemingway Transmission Project be entered on the record.

I know that you have received many letters outlining myriad carefully researched and well-supported reasons for denying the issuance of this certificate. My reasons are more general. This world needs to pursue alternative forms of power generation. Being able to take it from a source in Oregon and transport it elsewhere (at great cost ecologically, aesthetically, and in many other ways) is a luxury that is no longer acceptable. 'Necessity is the mother of invention.' Idaho Power 'needs' to find an alternative – and not in Oregon. Wind, solar, geothermal, other? Conservation? They need (and will) respond to necessity created by a refusal to permit this poorly thought out choice.

Sincerely,



Jean McKern

64672 Orchard Rd.

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 addressed in a separate comment.

Sheryl L. McNeil

Signature

Name: Sheryl L. McNeil

Address: 201 Terrace Ave  
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:

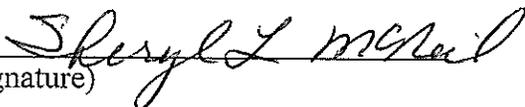
As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with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

Address  
201 Terrace Ave  
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](mailto: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 8<sup>th</sup> 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](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.

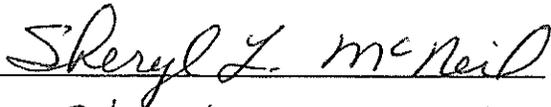
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

Address: *201 Terrace Ave*  
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

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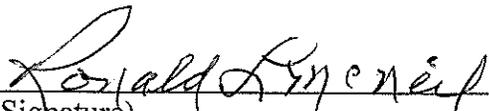
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(Signature)

Name: RONALD L. MCNEIL

Address 201 TERRACE AVE.  
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

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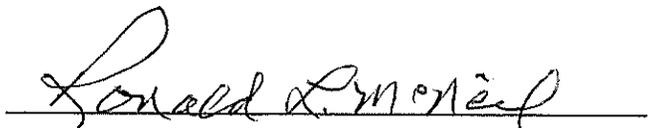
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The Council should DENY the request for a site certificate.

Sincerely,

A handwritten signature in cursive script that reads "Ronald L. McNeil". The signature is written in black ink and is positioned above a horizontal line.

Name: RONALD L. MCNEIL

Address: 201 TERRACE AVE.  
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

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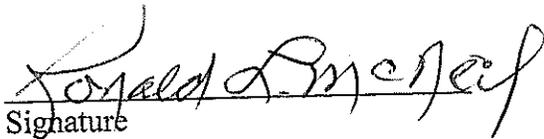
Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe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

*The applicant also used aerial photography to identify and avoid, where practical, irrigation pivots, houses, barns, private runways, other structures (e.g., wind turbines), and land use features. The corridors were adjusted using topographic maps to avoid or minimize distance across very steep slopes and other physical features less desirable for transmission line construction and operation. The corridors were again checked against the constraint and opportunity geographic information system (GIS) database to avoid, where possible, exclusion areas and areas of high permitting difficulty such as potential Oregon Department of Wildlife (ODFW) Category 1 habitats. The applicant then grouped the alternative corridors into 14 regions and evaluated on the basis of permitting difficulty, construction difficulty and mitigation costs. Using the constraint database, which incorporated the eight siting factors, the applicant reviewed the alternatives to determine the most reasonable corridor within each region. (DPO p. 11)*

It is distressing to think that this is only one of many errors in Idaho Power’s ASC. If the IPC surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it’s disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety

If this slipshod effort is typical of IPC's careful attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake route rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by a individuals whose remote properties and summer cabins would have been impact by the line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the routes proposed for the B2H. The haste of this effort is evident in the abundant errors of omission and misinformation typical of the B2H ASCand DPO which will be addressed in a separate comment.

  
Signature

Name: RONALD L. MCNEIL

Address: 201 TERRACE AVE.  
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) Margaret L Mead

Mailing Address (mandatory) 57744 Foothill Road  
La Grande OR 97850

Phone Number (optional) 541 910-6457 Email Address (optional) or statement

Today's Date: 6/26/19

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

Written comments can also be submitted today.

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

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

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Page 38

1 going to be experiencing a bunch of noise. That is like  
 2 inhumane to approve something like that.  
 3 And if the developer thinks that putting  
 4 noise-blocking blinds up is a way to mitigate for having  
 5 exceedances of the noise standard. So all these people  
 6 in all these counties that have beautiful views can  
 7 choose between going nuts with tinnitus and noise  
 8 impacts or not being able to see out the front window.  
 9 So those are not real good options in my mind.  
 10 I could go on for hours. And my last comment  
 11 I guess would be, I have done a lot of, spent a lot of  
 12 time reviewing rules and identifying various areas that  
 13 are problematic. I'm having a really hard time getting  
 14 through this application and the draft proposed order  
 15 and analyzing what it all means. And so I really  
 16 believe that you have a lot of people out here who are  
 17 laypeople, and I'm hearing from a lot of them saying,  
 18 I'm completely lost, I can't understand all this.  
 19 I think that July 23rd is really not realistic  
 20 for people -- I'll get through it by July 23rd because  
 21 I'm willing to working until 2:00 or 3:00 in the  
 22 morning, if that's what it takes to get through all of  
 23 these rules. But there are a whole lot of people out  
 24 there that have jobs -- I'm retired -- and they are  
 25 struggling.

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1 So it seems to me that 60 days is not a lot of  
 2 time for them, especially when the Department of Energy  
 3 has been working on this for years. So that's my final  
 4 comment.  
 5 Any questions?  
 6 HEARING OFFICER WEBSTER: What do you believe  
 7 would be a reasonable time if Council were to consider a  
 8 request to extend it?  
 9 MS. IRENE GILBERT: I think they should have  
 10 had 90 days anyway. It's not good for me because I plan  
 11 on going somewhere this summer, and I probably still  
 12 will. But from what I'm hearing from people, they are  
 13 just now starting to figure out, at least a starting  
 14 point, but they are overwhelmed.  
 15 HEARING OFFICER WEBSTER: So total of 90 days  
 16 or --  
 17 MS. IRENE GILBERT: A total of 90 days.  
 18 Another 30 days I think would be reasonable to give  
 19 people. Like I say, they are just starting to figure it  
 20 out.  
 21 HEARING OFFICER WEBSTER: Okay. I think, as I  
 22 indicated at the outset, we will approach, that Council  
 23 will approach that request I think at the end of the  
 24 public comment tonight.  
 25 MS. IRENE GILBERT: Thank you.

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1 And thank you for showing up. Thank you for  
 2 listening to me over and over. I hope I covered some  
 3 different things this time.  
 4 HEARING OFFICER WEBSTER: Thank you,  
 5 Ms. Gilbert.  
 6 We have Margaret Mead next.  
 7 MS. MARGARET MEAD: My name is Margaret L.  
 8 Mead. I live at 57744 Foothill Road, La Grande.  
 9 This doesn't meet a lot of your  
 10 specifications, but I feel like it's something that  
 11 needs to be said. And on behalf of a friend who  
 12 testified last week, he just had said, Would you please  
 13 say to the Council, listen to people talking. He had  
 14 the impression last week that people were more involved  
 15 with their computers or their laptops or whatever. And  
 16 I said, I really thought that people were taking notes.  
 17 So I'm just delivering that message. And I guess if I'm  
 18 the last speaker, it's irrelevant basically.  
 19 A myriad of reasons Idaho Power's preferred  
 20 route should not be approved have been presented in  
 21 previous testimony. My remarks primarily concern Idaho  
 22 Power's reason for choosing this particular route. It  
 23 is the least costly for them. Their cost estimation,  
 24 however, completely ignores the truly important costs,  
 25 that to the people who live along this proposed line.

Page 41

1 And yes, we, the people, matter. We live and  
 2 work here, we pay taxes, we are engaged in volunteer  
 3 activities that make our community better. We own  
 4 businesses, farms, ranches, and homes. We might have  
 5 been born here or we chose to live here, often because  
 6 of the natural beauty that surrounds us. We have a  
 7 quality of life that is not found in urban areas.  
 8 Should this line be built as proposed, that  
 9 quality of life will be greatly diminished. 74 percent  
 10 of the land along the preferred route is owned by  
 11 private persons, with only 26 percent being public.  
 12 What right does a corporation have to usurp  
 13 our private lands, this land individuals have cared for  
 14 and that provides a livelihood and/or a place of refuge,  
 15 our homes?  
 16 I understand eminent domain as a privilege  
 17 only for the government, which, theoretically, is for  
 18 the public's good. Corporations should not have the  
 19 capability to take from private persons. The cost to us  
 20 is great and immeasurable.  
 21 My Minnesota story, which I share because it  
 22 is similar to what millions of other people throughout  
 23 the United States have experienced. And I really hope  
 24 that the people who live along the proposed route won't  
 25 have to.

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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.  
 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.  
 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.  
 24 From the time my parents knew their land was  
 25 going to be taken, until many years later, my mother was

Page 43

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.  
 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.  
 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.  
 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.  
 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

Page 44

1 compensating for these costs, many of which cannot be  
 2 paid for with money.  
 3 Most landowners would also not have the  
 4 resources to sue for damages; farming and ranching,  
 5 usually not being lucrative operations.  
 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.  
 12 There are strong reasons for building  
 13 microgrids or none at all, but that is a different  
 14 chapter.  
 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.  
 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.  
 24 And I also request that the deadline be  
 25 extended because summer is a very busy time for many

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1 people along this route. Thank you.  
 2 HEARING OFFICER WEBSTER: Thank you.  
 3 I have received an additional comment request  
 4 So we'll hear from Fuji Kreider.  
 5 MS. FUJI KREIDER: Good evening. Fuji  
 6 Kreider, 60366 Marvin Road, La Grande.  
 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.  
 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.  
 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.

*at a friend's request*

*11. - 1*

A myriad of reasons Idaho Power's preferred route should not be approved have been presented in previous testimony. My remarks primarily concern Id P's reason for choosing this particular route--"it is the least costly for them."

Their cost estimation, however, completely ignores the truly important costs--that to the people who live all along <sup>the</sup> that line. And YES, We The People matter! We live and work here, we pay taxes, we are engaged in volunteer activities that make our communities better, we own businesses, farms, ranches, homes. We might have been born here--or we choose to live here, often because of the natural beauty that surrounds us. We have a quality of life that is not found in urban areas.

Should this line be built as proposed, the quality of life will be greatly diminished.

Most of the land along the preferred route is owned by private persons, with very little being public. What right does a corporation have to usurp our private lands--this land individuals have cared for and that provides a livelihood and/or a place of refuge--our homes?

*understand*  
I see Eminent Domain as <sup>a privilege for</sup> belonging only to the gov't--which theoretically is for the public's good. Corporations should NOT have the capability to TAKE FROM PRIVATE PERSONS!!! The cost is great--and, immeasurable.  
*to us*

My MN story, which I share because it is similar to millions ~~of these~~ other citizens have experienced and I really hope people who live along the proposed route won't have to. You have heard from many <sup>in</sup> from the Eastern Oregon counties speak to this personally. *e.g., a tower being built where a house stands!*

I grew up on a farm in the Red River Valley--flat land with rich soil. In the late 60s (I had moved away by then) the freeway began to be built in the area. It cut through my parents' half section--leaving a 40-acre triangle on one side of the

freeway and the majority of acres in a triangle on the other. This ultimately resulted in a 4-mile drive—often with farm equipment—each way to get to the smaller acreage, thus adding more time and cost as well as inconvenience of farming the smaller section. The same applied to farming triangles—more costs, more time—being much less efficient than farming a rectangle.

In MN, we get rain and therefore have deep and wide ditches. The freeway construction screwed up the drainage system which wasn't "fixed" until 1996—when my mother had to pay \$90/acre to have it done. There was no governmental compensation for any of these added expenses—which exist even today.

From the time my parents knew their land was going to be taken until probably her death, my mother was upset and often angry—affecting all around her. The inconvenience, the extra costs, the constant noise, the pollution caused by the diesel vehicles... When Mom moved to town, my nephew moved to the farm and although he planted even more rows of trees to block the noise, it bothered him and he ~~ultimately~~ *eventually* moved.

Yesterday I asked a local counselor if she was seeing more people who were depressed or angry about this proposed B2H line. She said yes, whenever there were additional stresses that caused people to feel helpless her business increased.

Our property in adjacent to the freeway, near Ladd Canyon. We look out on the Foothills; I drive Foothill Road home whenever possible. The scenicness relaxes me and is a type of meditation. Should the power line be constructed along ~~there~~, the scenic value would be ruined.

*The block title*

*stress-related health issues*

These costs—emotional, personal hurt, inconveniences, extra work, immediate and ongoing expenses as well as long-term effects we can't yet know—add up! They take a toll on us, the citizens. Idaho Power will NOT be compensating for these costs, ~~some~~ *many* of which can not be paid for with money. Most landowners

would also not have the resources to sue for damages, farming and ranching not being lucrative operations.

*to conclude with these questions!*

Do WE, THE PEOPLE, not count? Does Idaho Power have the right to determine the negative impacts on our environment and our personal lives?

I have heard ~~that~~ the Grande Ronde Valley is the largest circular valley in the U.S. PLEASE help us keep ~~it~~ its natural beauty and not be scarred by the ugly monstrosities Idaho Power wants to erect in this very scenic area. There are other options if, indeed, this line has to be built at all. There are strong reasons for building microgrids--or none at all--but that's a different chapter.

With all the testimonies you have heard--~~and I hope it has been active listening~~--you must have a strong sense of the devastating impact this power line would have on the natural lands and all the critters, including humans, who would be affected should it be built as Idaho Power wishes. HEAR US.

Margaret L. Mead  
57744 Foothill Road  
La Grande, OR 97850  
541-910-6454  
[summersowwinterweave@gmail.com](mailto:summersowwinterweave@gmail.com)  
26 June 2019

Kellen Taerdaewether, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol St. NE  
Salem, Oregon 97301  
Email: B2HDPOComments@Oregon.gov

AGRICULTURAL LAND PERMANENTLY LOST DUE PLACEMENT OF TOWERS IN  
FIELDS; LOST PRODUCTION AND FRUSTRATION ARE NOT ADEQUATELY  
ADDRESSED,

Issue Statement

Idaho Power only includes the area of the transmission tower bases as a permanent impact. The area of permanent impact is significantly larger than this. It needs to include the gravel area around the transmission towers as well as the fact that equipment cannot make the sharp curves and their land is often divided into two parcels which makes preparing, planting and harvest of the crops difficult, costly and time consuming.

Related Statutes and Rules:  
OAR 345-022-0030

Agricultural operations rely upon large equipment for working the soil, planting and harvesting crops. The transmission towers will preclude the use of land around the transmission towers from being accessed due to the turning radius and avoidance of making contact with the support structures. The land permanently converted in agricultural areas needs to include the area surrounding the towers where agricultural operations will not be practical due to the limits of equipment and the avoidance of the barrier posed by the structures. See Section K 5.7.1

This issue needs to be included in the evaluation of the impacts to agricultural lands that increase the costs of doing business and change the normal process for working fields.

*Margaret L Mead*

*Margaret L Mead  
5714 South Hill Road  
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](mailto: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: Margaret L Mead  
Mailing Address: 57744 Foothill Rd  
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  
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Signature

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Mailing Address: 57744 South Hill Road  
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](mailto: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.

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

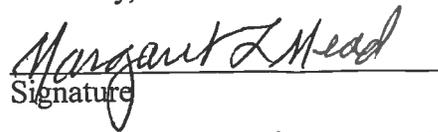
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Sincerely,

  
Signature

Printed Name: Margaret L Mead  
Mailing Address: 57744 Foothill Road  
La Grande OR 97850

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

August 5, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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

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

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

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

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

**ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:**

**Idaho Power will determine baseline flow of natural springs or wells within 1/4 mile of blasting site.**

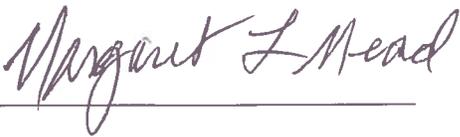
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire 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: Margaret L Mead  
Address: 57744 Foothill Road  
La Grande OR 97850

Kellen Tardaewether, 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,

*Margaret L Mead*

Name: *Margaret L Mead*

Address: *55744 Foothill Road  
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](mailto: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: Margaret L Mead

Mailing Address: 5774 Foothill Rd  
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](mailto: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

Margaret L Mead  
Printed Name:

Mailing Address: 57744 Foothill Rd  
La Grande OR 97652

**References**

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

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

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

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

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

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

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

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

August 5, 2019

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

[B2H.DPOComments@Oregon.gov](mailto: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 8<sup>th</sup> 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](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: Margaret L Mead

Address: 57744 Southhill Rd  
La Grande, OR. 97850

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol St. NE  
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**THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE**

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

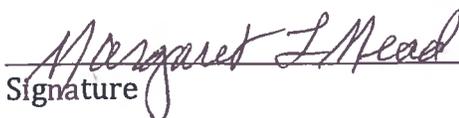
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming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

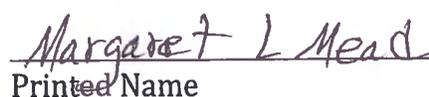
In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

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

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

  
Signature

  
Printed Name

Mailing Address:

57744 Foothill Road  
Le Grand OR 97852

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](mailto:B2H.DPOComments@Oregon.gov)

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

Sincerely,

  
Name Margaret L Mead  
Address 57744 Foothill Rd  
La Grande OR 97650

August 2, 2019

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

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

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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.

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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

Margaret L Mead  
Printed Name

Mailing Address:

57744 Foothill Road  
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) Christine Manofascina

Mailing Address (mandatory) PO Box 884  
Baker City OR 9784

Phone Number (optional) ( ) \_\_\_\_\_ Email Address (optional) christine-m.201

Today's Date: 6-19-19 @ gmaill.com

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

Written comments can also be submitted today. I will  
All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to CM

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](mailto: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)

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1 you provided your address at the outset but if you could  
 2 do that.  
 3 MR. BRUCE NICKELS: I live at 1140 F Street in  
 4 Baker City, Oregon. I am a Baker County Commissioner.  
 5 And I have a phone number and everybody can call me and  
 6 talk to me about it.  
 7 Thank you.  
 8 HEARING OFFICER WEBSTER: Thank you,  
 9 Mr. Nickels.  
 10 And did you want to --  
 11 MS. CHRISTINE MENOLASCINA: Yes.  
 12 HEARING OFFICER WEBSTER: So this is, is it  
 13 Christine Menolascina?  
 14 MS. CHRISTINE MENOLASCINA: Menolascina.  
 15 HEARING OFFICER WEBSTER: Menolascina, okay.  
 16 We'll hear from Ms. Menolascina and then we  
 17 will also hear from Fuji Kreider before we -- I'm going  
 18 to have Idaho Power go last just so it can have the  
 19 opportunity to respond to some of the concerns that have  
 20 been raised. So if you want to have a seat.  
 21 MS. CHRISTINE MENOLASCINA: I'll stand. It's  
 22 Christine, C-h-r-i-s-t-i-n-e, Menolascina is  
 23 M-e-n-o-l-a-s-c-i-n-a.  
 24 HEARING OFFICER WEBSTER: If you could provide  
 25 an address for us, please.

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1 MR. CHRISTINE MENOLASCINA: Um-hmm. It's PO  
 2 Box 84, Baker City, Oregon 97814.  
 3 HEARING OFFICER WEBSTER: Thank you.  
 4 MS. CHRISTINE MENOLASCINA: Hi. So here in  
 5 Baker, I think people have felt railroaded a little bit.  
 6 I've known this meeting is coming. I didn't know about  
 7 the previous meetings.  
 8 So my understanding is Idaho Power needs more  
 9 power for its citizens, and it does have some of eastern  
 10 Oregon, Malheur County, which is I believe east of here,  
 11 more Ontario, and then to Blackfoot, Idaho. So it  
 12 really doesn't affect too much of Baker or Boardman, or  
 13 any of the beautiful land it will be going through.  
 14 Though a lot of it will be on irrigation and  
 15 farmland, a lot of it will be going through some of our  
 16 favorite places; La Grande, Pendleton, over the  
 17 mountains, where truck drivers from all over the country  
 18 see that, travelers from all over the country see that.  
 19 Down 84 here where people traveling from Utah, Idaho,  
 20 and everywhere else go down this freeway.  
 21 I understand it goes through Morgan Lake, one  
 22 of my favorite fishing places, along with probably many  
 23 others that people aren't aware of, because a lot of  
 24 people don't get the paper here or a lot of people don't  
 25 think that it will affect them. But when the windmills

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1 were put up not far from here, just up on the ridge, I'm  
 2 sure everybody can point out where it is or what they  
 3 call the Stonehenge snow fence, which was an eyesore and  
 4 not correctly placed, was put along 84 up here.  
 5 People do notice. But they're at home sitting  
 6 on Facebook pushing "like," but I am not; I am here  
 7 because this is what makes a difference.  
 8 So my question is, since everybody is here --  
 9 is there a representative from Idaho Power here? No?  
 10 HEARING OFFICER WEBSTER: No, I believe we  
 11 will hear from somebody from Idaho Power.  
 12 MS. CHRISTINE MENOLASCINA: And there is  
 13 somebody here in this room that can hear my voice?  
 14 HEARING OFFICER WEBSTER: Yes.  
 15 MS. CHRISTINE MENOLASCINA: Okay. So to that  
 16 person who has pitched a bid to whoever to build these  
 17 and start finding out everything there is to know about  
 18 where to put 80 towers, how many towers are there going  
 19 to be in Baker County? How many towers are there going  
 20 to be from Boardman to the border? How many towers  
 21 along 84? How many towers along a mile?  
 22 There are federal regulations that I'm sure  
 23 that they know about. State regulations. I grew up in  
 24 southern California; I know these towers. They are  
 25 God-awful, unsightly, noisy, cancer-causing interruption

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1 of solitude and peace of mind, knowing that something is  
 2 humming overhead, drawing power from out of your area,  
 3 crossing through your yards, over your children, your  
 4 food, your house, your land, to eastern Idaho. Where in  
 5 return, they will give us, we can draw off the solar  
 6 power, 4 percent they get from solar power which they  
 7 buy from Phoenix because they can't guarantee sunshine.  
 8 We're in Oregon; nobody guarantees sunshine.  
 9 So why not run it down the Snake River?  
 10 Because it's a couple miles shorter. Why not run it  
 11 through eastern Washington and down the border? Because  
 12 it affects everybody. Yes, everybody needs power. I  
 13 use blow dryers, I like coffee in the morning, everybody  
 14 does. But these are gigantic, monster towers. And you  
 15 don't put just one or we don't know how many, somebody  
 16 knows. I have a friend who puts up solar or puts up the  
 17 windmills, and before it even hits the table, those  
 18 engineers know that -- this is what I was told -- it  
 19 depends on how many feet it rises above the previous  
 20 tower.  
 21 Now, we all go to La Grande to go shopping at  
 22 Walmart because we have one grocery store in this town.  
 23 So going from Walmart, do you think you're going to stay  
 24 the same level or do you think you go up 2 feet, 5 feet,  
 25 a hundred feet? How many towers are going to go in

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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.

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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.

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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

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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

## TARDAEWETHER Kellen \* ODOE

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**From:** Carol Messinger <carolmessinger@gmail.com>  
**Sent:** Monday, August 19, 2019 6:24 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Idaho Power Application 9/28/2018

August 19, 2019

Dear Chairman Beyeler and Members of the Council,

I appreciate this opportunity to comment on the B2H Draft Proposed Order. I have chosen to not use a template letter but rather express my personal views, limited in scope that they are.

I am not as well versed on this subject as some....I have not read every document. However, I do understand the impact this line will have on this particular area of Oregon, i.e. the Grande Ronde valley and La Grande. The lines will not only be a visual disturbance to the "Valley of Peace" as it is called by the original inhabitants, but it will bisect the trail and cause some to have to deal with noise pollution, etc.

It therefore seems to be not extreme to ask that the route be changed to one of the other routes first proposed, one I believe is called the BLM preferred route. This route does not affect the population nor the scenery nor the trail as much. It is placed further south and away from population.

Please consider this idea as a strong collaborative approach to a specific area of concern with the Draft Proposal as it now stands.

Yours sincerely,

Carol Lynn Messinger  
Summerville, Or.  
541-534-5541



# 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) Anita Metten

Mailing Address (mandatory) 65208 Hael Lane  
Embler, OR 97841

Phone Number (optional) ( ) \_\_\_\_\_ Email Address (optional) \_\_\_\_\_

Today's Date: 6-20-19

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

Written comments can also be submitted today.

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

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

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1 preparing for tonight, I pulled up some comments that I  
 2 had written earlier. And these comments, I won't  
 3 provide them tonight because I printed them out on some  
 4 other stuff I'd prefer not to share with you. But I've  
 5 already sent them to you. And these are dated  
 6 September 2010. I'm not going to read them, I'm just  
 7 going to use them as a cheat sheet for myself to page  
 8 through some of the topics that I want to cover.  
 9 I'm going to focus on forests and the  
 10 grasslands and the wildlife and the fish. Just in terms  
 11 of background, I have a bachelor's degree from Cornell  
 12 University, where I studied forestry and arboriculture.  
 13 I have been a certified arborist in good standing for  
 14 the last 23 years. I have lived and worked in northeast  
 15 Oregon for almost 40 years, and during that time I have  
 16 studied extensively the forests and the grasslands of  
 17 this area.  
 18 One of the most important aspects of our  
 19 ecosystems is the connectivity of a variety, a wide  
 20 variety of habitat we have here, forests and  
 21 non-forests. And connectivity is the way that plants  
 22 and animals can move across the landscape. As we  
 23 continue to see the effects of climate change, that  
 24 connectivity is going to be so much more important.  
 25 Constructing a power line through the middle

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1 of these native forests and grasslands goes right  
 2 against the concept of connectivity because by the  
 3 nature of it you are disrupting it, you are creating a  
 4 barrier.  
 5 It was mentioned earlier that in the forested  
 6 areas that the right-of-way would be 300 feet wide. And  
 7 in layman's terms what that means is there is going to  
 8 be a 300-foot wide clear-cut through all the forests  
 9 that this power line crosses. 300 feet is the length of  
 10 a football field. So if you stand at the zero yard line  
 11 and you are looking clear down to the other end of the  
 12 100-yard football field, that is going to be width of  
 13 the clear-cut through the forest.  
 14 Personally I feel like clear-cuts are not a  
 15 good thing to begin with, but under a power line it's  
 16 always going to be a clear-cut, and it's going to be  
 17 maintained either by cutting down the trees and shrubs  
 18 that grow back in or spraying with herbicide. Herbicide  
 19 is a necessary tool, but it comes with a lot of  
 20 environmental damages, and creating a new magnet for  
 21 herbicide is really just a bad idea.  
 22 I have reviewed the environmental impact  
 23 statement, and I objected, we objected to the national  
 24 forest decision on this project. And one of the reasons  
 25 we did is because several hundred acres of national

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1 forest, our shared public lands, will be clear-cut as a  
 2 part of this project and will be maintained in a  
 3 non-forest condition.  
 4 Also, the Forest Service has waived their  
 5 requirements for protecting riparian areas, and they  
 6 waive their protections for large trees and older trees  
 7 with this project.  
 8 I have looked at the new draft proposed order  
 9 for the project. I have not found a total on the  
 10 acreage of private land forests that will be clear-cut,  
 11 but I assume it's extensive also. These are really  
 12 important ecological damages that will result in this  
 13 project.  
 14 Let's see, just to name a few wildlife  
 15 species, sage-grouse down in Baker County. In Union  
 16 County this line would cross some of the most important  
 17 and the most valuable elk habitat in the state of  
 18 Oregon, just south of La Grande here. And pronghorn  
 19 antelope and mule deer, they all need habitat, they all  
 20 need to be able to migrate, they all need connectivity  
 21 of habitat. And this line would severely damage all of  
 22 those functions.  
 23 I did want to read one section that I wrote  
 24 8 years ago, 9 years ago. It says: "Rural Oregon tends  
 25 to have higher poverty rates, lower wages and higher

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1 unemployment than the urban areas where the electricity  
 2 would be shipped. Environmental justice is not served  
 3 when these rural areas are saddled with the  
 4 environmental cost of a transmission line and more  
 5 affluent urban areas are the primary beneficiaries."  
 6 That remains true, and that is just not right.  
 7 So my time is almost up. In conclusion, I  
 8 would just -- I hope -- again, I want to thank you for  
 9 coming and listening, coming to the community where we  
 10 all live.  
 11 I mentioned some of the challenges we face in  
 12 the community, but we are a strong community. So I urge  
 13 you to do the right thing and prevent this line from  
 14 being built.  
 15 Thank you.  
 16 HEARING OFFICER WEBSTER: Thank you.  
 17 Following Ms. Metlen we will have Joe Horst,  
 18 and I think we will do one more after Mr. Horst. We'll  
 19 hear from Gail Carbiener, then we will take our break.  
 20 MS. ANITA METLEN: Good evening. Thank you  
 21 for hearing me and allowing all my fellow community  
 22 members to make comments on this project. My name is  
 23 Anita Metlen. I live at 65208 Hull Lane, Imbler, Oregon  
 24 97841.  
 25 I strongly agree with all the previous

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1 comments about fire and environment and the viewsheds.  
 2 I have lived in this valley for 43 years. I've been a  
 3 business owner, I have raised a family. Two of those  
 4 businesses do involve tourism and serving local people.  
 5 Those people enjoy the benefits of Morgan Lake, the  
 6 wilderness area, Ladd Marsh, the Oregon Trail, the  
 7 scenic bikeways and scenic byways that crisscross this  
 8 area. These are all very important to our culture here.  
 9 And Glass Hill, Glass Hill is also something that we all  
 10 gaze upon and truly enjoy.  
 11 My comment is that I am opposed to  
 12 installation of this transmission line. My greatest  
 13 concern is the damage that the system would cause to the  
 14 viewshed or the countryside in which it travels through.  
 15 I would encourage you to look to other options. I know  
 16 that solar panels, batteries, and all these kinds of  
 17 options are now available.  
 18 But have you even thought to maybe aboveground  
 19 type conduit? Like within a house you can have conduit,  
 20 where you have transportation of your power, but it is  
 21 less visible. Yes, there would still be some issues,  
 22 but at least we wouldn't all have to look at it all the  
 23 time.  
 24 So rural areas are dependent upon tourism.  
 25 Tourism in 2014 was \$12.8 billion worth of the economy

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1 in Oregon. Certainly we have a portion of that.  
 2 Tourists do not travel to ponder the power grid. And  
 3 those of us who live in the rural area made a choice to  
 4 live here where the countryside is not marred by manmade  
 5 structures. Please do not ruin the viewshed for  
 6 eternity for your towers and lines.  
 7 Our future is the continued livability of the  
 8 place that we live, work, and play. Our future requires  
 9 that we maintain the viewshed that is not marred by  
 10 large unsightly towers and miles of wire.  
 11 So your plan is to plan for the future; our  
 12 plan is to protect our future.  
 13 Thank you.  
 14 HEARING OFFICER WEBSTER: Thank you.  
 15 MR. JOE HORST: Hello. My name is Joe Horst.  
 16 I live at 87 Hawthorne Drive. My house and property  
 17 sits right next to where their proposed tensioning  
 18 station lines are going to be. Because of where it is  
 19 we will be able to see at least a couple of the towers  
 20 from our property.  
 21 In 2002, I bought 135 acres right there. It's  
 22 up here on the hill, and the Oregon Trail -- there's two  
 23 reasons I bought it, and one was the view, it was really  
 24 good; the other one was the Oregon Trail came across it,  
 25 which really intrigued me. And I very shortly

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1 thereafter contacted the Oregon Trail Society. They  
 2 came and marked off the trail. So I've had this little  
 3 piece of heaven up there.  
 4 In 2014, my wife and I decided to build,  
 5 rebuild our house or we actually entertained the idea of  
 6 building on another piece of property, having 2 acres up  
 7 there and a lot of places we could build with a view, we  
 8 decided to go ahead and rebuild the house where it is,  
 9 not knowing what the future had in store. We could have  
 10 built the house on another section of property.  
 11 The first time that I was ever -- on May 5th  
 12 of 2016, I got a letter from Idaho Power about -- and  
 13 this is the first time I ever heard anything about this  
 14 project, ever. And it was a very short letter. It just  
 15 said that -- they put bold letters in the middle of the  
 16 letter, it said: "Permission to enter your property for  
 17 survey and information gathering does not constitute  
 18 your consent to grant a future easement."  
 19 So I didn't think too much about it, but there  
 20 was a name on there. I contacted a gentleman at Idaho  
 21 Power named Mike Takac for more information. And we  
 22 talked about it, and I said the Oregon Trail came across  
 23 my property and this and that. And he said, Well, I  
 24 guess we'll have to find another place to build the  
 25 line. He said, what he said was, We will have to find

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1 another route. So I didn't think anything about it, as  
 2 far as I know, it's a done deal.  
 3 On December 16, 2016, I received a second  
 4 letter with some maps, and it showed a -- they weren't  
 5 very detailed, they were pretty vague, and neither the  
 6 proposed route or the alternative route came near my  
 7 property on those maps. This letter was very short and  
 8 a bunch of legal jargon, but it had a questionnaire  
 9 which pertained to farming. I didn't fill it out or  
 10 anything.  
 11 Then the very next letter I received was on  
 12 May 12th of 2017, and the letter said it was contacting  
 13 landowners whose property may be crossed by this  
 14 project. At this time I was contacted by somebody from  
 15 Idaho Power. He was actually contracted to come talk to  
 16 me. And this is when he actually started talking to me  
 17 about the tensioning station. So I went ahead and sat  
 18 down and talked to him. And as it comes out, they want  
 19 to use the road coming up to our house, where it comes  
 20 right past our house, literally 20 feet from our front  
 21 door, 10 feet from our well, with big heavy trucks and  
 22 everything. And because of the tensioning station  
 23 building built, according to Idaho Power, could be as  
 24 many as 160 vehicles per day. That's what they said.  
 25 The other issue I have on that particular deal

June 20, 2019

B2H Committee

*Thank you*  
Dear Sirs,

*Agreement with other presenters*

Your claim is to plan for future. Our plan is to protect our future.

*- 1/3 yrs. MWP - RR - our personal use, great to area*

I am opposed to the installation of this transmission line. My greatest concern is the damaged that the system would cause to the view shed for the countryside that it travels through. If the lines could be buried or existing tower lines enhanced to serve your purpose that would be much better alternative.

I also question the need for the line. Solar farms are providing power that can be directed to areas of use that do not require such a lengthy carrier system.

*12.8 Billion - 2014 Stats*

Rural areas are dependent upon tourism. Tourists do not travel to ponder a power grid. Those who live in rural areas made the choice to live where the countryside is not marred by manmade structures. Please do not ruin the view shed for eternity with your towers and lines. Our future is the continued livability of the place we live, work and play. Our future requires that we maintain a view shed that is not marred by large unsightly towers and miles of wire.

Sincerely and with great concern,

Anita Metlen

65208 Hull Lane  
Imbler, OR 97841  
[metlenam@gmail.com](mailto:metlenam@gmail.com)  
541.910.0089

*Suggestion: Think outside the box -*

*Devise a method to install the line on the ground in a conduit of some type.*

## TARDAEWETHER Kellen \* ODOE

---

**From:** TARDAEWETHER Kellen \* ODOE  
**Sent:** Wednesday, July 24, 2019 2:35 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** FW: B2H  
**Attachments:** 2019b2hletter.docx



**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



Stay connected!

---

**From:** Max Farbman <[mfarbman@enviroissues.com](mailto:mfarbman@enviroissues.com)>  
**Sent:** Wednesday, July 24, 2019 2:31 PM  
**To:** TARDAEWETHER Kellen \* ODOE <[Kellen.Tardaewether@oregon.gov](mailto:Kellen.Tardaewether@oregon.gov)>  
**Cc:** Maffuccio, Jeff <[jmaffuccio@idahopower.com](mailto:jmaffuccio@idahopower.com)>; Berg, Sven <[sberg@IdahoPower.com](mailto:sberg@IdahoPower.com)>; Bridger Wineman <[bwineman@enviroissues.com](mailto:bwineman@enviroissues.com)>  
**Subject:** FW: B2H

Hi Kellen,

Just a heads-up that we received this letter for the ODOE process in the IPC inbox. It looks like it also went to the ODOE DPO email but we wanted to send it along just in case.

Thanks,  
Max

---

**From:** Anita Metlen <[a.m.twigg@hotmail.com](mailto:a.m.twigg@hotmail.com)>  
**Sent:** Wednesday, July 24, 2019 10:13 AM  
**To:** [ipc@boardmantohemingway.com](mailto:ipc@boardmantohemingway.com)  
**Subject:** B2H

Sent from [Mail](#) for Windows 10

July 23, 2019  
Energy Facilities Siting Analyst  
c/o Kellen Tardaewether, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol St N.E  
Sale,, 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 Proposed Order.

Dear Chair Beyeler and Members of the Council:

Topic: Create power close to the areas your serve. Build short transmission lines to serve those areas.

Your claim is to plan for future. Our goal is to preserve and protect our future. The proposal states that no significant impact will be realized by the construction of the transmission line nor no significant impact on those who live near the line. How do you explain that riding a bike under the power lines causes the gear shift mechanism on my bike not to work? Or that my hands tingle while I am under the lines. My greatest concern is the damaged that the system would cause to the view shed for the countryside that the transmission line travels through and the impacts of constructing the facility.

Tourism in Oregon is a \$12.3 Billion industry that benefits rural areas the most. See below.

## **The Power of Travel and Tourism**

The Power of Oregon's Travel and Tourism industry is felt throughout the state. The \$12.3 billion industry directly generates more than 115,400 jobs in Oregon.

Tourism jobs are crucial for economic growth, especially in rural counties, where tourism is one of the three largest industries. These jobs provide a training ground for Oregon's future workforce, empowering younger workers to build solid work habits and demonstrate a professional work ethic. These meaningful tourism industry jobs also provide flexibility for seniors, parents, students and other workers. What's more, tourism jobs provide vibrant career paths for rewarding and fulfilling professions

later. Industry news by Linea Gagliano *Director, Global Communications*  
[.linea@traveloregon.com](mailto:.linea@traveloregon.com)

Tourism has continued to grow an average of 4% annually. Our rural area is dependent upon tourism and agriculture. Tourists do not travel to ponder a power grid. They come for scenic beauty and the opportunity to leave manmade structures behind.

Livability is the reason we live in NE Oregon. Those who live in rural areas of Baker, Union, Umatilla counties made the choice to live where the countryside is not marred by manmade structures. Please do not ruin the view shed for eternity with your towers and lines. Our future is the continued livability of the place we live, work and play. Our future requires that we maintain a view shed that is not marred by large unsightly towers and miles of wire for those who live here and those who pass through and visit.

**Alternatives to the present proposal**

**-DEVELOP SOLAR FARMS IN IDAHO WITH SHORT TRANSPORTATION LINES TO SERVE CUSTOMERS CLOSE TO THE GENERATION SOURCE.**

**-DEVELOP WIND FARMS WITH SHORT TRANSPORTATION LINES TO SERVE YOUR CUSTOMER BASE.**

**-BURY THE LINES.**

**-REFURBISH EXISTING TOWER LINES TO SERVE THE INCREASED CAPACITY.**

In conclusion I believe it is our task to protect and preserve our future by maintaining our view shed for future generations. It is your task to be a good neighbor and not ruin the livability of NE Oregon. Convert to power generation methods that serve your customers by generating power closer to your customers so that short transportation lines can be built in the area where the power is used.

Sincerely,

**Kim Metlen**

65208 Hull Lane  
Imbler, OR 97841  
oregoneastcycling@hotmail.com  
541.910.0981..

**TARDAEWETHER Kellen \* ODOE**

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**From:** Karen Meyer <karen@greenfireproductions.org>  
**Sent:** Friday, August 16, 2019 12:23 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 May 23, 2019.  
**Attachments:** Comments-Karen-Anspacher-Meyer.pdf

Please find the attached comments on the Boardman to Hemingway Transmission Project.

Thank you,  
Karen Anspacher-Meyer

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

[B2H.DPOComments@Oregon.gov](mailto: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. I have lived in La Grande for 14 years, My house is at the edge of the city limits and very close to the proposed project. I am greatly concerned about this proposed transmission line for a number of reasons. I will focus on slope stability and risk of wildfire in this letter.

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 8<sup>th</sup> 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](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.

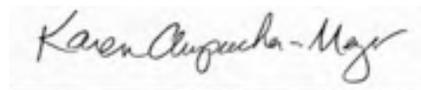
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

A handwritten signature in black ink that reads "Karen Anspacher-Meyer". The signature is written in a cursive style and is positioned above a thin horizontal line.

Karen Anspacher-Meyer  
308 C Avenue  
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) MICHAEL MEYER

Mailing Address (mandatory) Grove St, Baker City

Phone Number (optional) ( ) \_\_\_\_\_ Email Address (optional) \_\_\_\_\_

Today's Date: \_\_\_\_\_

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](mailto: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.)

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1 HEARING OFFICER WEBSTER: Thank you.  
 2 After Mr. Meyer, we will hear from Laurie, is  
 3 it Solisz?  
 4 MR. MIKE MEYER: My name is Mike Meyer. I  
 5 live in Baker City. This will be one of them less  
 6 effective comments.  
 7 HEARING OFFICER WEBSTER: Mr. Meyer, I think  
 8 just for the record we do need an address more specific  
 9 than just Baker City.  
 10 MR. MIKE MEYER: And why do you need my  
 11 address?  
 12 HEARING OFFICER WEBSTER: So that we can  
 13 provide you notice of the things that are happening.  
 14 MR. MIKE MEYER: Do I -- mailing address?  
 15 HEARING OFFICER WEBSTER: Mailing address.  
 16 MR. MIKE MEYER: Mailing address?  
 17 HEARING OFFICER WEBSTER: Yes.  
 18 MR. MIKE MEYER: Is 3155 Grove Street, Baker  
 19 City, Oregon.  
 20 HEARING OFFICER WEBSTER: Thank you.  
 21 MR. MIKE MEYER: I find it unfathomable that  
 22 anyone from Idaho, including Idaho Power, has the  
 23 audacity to rape 71 miles of Baker County with what I  
 24 think will be unnecessary and outdated towers by the  
 25 time they're ever put in. And I also would like to

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1 shame anyone that would ever permit this to happen.  
 2 Thank you.  
 3 HEARING OFFICER WEBSTER: Thank you.  
 4 Following Ms. Solisz, we'll hear from Gail, is  
 5 it Carbiener?  
 6 MR. GAIL CARBIENER: Close.  
 7 HEARING OFFICER WEBSTER: Sorry for maiming  
 8 names.  
 9 MS. LAURIE SOLISZ: My name is Laurie Solisz.  
 10 I'm a direct descendent of the land that this is going  
 11 to go across. My mailing address is P.O. Box 1110,  
 12 Baker County, Oregon.  
 13 So what I have brought today, I'm not very  
 14 high tech, but I have provided some pictures of how this  
 15 will impact our property, which is directly below the  
 16 Interpretive Center. I have four pictures here, and the  
 17 shadow, which is so interesting how this works, this is  
 18 what happens in the morning, sunrise, the shadow falls  
 19 directly on the line where the transmission line is  
 20 proposed, which I find very fascinating.  
 21 We don't have -- we just -- and this is a  
 22 picture of how the line will go across these hills. And  
 23 I will leave these pictures with you. The little bump  
 24 on the hill is the Interpretive Center. So if anyone  
 25 thinks that this isn't going to interrupt what's going

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1 on with the Interpretive Center, which is a beautiful  
 2 museum -- and if you people are not from here, I would  
 3 highly recommend you going there. It is so inspiring.  
 4 I cry every time I go. This bump is the Interpretive  
 5 Center. So this is looking east. The Interpretive  
 6 Center looks west, which is the towers are going to come  
 7 up, supposedly not be able to be seen, under the  
 8 Interpretive Center.  
 9 So we have about 300 acres. We already bear,  
 10 our particular property already bears the burden of the  
 11 high-voltage 230 line. That was placed in 1950. That  
 12 line, they gave my ancestors, who thought it was a good  
 13 idea to help get electricity, a little bit of money.  
 14 However, 60 years later, we still have the line on our  
 15 property. It impacts our ability to do crops, it  
 16 interrupts our grazing. They were sagging close to the  
 17 ground. My husband was in jeopardy on his tractor this  
 18 last year. There's not much maintenance that goes on  
 19 with these lines.  
 20 So the B2H, and you've already heard about the  
 21 right-of-way difficulties that are going to be expected.  
 22 We've already had impact from the B2H; people, they've  
 23 entered our land without permission, claimed ignorance,  
 24 they drive on our property, they've flown over with  
 25 helicopters, interrupted the cattle. So we've already

Page 49

1 experienced disturbance. And everyone claims ignorance,  
 2 Oh, we didn't mean to do that. Well, we didn't think,  
 3 and so forth. But it happens, and we are the ones that  
 4 bear that burden.  
 5 Well, I guess I ran through all my thoughts.  
 6 Any questions?  
 7 HEARING OFFICER WEBSTER: Do you want to leave  
 8 the photos?  
 9 MS. LAURIE SOLISZ: I would.  
 10 And if you have any questions, you can always  
 11 ask.  
 12 HEARING OFFICER WEBSTER: Any questions,  
 13 Council? Thank you.  
 14 MS. LAURIE SOLISZ: Thank you for listening.  
 15 Thanks for coming.  
 16 HEARING OFFICER WEBSTER: We will next, after  
 17 we hear from you, we will hear from Wayne -- is it  
 18 Kaaen?  
 19 MR. WAYNE KAAEN: You're doing good on the  
 20 names.  
 21 HEARING OFFICER WEBSTER: Thank you.  
 22 MR. GAIL CARBIENER: My name is Gail  
 23 Carbiener. I live in Bend, Oregon, on 2920 Northeast  
 24 Connors Avenue. I represent the Oregon-California  
 25 Trails Association. I have been before the Council

## **TARDAEWETHER Kellen \* ODOE**

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**From:** Meyers, Mike (Mike Meyers) <mike.meyers@tennessee.edu>  
**Sent:** Saturday, August 10, 2019 1:22 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Regarding the Boardman to Hemingway Transmission Line

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy  
550 Capitol St N.E.  
Salem, OR 97301

I am a partial owner of a tract of land that would be crossed by the Boardman to Hemingway Transmission Line (Morrow County Detailed Map 11, HARTLEY KATHLEEN LYNN ETAL 01N26E000000401). I share the comments in opposition provided by family member and adjoining landowner Brian Doherty to the EFSC at the June 27, 2019, meeting in Boardman.

My cousin Brian has detailed the many economic hardships visited upon the owners and farmers of this land at the hands of the state and federal government. This is worst of those, even poorer than the ridiculously small compensation provided to my father Peter Meyers on our farm in Umatilla County when Interstate 80N was constructed through our family farm. I think the take it or leave it offer at that time was \$4.00 per acre.

In summary, the project will permanently change the landscape and usefulness of our property. It will limit future development opportunities on our property. It will make farming more expensive, less efficient, and our production will be lower. We can't afford that.

Please ensure that the ongoing compensation system proposed by Brian Doherty and others is implemented.

If the state of Oregon is going to approve Boardman to Hemingway, please ensure that every conceivable and possible measure is taken to protect the landowners and the citizens of Oregon.

Sincerely,

Mike Meyers

University of Tennessee

Institute for Public Service

Sent from [Mail](#) for Windows 10

## TARDAEWETHER Kellen \* ODOE

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**From:** bpmeyers <bpmeyers@q.com>  
**Sent:** Monday, August 19, 2019 5:23 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Brian Doherty

This is in support of the opposition of the proposed transmission line through the Morrow county land which I am a landowner . I was never contacted about this and am against this as it represents an unreasonable seizure of land without adequate compensation. As stated in the comments from Brian Doherty this property has experienced many previous intrusions that have negatively impacted the ability to successfully farm this land. A generational property should not have to lose production without recognition of all the previous sacrifices this family has made over many decades.

Sent from my Verizon, Samsung Galaxy smartphone

**ESTERSON Sarah \* ODOE**

---

**From:** bpmeyers <bpmeyers@q.com>  
**Sent:** Wednesday, August 21, 2019 1:16 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Proposed transmission line

This is in support of comments from Brian Doherty about the new transmission line through the Morrow county property I am a partial owner of. I was never notified and stand in opposition for all the reasons Brian listed. Adequate compensation for the generations of cooperation from this family should reflect all they've done over the years.

Sent from my Verizon, Samsung Galaxy smartphone

## TARDAEWETHER Kellen \* ODOE

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**From:** John Milbert <jmfisherman9@gmail.com>  
**Sent:** Monday, August 12, 2019 10:57 AM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Letter of Protest

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

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

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

Dear Chair Beyeler and Members of the Council:

I respectfully request that this letter protesting issuance of a Site Certificate for the proposed Boardman to Hemingway Transmission Project be entered on the record.

Specifically, the applicant has failed to acknowledge the presence of a Federal and State-listed Threatened species, and has failed to identify Category-1, Critical Habitat.

The Draft Proposed Order (DPO), p. 304, lines 20-26, fails to list Bull Trout, a listed State-Sensitive Threatened Species, also listed as Threatened by USFWS. OAR-345-021-0010 (1)(p) requires identification of all fish and wildlife at the proposed location, and identification of habitat classification categories, as set forth in OAR-635-415-0025, in order to comply with OAR-345-022-0060, requiring identification of habitat categories and required mitigation. The applicant has failed to comply with these requirements!

The Grande Ronde river watershed contains a well-documented population of Bull Trout. By statute, wherever a portion of a watershed contains a Threatened or Endangered species, the entire watershed is under federal protection. The Grande Ronde river watershed encompasses the entirety of Union county, and the majority of Wallowa county. As evaluated in the DPO, ASC Exhibit P, suitable habitat used by state-listed Threatened and Endangered species is designated pursuant to ODFW's Habitat Mitigation Policy, and EFSC's Fish and Wildlife Habitat standards, as Category-1 Habitat, where any impact, direct or indirect is prohibited. There is NO mitigation for Category-1 Habitat!

The DPO, p. 304, line 32, through p. 307, line 21, acknowledges that there will be impact, but is unable to quantify it. Since any impact is prohibited, the magnitude of impact becomes irrelevant.

The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080, as noted above.

In view of the fact that recovery of the Bull Trout population sufficient to remove its Threatened status is reliably estimated to be a matter of decades, issuance of a Site Certificate should be denied, with prejudice!

Sincerely,  
John B. Milbert  
1812 Jefferson Ave  
La Grande, OR 97850  
[jmfisherman9@gmail.com](mailto:jmfisherman9@gmail.com)  
541-963-6964

**ESTERSON Sarah \* ODOE**

---

**From:** David Mildrexler <d.mildrexler@gmail.com>  
**Sent:** Thursday, August 22, 2019 4:59 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** EOLL comments on B2H Transmission Line Proposal  
**Attachments:** EOLL\_B2H\_comments\_August\_2019.docx

To whom it concern,

Attached please find the comments of Eastern Oregon Legacy Lands on the B2H Transmission Line. We appreciate your attention to our comments.

warm regards,

David Mildrexler

David Mildrexler  
Systems Ecologist, PhD  
Eastern Oregon Legacy Lands  
[davidm@eorlegacylands.org](mailto:davidm@eorlegacylands.org)

August 8, 2019  
C/O Kellen Tardaewether  
Via [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

Re: Comments on the B2H Power Line

I am an ecosystem scientist with expertise in ecology, forestry and a number of related fields. I work for Eastern Oregon Legacy Lands, sponsor of Wallowology Natural History Discovery Center located in downtown Joseph, Oregon. Eastern Oregon Legacy Lands (EOLL) strives to create a land conservation legacy in part through establishment of a system of reserves and corridors across the Blue Mountains landscape.

EOLL is strongly opposed to the Boardman to Hemingway Transmission Line. We are opposed to the Mill Creek and Morgan Lakes routes over Glass Mountain. This proposal and the impacts on the Blue Mountains are in direct opposition to the goals of our organization and our membership.

The Blue Mountains represent one of the most biologically important wildlife mega-corridors in the Pacific Northwest, directly adjoining the Northern Rockies to the East, and the Cascades to the West. The data in Figure 1 illustrates the average direction mammals, birds and amphibians need to move to track hospitable climates as they shift across the landscape. The East-West orientation of this corridor is unique, forming a linkage between systems that are otherwise characterized by North-South migration corridors. The integrity of this corridor is critical to the survival of the species that inhabit Eastern Oregon, the Blue Mountains, and for resilience of adjacent regions. Climate change increases the need for species to move and adapt to change, and the B2H Transmission line puts a massive barrier to that need across the landscape. The B2H Transmission line will drastically degrade the ability of natural ecosystems to function in the Blue Mountains. This proposal threatens the integrity and well-being of the ecosystems and communities of Eastern Oregon.

# Blue Mountains: Mega-Wildlife Corridor

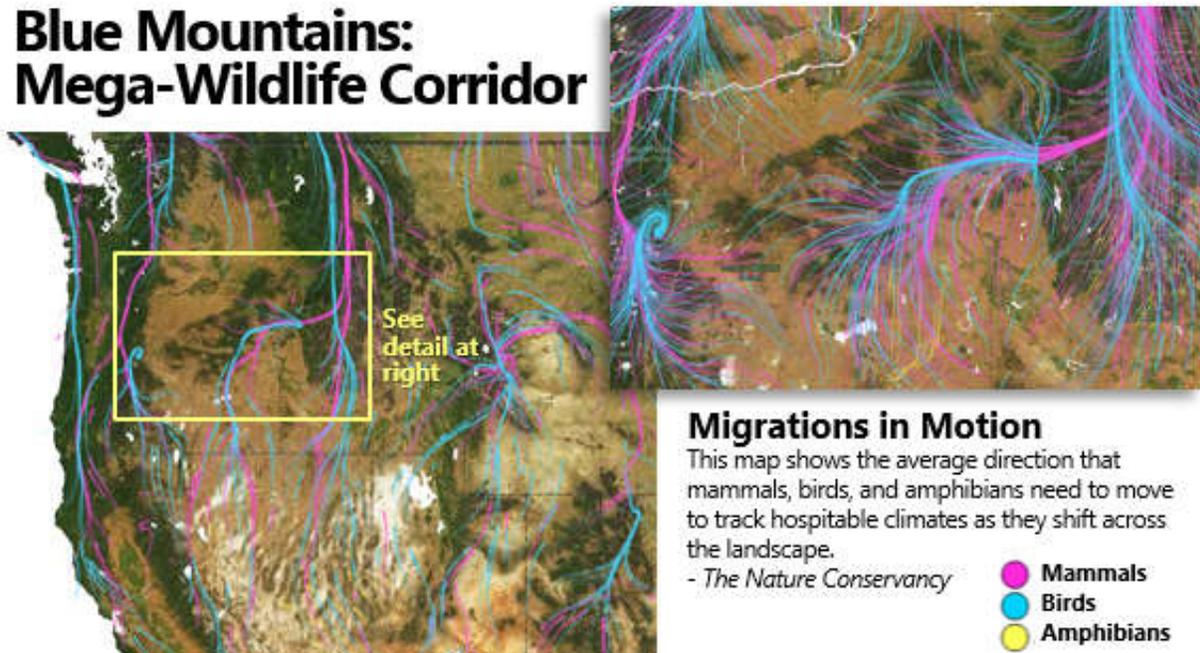


Figure 1. The average direction mammals, birds and amphibians need to move to track hospitable climates as they shift across the landscape of the interior PNW region of Oregon, Washington and Idaho. <http://maps.tnc.org/migrations-in-motion/#7/44.739/-119.680>

In conclusion EOLL is strongly opposed to the B2H Transmission line due to its negative impacts on habitat connectivity, working lands, scenic resources, and the economic vitality of our region. The B2H Transmission Line would slice a major barrier to wildlife movement directly through the heart of this landscape. Such actions run counter to biodiversity conservation, water protection, climate change adaptation and ultimately to the health of the communities of the Blue Mountains.

Respectfully submitted,

David Mildrexler

702 East Greenwood St  
Enterprise OR, 978928

August 14, 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](mailto:B2H.DPOComments@Oregon.gov)

Dear Chair Beyeler and Members of the Council:

Thank you for allowing me to address this issue. I am currently a student at EOU. I have been to Morgan Lake several times. It provides a much-needed break from the stress that comes from being a full-time student. When I heard the projected statistics that the existing trees would hide the transmission line, I was completely shocked. This transmission line would permanently disrupt the serene viewpoints that can be seen.

Morgan Lake Park, analyzed as part of the Morgan Lake Alternative - (Attachment T-3, Table T-2, p. T-3-2; Table T-3-1, p. T-13) and Summary of Impacts, pp. T-27-28, 43, (T-4-51-56), inaccurately describes features of the park itself and severely underestimates the permanent impact of development on this unique city park.  
See OAR 345-021-0010 (1) (T) (A) (B) (D) & OAR 345-022-0100

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

Page 62 (T-57) refers to “extensive work in the siting study of the Morgan Lake Alternative.” That is doubtful because it is completely inaccurate:

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, which is developed with primitive campsites and fishing docks.

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300’ of Morgan Lake; it covers 27 acres.

Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. In their application, Idaho Power omits any references to Twin Lake.

Page 156, (T-4-6) purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe “extensive work on this siting study” ever occurred.

2) b. A specific example of unsupported conclusion:

Page 145 (T-4-46) Baseline condition: “... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users...”

Page 146 (T-4-47) "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape."

Page 49 (T-44) "Vegetation will block views of the towers from most locations in the park." In reality, one tower would dominate the entrance to the park, all 130' in plain view. Within the Park, the trees bordering the lake are no more than 80' high. 130' transmission towers will rise more than 50' above those trees, dominating the current landscape.

Idaho Power does not provide a graphic representation of Morgan Lake Park, with the accurate height of existing trees, and elevation of towers above the trees. It simply concludes that the inescapable sight of 500 kV transmission lines and towers around a natural lake setting will have "no significant impact" on Morgan Lake Park.

This is the park whose baseline "should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users" [because 50 years ago, no one ever imagined anything larger than a human being, might ever intrude]..."

I urge the Commission to deny this application for a site certificate until each comment submitted and sent to the Commission by August 22 has been thoroughly analyzed, and Idaho Power has provided credible evidence to support each of its conclusions of "no significant impact."

Annika Miller  
Signature

Name: Annika Miller

Mailing Address: 445 SE 9<sup>th</sup> Drive, Hermiston, OR 97838

August 20, 2019

Energy Facilities Siting Council  
C/O Kellen Tardaewether, Senior Siting Analyst  
Oregon Dept of Energy  
550 Capitol St, NE, 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 & Member of the Council

Application must be completed for any consideration of permit. Applicant has failed to include all required sources of noise in 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,

  
Dawn Fairburn Miller  
601 Spring Ave  
La Grande, OR 97850

August 20, 2019

Energy Facilities Siting Council  
C/) Kellen Tardaewether, Senior Siting Analyst  
Oregon Dept of Energy  
550 Capitol St, NE  
Salem, OR 97301

[B2H.DPOComments@Oregon.gov](mailto: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 currently proposed. My concerns are for the safety of my family & 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 & 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 & Deacon (1971). The study identified several landslides in the areas west & south of La Grande. The majority of the landslide features mapped by Schlicker & 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 & others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, including one landslide area in Schlicker & 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 & Schlicker & 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 geologists' warnings. In the area down slope from the proposed B2H line lies the Grande Ronde Hospital & multiple Clinics, employing hundreds of people, & is also the critical access hospital for this entire region. La Grande High School & Central Elementary School are also positioned down slope from the proposed towers, as well as are at least 100 residences. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker & 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 8<sup>th</sup> most wildfire prone state in the US, 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 & Richard D. Stratton (available at [http://pyrologix.com/ftp/Public/Reports/RiskToCommunities\\_OR-WA\\_BriefingPaper.pdf](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, 8/10/2005.

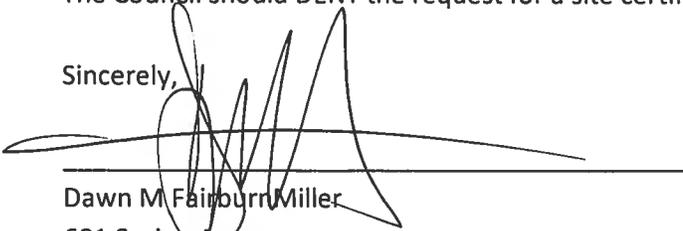
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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



---

Dawn M Fairbairn Miller  
601 Spring Ave  
La Grande, OR 97850

August 20, 2019

Oregon Energy Facility Siting Council  
C/O Kellen Tardaewether, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol St, NE, Salem, OR 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman-to-Hemingway Transmission Project

Dear Chair Beyeler and Members of the Council:

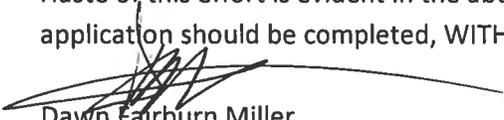
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It is distressing to think that this is only one of many errors in Idaho Power's ASC. If the IPC surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it's disquieting to imagine their difficulties in identifying 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 & ill-advised effort to avoid litigation threatened by individuals whose remote properties and summer cabins would have been impacted by the proposed transmission 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 current route proposed.

Haste of this effort is evident in the abundant errors, omissions & flagrant misinformation. This application should be completed, WITH ACCURACY, prior to evaluation.



Dawn Fairburn Miller  
601 Spring Ave  
La Grande, OR 97850

August 19, 2019

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

**THE APPLICANT SIGNIFICANTLY UNDERSTATES THE FINANCIAL IMPACTS TO THE STATE AND LOCAL ECONOMY AS A RESULT OF THE LOSS OF FOREST LANDS "PERMANENTLY"**

Exhibit K, Attachment K-2, Page 23, Section 7.0

Idaho Power values Oregon's forest lands at an absurdly low amount according to individuals owning forest land in both counties.

The applicant claims that removal of forestland by clearing of trees permanently will have little economic impact to Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. They value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the figures they claim apply or the basis for the difference in value per acre between Umatilla and Union Counties for forest economic value.

The applicant failed to address OAR 660-006-0025(5)(a) which does not apply only to forest zoned land currently in production. It addresses FOREST ZONED LAND. The developer is removing the income and opportunity for the landowners and counties to obtain the benefits available through timber production. For example, a large amount of land was burned and is recovering but will become productive timber land.

The applicant also limited their assessment of impacts to accepted forest practices to the current use of the land. The requirement under OAR660-006-0025(5)(a) is to assess whether or not the development will cause a significant change or significantly increase the costs of accepted forest practices on forest lands. This developer is stating that they are going to cause a permanent change to the land in their proposed right of way. Accepted forest practices are based upon the impacts in the future when the land is being utilized for growing trees or other uses consistent with the forest zoned lands. Forest uses are defined in Union County Land Use Plan as The (1)production of trees and the processing of forest products (2) open space, buffers from noise, and visual separation of conflicting uses; (3) watershed protection and wildlife and fisheries habitat; (4) soil protection from wind and water, (5) maintenance of clean air and water (6) outdoor recreational activities and related support services and wilderness values compatible with these uses, and (7) grazing land for livestock

The developer assumes incorrectly that the forest zoned lands not currently in production of trees will ever be used for that purpose.

The assessment of the impacts to accepted forest practices is seriously understated due to the understatement of forest lands, the lack of including the impacts to forest practices and the economic impacts of removing the land from forest uses.

1. The applicant ignored the definition of "forest lands" in determining the amount being impacted by the development. Forest Lands include, "lands composed of existing and potential forest lands which are suitable for commercial forest uses; (2) other forested lands needed for watershed protection, wildlife and fisheries habitat and recreation; (3)lands where extreme conditions of climate, soil and topography require the maintenance of vegetative cover irrespective of use; (4)other forested lands in urban and agricultural areas which provide urban buffers, wind breaks, wildlife, and fisheries habitat, livestock habitat, scenic corridors and recreation use; (5)means any woodland, brushland, timberland, grazing land or clearing that, during any time of the year, contains enough forest growth, slashing or vegetation to constitute, in the judgment of the state forester, a fire hazard, regardless of how the land is zoned or taxed. As a result of only counting forest lands currently in production, the forest impacts are significantly understated.
2. There is no explanation regarding how they came to the numbers they are using for forest sector jobs or explain the difference between the two counties.

Costs to the landowner of forest zoned land currently in production of timber:

1. There is a significant change when the landowner can no longer use his land for growing timber, but continues to have the expense of paying taxes on land that is not productive. The loss comes directly from the landowners profit from the harvest.
2. Landowners will receive less income with the same expenses.
3. For landowners who receive income from hunters, the land will become less desirable due to the visual impact of the line and the fact that elk will avoid the area for multiple reasons including human and vehicle traffic, corona visual impacts, etc.
4. Landowners use their land as collateral for borrowing funding to run their operations. The reduction in value will make it more difficult for owners to obtain necessary funding in order to stay in business.
5. Accessing timber on either side of the transmission line requires moving vehicles and equipment around the transmission line due to an inability to move log trucks and large equipment under the line.
6. Limits the direction for falling timber and can result in more dangerous tree falling with increased damage to the remaining timber as well as the one being harvested.
7. A transmission line results in the loss of timber along the line due to blow downs.
8. There is an increase in the potential for fire both from the line, but even more significantly, from human traffic along the transmission line.
9. Increased liability and insurance needed due to increased risk of injury to trespassers.

10. There is a loss of wildlife habitat without being mitigated due to a failure to require the developer to provide mitigation for the destruction of forest habitat along the right of way. Requiring mitigation for only the bases of the structures means only a minute amount of the loss will be compensated for. Only allowing the removal of nest sites when birds are not present does not address the fact that many birds such as bald and golden eagles use the same nesting sites year after year and forest landowners usually include wildlife habitat as a reason for maintaining the forest land.
11. Idaho Power states that the value of the forest land removed permanently from production would be further reduced due to the ability of the forest owners to use the transmission line corridor for growing crops or grazing. This statement is unequivocally false. 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.

Costs to forest zoned land currently being used for farm practices:

1. Increased invasive weeds.
2. Increased costs to apply herbicides, pesticides and fertilizer due to restricting the use of aircraft for application.
3. Increased safety hazard due to transmission line interference with emergency calling.
4. Increased cost of activities normally occurring through radio controlled equipment due to need to hire a person to perform the function.
5. Interference with irrigation equipment.
6. Loss of land use around the transmission structures due to turning radius of equipment and restrictions regarding height of equipment that can go under the transmission lines.
7. Soil compaction from equipment causes reduced crop yield for years according to landowners with existing transmission lines crossing their land.
8. Road damage due to ongoing use by developer and contractors performing maintenance on the transmission line.

Costs to the local economy:

1. The developer failed to include the harvest income that is received by the landowner and then spent primarily in the local area.
2. There is no consideration for the increased value of money which is circulated in the local community.

3. There is no accounting for the state and local taxes paid as well as harvest taxes which are paid and support the state and local area.
4. Replacing trees with a transmission line will negatively impact tourism dollars as it will reduce the numbers of wildlife viewers and hunters due to a reduction in elk, deer, birds, and other wildlife that draw them to the area. The Oregon Department of Fish and Wildlife and Travel Oregon reported that 2008 recreation expenditures in Oregon totaled \$2.5 billion as reported by Dean Runyan Associates. As the following comment notes, energy projects are cutting into that revenue.
5. Attached article "Are energy projects causing loss of tourism dollars on public lands?" cites the data from the Bureau of Land Management which recorded a 12% drop in the number of visitors to the Imperial Sand Dunes Recreation Area over the year after a high voltage power line was constructed. Data is available in the BLM's Centro Field Office under Highlights of the Desert District Advisory Council Meeting dated February 9, 2013.
6. The increased costs to harvest timber after a transmission line has been built is recognized by the courts who mandate that payment be made to landowners for this loss if their property is condemned to build the transmission line. The compensation must include at a minimum the value of the existing timber, the value of the timber that could be produced on the land in the future, and the increased costs of harvesting the timber adjoining the transmission line.
7. The developer plans to use local resources to fight fires caused by the transmission line or access created by the transmission line to human caused fires. There is no required mitigation for the increased risk of fire. The applicant's statements that they "may" restrict hours of operation, they "may" require water trailers, "may" require fire watches, "may" restrict road use during thaws means there is no mitigation being required to reduce the increased fire risk or the road damages that will occur.

Some facts related to the value of forest land:

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

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

In other words, this transmission line will remove forested land resulting 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, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife using the forest lands to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, it will decrease the value of land if it is sold, cause a long-term reduction in assessed value of the land, etc.

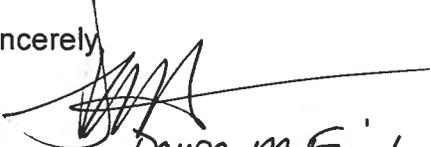
The Conclusions stated by the applicant in section 8.0 are absolutely false.

In addition, the applicant has failed to provide documentation to support their comments. The only reference the applicant sites 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.

Sincerely

  
Address: Dawn M Fairbairn Miller  
601 Spring Ave  
La Grande OR 97850

August 20, 2019

Oregon Energy Facility Siting Council  
C/O Kellen Tardaewether, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol St, NE, Salem, OR 97301

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La Grande, OR 97850

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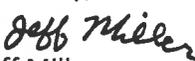
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I am very concerned about the Boardman to Hemingway Transmission Project as it is currently proposed. My concerns are for the safety of my family & all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability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

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability & 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 & Deacon (1971). The study identified several landslides in the areas west & south of La Grande. The majority of the landslide features mapped by Schlicker & 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 & others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, including one landslide area in Schlicker & 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 & Schlicker & 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 geologists' warnings. In the area down slope from the proposed B2H line lies the Grande Ronde Hospital & multiple Clinics, employing hundreds of people, & is also the critical access hospital for this entire region. La Grande High School & Central Elementary School are also positioned down slope from the proposed towers, as well as are at least 100 residences. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker & 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 8<sup>th</sup> most wildfire prone state in the US, 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 & Richard D. Stratton (available at [http://pyrologix.com/ftp/Public/Reports/RiskToCommunities\\_OR-WA\\_BriefingPaper.pdf](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, 8/10/2005.

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), all of which were 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 a frightening & 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,

  
\_\_\_\_\_  
Jeff Miller  
601 Spring Ave  
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) Jennifer Miller

Mailing Address (mandatory) 445 SE 9th Dr  
Hermiston OR 97838

Phone Number (optional) (541) 667-2468 Email Address (optional) rutnut@eoni.com  
already have

Today's Date: 6-26-19

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](mailto: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.)*

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1 be succinct and pointed in your comments.  
 2 Is there anybody on the phone that would like  
 3 to give comment tonight? Hello, is there anybody on the  
 4 phone that wants to comment tonight? Hearing none, I  
 5 will circle back around later, but we will just assume  
 6 for now that everybody that wants to give comment will  
 7 be doing so in person tonight.  
 8 As I said, at this point I have three cards,  
 9 and if I get more, please bring them up to me. I will  
 10 say, that if you need 15 minutes, feel free to use that,  
 11 otherwise, we'll keep going.  
 12 Please be respectful of the allotted time,  
 13 which is, in this case, tonight, as long as you need,  
 14 and of other speakers. If I or a Council member asks a  
 15 clarifying question, the time will be stopped for the  
 16 question and response and then restarted to provide you  
 17 the opportunity to complete your statement.  
 18 Any requests made to the Council will be  
 19 brought up at the conclusion of the public testimony  
 20 opportunity of the hearing.  
 21 Today's hearing, as well as all of the public  
 22 hearings on the Boardman to Hemingway draft proposed  
 23 order, are being documented by a certified court  
 24 reporter, and there will be transcripts of the testimony  
 25 made available after the completion of the public

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1 hearings. We are also recording the hearing today. The  
 2 presentations, written comments, and oral testimony are  
 3 part of the decision record of the proposed facility.  
 4 Pursuant to OAR 345-015-0220(5)(a), (b),  
 5 please note the following: "A person who intends to  
 6 raise any issue that may be the basis for a contested  
 7 case must raise the issue in person at the hearing or in  
 8 a written comment submitted to the Department before the  
 9 deadline July 23rd at 5 p.m.  
 10 "A person who intends to raise any issue that  
 11 may be the basis for a contested case must raise the  
 12 issue with sufficient specificity to afford the Council,  
 13 the Department, and the applicant an adequate  
 14 opportunity to respond, including a statement of facts  
 15 that support the person's position on the issue."  
 16 To raise an issue in a contested case  
 17 proceedings the issue must be: Within the Council's  
 18 jurisdiction, raised in writing or in person prior to  
 19 the close of the record of the hearing comment period,  
 20 again, July 23 at 5 p.m., raised with sufficient  
 21 specificity to afford Council, the Department, and  
 22 applicant an adequate opportunity to respond.  
 23 To raise an issue with sufficient specificity,  
 24 the person must present facts that support the person's  
 25 position on the issue.

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1 We will now begin the public testimony. It is  
 2 5:05 p.m. When I call you up to speak, please provide  
 3 your name and address for the record at the beginning of  
 4 your testimony.  
 5 And the first person we will have tonight is  
 6 Jennifer Miller.  
 7 MS. JENNIFER Miller: My name is Jennifer  
 8 Miller. I live in Hermiston, Oregon. My address is 445  
 9 Southeast 9th Drive.  
 10 I don't have a bunch of written things down,  
 11 just a few comments, I guess. Then maybe when I write  
 12 my letter, I can be more specific. I didn't know how  
 13 specific I needed to be this evening.  
 14 I'm a member of the Oregon and California  
 15 Trails Association. So, of course, the Oregon Trail is  
 16 definitely one of the issues that I have issues with.  
 17 The trail is finite in how much there is, and when it  
 18 gets ruined, it's never going to be able to be brought  
 19 back, no matter what kind of mitigation can happen.  
 20 Because "mitigate" just means you're trying to fix a  
 21 little something on the side in replacement of what has  
 22 been destroyed. And once it's been destroyed it cannot  
 23 be brought back.  
 24 So I appreciate that, especially on BLM lands  
 25 and some places that measures have been taken to try to

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1 preserve the trail and keep things away as much as  
 2 possible. But no matter what, the support roads that  
 3 are going to be built are going to cross sections of the  
 4 trail, and so it will be destroyed or permanently  
 5 changed.  
 6 Also, depending on where the actual  
 7 transmission line gets put is also going to affect the  
 8 trail. Not necessarily right on top the trail, but  
 9 visually the viewshed is going to definitely be changed  
 10 forever.  
 11 And just speaking as a person who lives in  
 12 eastern Oregon, I like being able to see a wide viewshed  
 13 instead of just being super narrow. If I didn't want to  
 14 see things, then I would go live in Portland and see  
 15 towers and things like that. That's not where I live.  
 16 I live here.  
 17 Some questions that came up about the noise.  
 18 When the decisions are made whether noise would affect a  
 19 place or not, was there a person who actually went to  
 20 each of those places, physically boots on the ground, to  
 21 see how that would affect -- I guess it's just a  
 22 question. I don't know how that process worked. Can  
 23 you answer that?  
 24 HEARING OFFICER WEBSTER: I can't. And I  
 25 don't think Council can or the staff can at this point

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1 because the purpose is to hear from the public tonight.  
 2 But it's a concern that you can raise and a question  
 3 that you can present to be considered later.  
 4 MS. JENNIFER MILLER: Okay. I was just  
 5 wondering.  
 6 Of course all of my ideas ran right out of my  
 7 head. I can't think of anything else right now.  
 8 HEARING OFFICER WEBSTER: You had the trail  
 9 concern, the noise concern. Was there another one?  
 10 MS. JENNIFER MILLER: And the weed suppression  
 11 and the fires that was mentioned, too. So I appreciated  
 12 the comments that Kellen made.  
 13 I know that wildfires are becoming  
 14 increasingly more serious all the time. And so that is  
 15 a big concern of mine, that in the county level, that if  
 16 there were to be a fire, the demands and the pressure  
 17 would be on the local fire departments. And I think  
 18 that is too large of an area, too much demand for the  
 19 local communities to be able to support the cost, the  
 20 manpower, and just the wherewithal to be able to deal  
 21 with the kind of fire that might be very far-reaching  
 22 because of the cause.  
 23 I've also spent some time under electric  
 24 lines, and I hear how much snapping of electricity is  
 25 being lost as the electricity is being transported. And

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1 to me that is a concern, that this proposed line is  
 2 going to transport all this energy and not all of it  
 3 will even be able to be delivered because of the loss  
 4 that happens over the miles that electricity is being  
 5 transported.  
 6 Another concern I have is there are no  
 7 off-ramps in Oregon. I don't want to pay for something  
 8 I don't get any benefit from. I think that's a fair  
 9 statement. I mean, our taxes, I'm assuming, would go up  
 10 to pay for this transmission line that will pay for  
 11 electricity to go to California or somewhere else,  
 12 wherever the highest bidder is. We get pretty cheap  
 13 electricity because we are right by the dam, and that  
 14 goes into our grid. So I have a concern about paying  
 15 higher bills because that electricity is going to  
 16 somebody else that I'm paying for.  
 17 I think that's it.  
 18 HEARING OFFICER WEBSTER: Thank you,  
 19 Ms. Miller.  
 20 Next is Irene Gilbert.  
 21 MS. IRENE GILBERT: Irene Gilbert, 2310 Adams  
 22 Avenue. I don't imagine you can figure out who one of  
 23 the groups are that I'm here for. I'm also here for  
 24 myself as a citizen and also as the legal research  
 25 analyst for Friends of the Grande Ronde Valley.

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1 I want to go over several different things.  
 2 One is about the forestland and the impacts that this  
 3 development is going to have on forestland. What I  
 4 found is that the assessment of what is forestland is  
 5 pretty questionable in terms of the amount of forestland  
 6 that they're saying the transmission line will affect.  
 7 And I know in Union County they used prevailing use of  
 8 the land, which is inconsistent with litigation that  
 9 said that it had to do with the soil classification.  
 10 And so first off, the amount of acres is I  
 11 think fairly low. Also, the way they value forestland  
 12 is really questionable. In Union County, we're going to  
 13 lose they say 530 acres. They value that the economic  
 14 value is \$97,000 for 50 years.  
 15 In Umatilla County, they're going to lose  
 16 245 acres, according to the developer, and they value  
 17 that at \$120,000. So I guess the people in Umatilla  
 18 County have better trees or something, I don't know.  
 19 I've been really curious about the difference in how  
 20 they value those.  
 21 One thing also with the forestland that are  
 22 impacted, they only include the ones that are within the  
 23 site boundary, and there is a lot of activity that's  
 24 going to occur outside of the site boundary, and they're  
 25 not including those impacts in their statement of the

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1 impacts to forestland.  
 2 One of the things that's very concerning to me  
 3 is the way Idaho Power did their application. There was  
 4 actually a contested case about what was included in the  
 5 site boundary, and the rules of the statute are pretty  
 6 clear. It says that it's going to be the development  
 7 and all the related or supporting facilities like roads  
 8 and transmission lines and that sort of thing.  
 9 Well, one of the developers didn't include a  
 10 transmission line, and so there was a contested case.  
 11 And I'm sure that the people on the Energy Facility  
 12 Siting Council recall that. The decision of the Council  
 13 was that if the developer did not include one of these  
 14 related and supporting facilities, it wasn't considered  
 15 part of the site. So it was left up to the developer to  
 16 make that decision.  
 17 Now, this developer, when they filed their  
 18 application, they included as the site basically the  
 19 right-of-way. They have some little isolated circles  
 20 around some multi-use areas, but they did not include a  
 21 lot of the access roads. And so what that has meant is  
 22 that they didn't do surveys of those areas, they didn't  
 23 do wildlife impacts, they didn't do any of the things  
 24 they have to do for the site.  
 25 Well, now we are at this point in the

August 14, 2019

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

Via E-MAIL: [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

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

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line. It must be mentioned that this Historic Trail is what connected this amazing United States together and should be protected in every way before it disappears completely.

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

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

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

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

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

- a. It is a BLM ACEC area managed for public tourism
  - b. It is the single most visited tourist facility in Baker County
  - c. The quality of the facility is outstanding
  - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

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

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

Thank you,



Jennifer Miller  
445 SE 9<sup>th</sup> Dr. Hermiston OR 97838

Oregon Energy Facility 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 (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

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

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

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

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

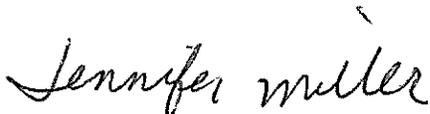
limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's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

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

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

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

Sincerely,



Name Jennifer Miller  
Address 445 SE 9<sup>th</sup> Dr. Hermiston OR 97838

August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

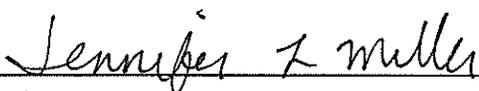
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming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

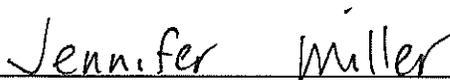
In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

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

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

  
Signature

  
Printed Name

Mailing Address: 445 SE 9<sup>th</sup> Dr. Hermiston OR 97838

**ESTERSON Sarah \* ODOE**

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**From:** rutnut@eoni.com  
**Sent:** Wednesday, August 21, 2019 4:31 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** B2H comments  
**Attachments:** B2H letter.docx

Thank you for consideration in reading this letter. Sincerely, Jennifer Miller

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
LC 68

In the Matter of  
IDAHO POWER COMPANY  
2017 Integrated Resource Plan

My name is Jennifer Miller and I am a resident of Hermiston, Oregon. I am writing concerning the proposed Boardman to Hemingway transmission line.

I strongly oppose the building of this transmission line for several reasons. As a taxpayer, I will be directly affected by the building of this line. My tax dollars will be used to pay for something that will not bring any direct usable power FOR Oregonians. In addition, the rates that I will be charged to maintain this unnecessary line will cost me for many years to come.

I also love the open spaces in eastern Oregon. Building another transmission line that has not been proven to be necessary will be a blight on the landscape. I have been under several high voltage transmission lines and the loss of electricity in transit is hugely wasteful.

Lastly, I am a member of the Oregon and California Trails Association. The impact to the Trail is severe in many places, especially in Eastern Oregon. Many tourism dollars are spent each year as people learn about, and travel along the Trail. This Trail is what bound our country together in the first place. It is not a replaceable resource. Once it's gone, it can never come back. It is an essential part of our heritage.

I do not believe that Idaho Power is in an appropriate place to ask for pre-construction activities (action item #6) for the B2H. There needs to be clear proof that this line is needed, that what is being proposed is actually prudent for our beautiful state of Oregon. Surely, with the great advancement of technology, a better way can be found before the year 2026, when the projected line might be in service.

Sincerely,

Jennifer Miller

445 SE 9<sup>th</sup> Dr.

Hermiston OR 97838

## TARDAEWETHER Kellen \* ODOE

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**From:** Mary Miller <marymillerinbakercity@gmail.com>  
**Sent:** Monday, July 22, 2019 2:21 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** B2H  
**Attachments:** B2H DPO Comments.odt

Enclosed file contains my B2H letter. Thank you for your time and consideration.

Sincerely

Mary E. Miller

3545 Carter St., Baker City, OR 97814

[marymillerinbakercity@gmail.com](mailto:marymillerinbakercity@gmail.com)

July 22, 2019

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

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

Dear Chair Beyeler and Members of the Council:

I am a citizen and taxpayer in Baker City, Oregon. I have some strong objections to the B2H transmission line here in Baker County. Though my concerns are many, I will focus here on adverse effects on tourism in Baker County, and visual impact to the Oregon Trail Interpretive Center.

### **1. Effects of B2H Transmission Line on Tourism in Baker County**

Total Direct travel Spending in Oregon reached 12.3 billion dollars in 2018 (Oregon Tourism Commission, March 2019, [traveloregon.com](http://traveloregon.com)). This was the ninth consecutive year that travel spending increased. Total Direct Travel Spending for eastern Oregon was \$391 million for the same year. In a study published by [traveloregon](http://traveloregon.com) in 2017, 43% of overnight travel to Baker County was to visit historic sites.

The Draft Proposed Order fails to take into account the effects on the tourism economy. Both the Scenic Resources section of OAR 345-022-0080 pp. 341 and the Recreation Resources section of OAR 345-022-0100 pp. 449 fail to mention effects on tourism. In light of this utter failure to account for effects on the tourism economy, I recommend that the council **deny this certificate application.**

### **2. Effects of B2H Transmission Line on the viewscape at the Oregon Trail Interpretive Center**

In OAR 345-022-0080 Visual Impacts, Exhibit R, Section 2.1, pp. R-1, it states that "...to issue a site certificate, the Council must find that that the design, construction, and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans, tribal land management plans and federal land management plans for any lands located within the analysis area described in the project order." However, on pp. 65 of OAR 345-022-0080 Visual Impacts, Exhibit R, under the heading "mitigation considered," it states very clearly that "In evaluating various alternatives for Project siting, IPC concluded that potentially significant visual impacts from facility structure in the vicinity of NHOTIC could result." Mitigation includes the use of H frame structure with a natina finish. **It is merely Idaho Power's opinion that this is adequate mitigation.** Citizens and government of Baker County have repeatedly insisted that the effects on viewscape are significant; the view is effected not just for a few seconds while driving east on highway 86, but for an eternity for those who live in the valley. This is not opinion-it is fact. Baker County officials and residents have also insisted that IPC consider burying the lines in the Baker Valley. The benefits and cost of this was supposedly discussed in Exhibit L of the Application for Site Certificate, but no reference could be found in this section of the OAR. Considering that the visual effects are significant in the area around the NHOTIC in Baker County, and that mitigation is inadequate, and that buried lines were not fully analyzed, I recommend that the council **deny this certificate application.**

**Conclusion:** That Idaho Power would fail to consider the economic impacts of tourism in Baker

County is an unacceptable omission. In addition, the viewscape around the NHOTIC in Baker Valley is one of our most prized resources. There is no mitigation that can fix a ruined landscape. **For the reasons stated above, I would like to see the Energy Facilities Siting Council REJECT this proposal and application.**

Sincerely,

Mary E. Miller  
3545 Carter St.  
Baker City, OR 97814  
marymillerinbakercity@gmail.com

## **TARDAEWETHER Kellen \* ODOE**

---

**From:** MARY MILLER <miller89123@cox.net>  
**Sent:** Monday, August 12, 2019 11:09 AM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Boardman to Hemingway Transmission line

Attention: Kellen Tardaewether, Senior Siting Analyst, Oregon Department of Energy

Hello,

I have an ownership interest of a parcel of land that would be crossed by the Boardman to Hemingway Transmission Line (Morrow County Detailed Map 11, Hartley Kathleen Lynn et al).

I join in the comments made by Brian Doherty to the EPSC at its June 27th meeting in Boardman.

The changes to our way of life that would result from the proposed line are unacceptable and unnecessary, and not in the best interests of the public.

Please ensure that the ongoing compensation system proposed by Mr. Doherty and others is implemented, and if for any reason the line is approved, please take every possible measure to mitigate its impact and protect the citizens of Oregon.

Thank you for reading this.

Mary Anne Miller

**ESTERSON Sarah \* ODOE**

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**From:** Sue Miller <subdo2000@yahoo.com>  
**Sent:** Tuesday, August 20, 2019 8:41 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** B2H comment: Deny site certificate

August 20, 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 email: [B2H.DPOComments@Oregon.gov](mailto: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: Endangered Fish in Ladd Creek and Tributaries, 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. This project has unacceptable long term impacts.

I request that my letter protesting issuance of an Oregon Site Certificate for the currently proposed Boardman-to-Hemingway Transmission Project (B2H Project) be entered into the permanent written record. I also request response to, and resolution of, the issues I raise herein.

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 attached Power Point "Ladd Creek Fish Passage Project - ODOT FTP").

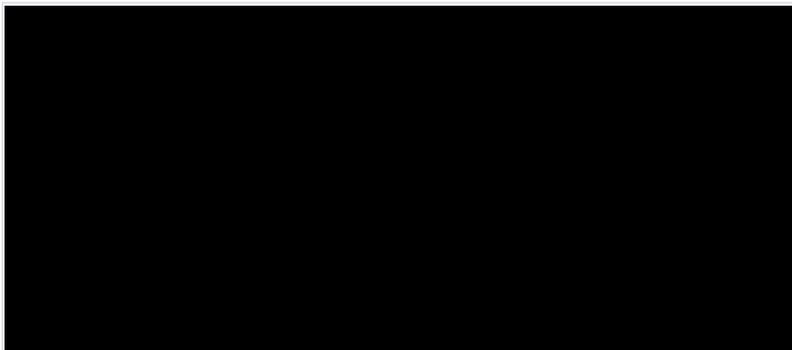
The Oregon Department of Fish and Wildlife's mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state 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 (pages 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 [ODOT Works to Improve I-84, Fish Passage in Ladd Canyon](#)). Construction projects have resulted in costs above 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



**ODOT Works to Improve I-84, Fish Passage in Ladd Canyon**

Crews have begun work on a \$29.3 million project in Eastern Oregon that is expected to improve safety on a highw...

(see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and attached ([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. 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).

Idaho Power has two proposed line routes across and through Ladd Canyon, a preferred and an alternative. Idaho power has also stated that because there are only resident fish in Ladd Creek, that "No new fish passage plan anticipated" (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*).

Because the alternative route through Ladd Canyon would necessitate a 3a/3b design change for a bridge crossing on Ladd Creek and there are threatened anadromous fish in Ladd Creek, an ODFW fish passage plan will need to be implemented (*OAR 17 412-0035*) based on (*OAR 635-412-0020*) for this route for Ladd Creek and its tributaries.

In conclusion, the B2H DPO contains improper evaluation of the potential long term negative impacts on fish habitat in the Ladd Creek drainage, including tributaries. The Endangered Species Act requires identification and evaluation of effects of the proposed action through ESA section 7(a)(2) consultation with NMFS (anadromous fish species). Federally protected anadromous species are currently present in Ladd Creek, and its tributaries.

Idaho Power's B2H DPO is not in compliance with State or Federal Protected Species laws. The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080. Therefore, issuance of a Site Certificate should be denied.

Sincerely,

Sue Miller

62240 Dial Lane

Summerville, OR 97876

subdo2000@yahoo.com

(541) 605-8286

**ESTERSON Sarah \* ODOE**

---

**From:** Sue Miller <subdo2000@yahoo.com>  
**Sent:** Tuesday, August 20, 2019 8:48 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Comment in protest of B2H project

August 20, 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](mailto: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 a concerned citizen writing in protest of the proposed Boardman to Hemingway Transmission Line Project. Specifically, I am protesting regarding the B2H Draft Proposed Order, the Final Environmental Impact Statement, and the project's plan regarding wild and threatened fish.

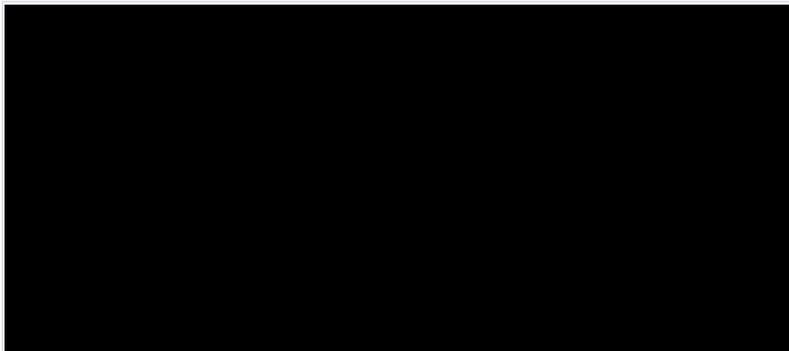
Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue Mountains, into the Ladd Marsh Wildlife area, connecting with Catherine Creek and the Grande Ronde, Snake, and Columbia Rivers.

Historically, there were anadromous fish (steelhead and salmon returning from the ocean) in Ladd Creek. ODFW has documented that steelhead and salmon used Ladd Creek for spawning. However, construction of Interstate 84 in the 1970's stopped the passage of these fish above the interstate due to a vertical culvert being installed (see Power Point "Ladd Creek Fish Passage Project - ODOT FTP").

The Oregon Department of Fish and Wildlife's Mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state Wildlife Policy (ORS 496.012) and Food Fish Management Policy (ORS 506.109) are the primary statutes that govern management of fish and wildlife resources.

The B2H Draft Proposed Order (page 9-10 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*), states that Ladd Creek and its tributaries contain only local fish (trout), but **that status has changed** due to major culvert work along and under the I-84 interstate in the last 4 years. As a result, the information contained in the B2H Draft Proposed Order is incorrect and out of compliance with Oregon and Federal statutes.

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see [Restoring fish habitat in Ladd Canyon](#)).



### Restoring fish habitat in Ladd Canyon

By Thanksgiving, fish are expected to gain access to more than 10 miles of habitat along Ladd Creek that has bee...

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 [ODOT Works to Improve I-84, Fish Passage in Ladd Canyon](#)). 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



## ODOT Works to Improve I-84, Fish Passage in Ladd Canyon

Crews have begun work on a \$29.3 million project in Eastern Oregon that is expected to improve safety on a highw...

(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 Creak, 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,

Sue Miller

62240 Dial Lane

Summerville, OR 97876

[subdo2000@yahoo.com](mailto:subdo2000@yahoo.com)

541.605.8286

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1 August 22nd, 5 p.m. Pacific Daylight Time, I think.  
 2 Unless it's Standard Time, but I believe it's Daylight  
 3 Time at this time of year.  
 4 One last opportunity for anybody to give  
 5 comment this evening. I don't know, do we want to -- we  
 6 will plan to stay around in case somebody comes in later  
 7 and wants to give comment. But we will go into recess  
 8 now until somebody comes in, if they do.  
 9 It is 6:24 p.m. We are in recess.  
 10 (Recess taken.)  
 11 HEARING OFFICER WEBSTER: It's 7:27. We are  
 12 reconvening for another member of the public to give  
 13 public comment.  
 14 If you would hand me your form there.  
 15 MR. ED MILTENBERGER: I haven't filled it out.  
 16 HEARING OFFICER WEBSTER: You can do it  
 17 verbally. If you would state your name and your  
 18 address, please.  
 19 MR. ED MILTENBERGER: Ed Miltenberger, 803  
 20 Southwest Court, Pendleton, Oregon. That's my mailing  
 21 address. The property is, we are located out in the  
 22 Gerdain [ph] District. My concern, is that where I  
 23 should start?  
 24 HEARING OFFICER WEBSTER: Yeah. What issues  
 25 did you want to raise about the B2H draft proposed

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1 order?  
 2 MR. ED MILTENBERGER: The issue I want to  
 3 bring up is just to state here that I'm concerned with  
 4 the fragile depth of the soil and the traffic across it  
 5 and the terrain steepness and the topographical outlay,  
 6 that it's going to be pretty hard on that piece of  
 7 property.  
 8 I know I avoid the "trail," as you might call  
 9 it, and I see they have listed it as a "road." It's  
 10 really not much of a road because the only thing they  
 11 use it for is servicing the springs up on top. And I  
 12 try to stay off of it as much as I can, so as light of  
 13 traffic as possible because it's so steep. There is  
 14 some parts of it that stay pretty wet and it tears it up  
 15 pretty bad.  
 16 Like I said, the soil is real fragile. The  
 17 grass that is on it is less than in 2 inches of soil,  
 18 and I know it takes more than 2 years for some of it to  
 19 come back in the tracks that I've laid.  
 20 So with that in mind, the runoff in the spring  
 21 is terrible up there because we do get a lot of snow,  
 22 and it stays on pretty good. But when it comes off, you  
 23 can tell by these ravines in the map, that, boy, there  
 24 are really torrents that come down out of there.  
 25 This road is a testimony to a great amount of

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1 erosion in a place where erosion really doesn't occur  
 2 because it is kind of on the knoll of a hill that  
 3 provides access to this road that is proposed into that  
 4 property.  
 5 HEARING OFFICER WEBSTER: Just to clarify,  
 6 it's a road that they are going to use as an access road  
 7 or is it going to be --  
 8 MR. EDWARD MILTENBERGER: Yeah, it is on the  
 9 plat, as an aerial plat of it. I see how it would  
 10 service probably three towers. So if there is any  
 11 activity in inspecting the towers in the future or just  
 12 setting them all up, it's going to be pretty hard on  
 13 this piece of property because it's so sparsely  
 14 vegetated. The grass out there is pretty fragile.  
 15 That's kind of what I'm looking out for is  
 16 that I don't get a runoff problem. It just winds up in  
 17 the middle of a ravine below it.  
 18 CHAIRMAN BEYELER: How large an acreage is it?  
 19 MR. ED MILTENBERGER: 380 acres.  
 20 CHAIRMAN BEYELER: Okay. So that's part of  
 21 the section.  
 22 HEARING OFFICER WEBSTER: Anything else you  
 23 want to bring up?  
 24 MR. ED MILTENBERGER: Not at this time, unless  
 25 there is -- I would be open to the idea of an improved

Page 65

1 road on the property, but not so much. It's like  
 2 unpredictable to say that any road up there as a  
 3 permanent access would do that property any good at all.  
 4 And if it winds up that way, I would want to be  
 5 compensated for the upkeep of the road and the  
 6 preparation to keep it from turning into a complete  
 7 runoff thing, or someone should be responsible for the  
 8 terrain.  
 9 HEARING OFFICER WEBSTER: Thank you.  
 10 MR. ED MILTENBERGER: That's about it.  
 11 HEARING OFFICER WEBSTER: It's 7:32 and we are  
 12 back in recess.  
 13 (Recess taken.)  
 14 HEARING OFFICER WEBSTER: We are reconvening  
 15 again. We have another member of the public who wants  
 16 the opportunity to comment. It is 7:50. We are going  
 17 to hear from Terry L. Clarke.  
 18 HEARING OFFICER WEBSTER: If you would state  
 19 your name and your address for the record.  
 20 MR. TERRY L. CLARKE: I'm Terry L. Clarke,  
 21 1325 Northwest Horn, Pendleton, Oregon.  
 22 I also represent TJJ Ranch, one of the  
 23 properties impacted by this proposed line.  
 24 So what I wanted to get on the record is that  
 25 we object to this, the construction of this line,

**ESTERSON Sarah \* ODOE**

---

**From:** richard minogue <richminogue@eoni.com>  
**Sent:** Thursday, August 22, 2019 3:30 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** B2H  
**Attachments:** March Letter #2 (Fish) copy.docx

August 18, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

Sent Via email: [B2H.DPOComments@Oregon.gov](mailto: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: Endangered Fish in Ladd Creek and Tributaries, Union County

Dear Chair Beyeler and Members of the Energy Facility Siting Council:

I am writing in protest of the proposed Boardman to Hemingway Transmission Line Project. I request that my letter protesting issuance of an Oregon Site Certificate for the currently proposed Boardman-to-Hemingway Transmission Project (B2H Project) be entered into the permanent written record. I also request response to, and resolution of, the issues I raise herein.

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 attached 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 (pages 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 projects have resulted in costs above 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 attached ([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. 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).

Idaho Power has two proposed line routes across and through Ladd Canyon, a preferred and an alternative. Idaho power has also stated that because there are only resident fish in Ladd Creek, that “No new fish passage plan anticipated” (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*).

Because the alternative route through Ladd Canyon would necessitate a 3a/3b design change for a bridge crossing on Ladd Creek and there are threatened anadromous fish in Ladd Creek, an ODFW fish passage plan will need to be implemented (*OAR 17 412-0035*) based on (*OAR 635-412-0020*) for this route for Ladd Creek and its tributaries.

In conclusion, the B2H DPO contains improper evaluation of the potential long term negative impacts on fish habitat in the Ladd Creek drainage, including tributaries. The Endangered Species Act requires identification and evaluation of effects of the proposed action through ESA section 7(a)(2) consultation with NMFS (anadromous fish species). Federally protected anadromous species are currently present in Ladd Creek, and its tributaries.

Idaho Power's B2H DPO is not in compliance with State or Federal Protected Species laws. The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080. Therefore, issuance of a Site Certificate should be denied.

Sincerely,

Richard Minogue

64338 Mt. Emily Rd

LaGrande, Or.

97850

richminogue@eoni.com

541-9637903



August 18, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

Sent Via E-Mail: [B2H.DPOComments@Oregon.gov](mailto: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.

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:

- 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:

- *ORS 509.580 through 509.910: Fish Passage; Fishways; Screening Devices; Hatcheries Near Dams*
- *OAR 635-41-0005 through 635-412-0040: Fish Passage*
- *Oregon Forest Practice Administrative Rules and Forest Practices Act, OAR Chapter 629 (ODF 2014)*
- *Forest Practices Technical Note Number 4, Fish Passage Guidelines for New and Replacement Structures (ODF 2002)*
- *Fish and Wildlife Mitigation Policy (OAR 635-415-0000), which states that :*
  - 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,

Richard Minogue

64338 Mt. Emily Rd.

LaGrande or

97850

seeminogue@gmail.com

541-9637903

**ESTERSON Sarah \* ODOE**

---

**From:** Judy Mittenthal <tjlranch@gmail.com>  
**Sent:** Wednesday, August 21, 2019 10:12 AM  
**To:** B2H DPOComments \* ODOE  
**Subject:** B2H Power Line Complaints  
**Attachments:** EFSC Comments Setbacks From Raptor Nest Sites.pdf

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

August 21, 2019

[B2H.DPOComments@Oregon.gov](mailto: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,

*Judy Mittenbraun, Manager*  
TJL Ranch LLC

Name: **TJL Ranch LLC**

Address:

1420 NW Gilman Blvd, Suite 2, #2655  
Issaquah, WA 98027

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

August 21, 2019

## SETBACKS FROM RAPTOR NEST SITES

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

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

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

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

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

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

*Judy Mittenenthal, Mgr*  
*TJL Ranch LLC*

Signature

Name: TJL Ranch LLC

Address: 1420 NW Gilman Blvd, Suite 2, #2655, Issaquah, WA 98027

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  
[Kellen.Tardaewether@oregon.gov](mailto:Kellen.Tardaewether@oregon.gov)

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

**Dear Chair Beyeler and Members of the Council;**

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

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

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

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

From Chapter 569 of Oregon law ([https://www.oregonlegislature.gov/bills\\_laws/ors/ors569.html](https://www.oregonlegislature.gov/bills_laws/ors/ors569.html)):

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

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

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

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

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

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

Sincerely,

*Judy Mittenenthal, Mgr*  
TJL Ranch LLC

**Name: TJL Ranch LLC**

**Address: 1420 NW Gilman Blvd, Suite 2, #2655, Issaquah, WA 98027**

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](mailto: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: *Bill Monda*  
Mailing Address: *905 LAKE AVE*

1617 Z Ave  
La Grande OR 97850

POSTED ON 5/2  
17 AUG 2019 PM 4 L



Energy facilities Strong Council  
c/o Kellen Tordaveyhen  
OR Dept of Energy  
550 Capital St NE  
Salem OR 97301

**RECEIVED**  
AUG 19 2019  
DEPARTMENT OF ENERGY

97301-374299



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](mailto:B2H.DPOComments@Oregon.gov)

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

Dear Chair Beyeler and Members of the Council:

Re: Soil Protection - **Drill site 94/4 on unstable and steep slopes**

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

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

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

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

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

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

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

Table C1: Summary of Proposed Borings; Map Sheet 35

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

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

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

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 **94/4** is within a mile of a heavily traveled I84 transportation/utility corridor.

**Conclusion and Requested Relief:**

**Drill site 94/4, and its vicinity**, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002, should be removed for consideration as a site for a transmission “facility”. Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

  
Name: Jennifer Moore  
Address: 1610 E Are la grande,

## References

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

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

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

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

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

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; *Soil Protection* Effective date: 10/18/2017.

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

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

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

August 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](mailto: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: *Megan Moore*  
Mailing Address: *2304 Cove Ave.  
La Grande, OR 97850*

## ESTERSON Sarah \* ODOE

---

**From:** Kathryn Morello <kitmorello@me.com>  
**Sent:** Wednesday, August 21, 2019 4:56 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** [Fortimail Spam Detected] B2H Public Comments

August 18, 2019

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

[B2H.DPOCOMMENTS@Oregon.gov](mailto:B2H.DPOCOMMENTS@Oregon.gov)  
Idaho Power Application for a Site Certificate for the  
Boardman to Hemingway Transmission Project 09/28/2018;  
Draft Proposed Order 05/23/2019.

Dear Chair Beyeler and Members of of the Council,

I have been going up to Morgan Lake for fifty plus years. There I find peace.  
The use of blasting and heavy equipment for construction of the power line towers could very well impact more than the peace the lake offers. The earthen dam that holds Morgan Lake in place is of utmost concern!

Division 25 SITE CERTIFICATE CONDITIONS 469.503 line 12.

The seismic events resulting from blasting and use of heavy equipment to install the towers are of major concern. How will Idaho Power mitigate the breach of the earthen dam, due to nearby blasting? The torrent of water and debris will find its way to Deal Canyon (West side of La Grande, Oregon) and wash out the homes in its path. The loss of homes and lives should be considered before going forward with this project! The blasting and movement of heavy equipment to build the roads needed and the blasting to be used in the construction of the tower base could be enough to trigger a flood. Idaho Power Transmission Line "(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. For coastal sites, this also includes tsunami hazards and seismically-induced coastal subsidence."

Thank you for acknowledging my concern of this troubling side effect of blasting and construction.

Considering the points above, Idaho Power cannot comply with critical state standards. Therefore **EFSC Must Deny the Site Certificate.**

Respectfully,



Kathryn Morello  
P.O. Box 147  
La Grande, OR. 97850

[ondyrela@eoni.com](mailto:ondyrela@eoni.com)

541-786-7224

August 18, 2019

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

RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

B2H.DPOCOMMENTS@Oregon.gov

Idaho Power Application for a Site Certificate for the  
Boardman to Hemingway Transmission Project 09/28/2018;  
Draft Proposed Order 05/23/2019.

Dear Chair Beyeler and Members of of the Council,

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Therefore **EFSC Must Deny the Site Certificate.**

Respectfully,



Kathryn Morello  
P.O. Box 147  
La Grande, OR. 97850

[cndyrela@eoni.com](mailto:cndyrela@eoni.com)

541-786-7224



Kelly Skovlin  
1404 Walnut St  
La Grande, OR 97850

RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

Energy facilities Siting Council  
% Keller Tardavethes, Sr. Analyst  
Oregon Dept of Energy  
550 Capitol St NE  
Salem, OR 97301

August 14, 2019

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

Via E-MAIL: [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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

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

- b. It is the single most visited tourist facility in Baker County
  - c. The quality of the facility is outstanding
  - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

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

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

Thank you,



Signature

Printed Name:

DEE MORRIS

Mailing Address:

P.O. BOX 449 UNION, Ore 97883

Email:

DeeandVickie@yahoo.com

LIFE LONG RESIDENT!



# 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) Carl + Julie Morton

Mailing Address (mandatory) 1248 Klamath Ave. Nussau, OR  
2185 Rock Springs Cyn. Rd. Nussau, OR.

Phone Number (optional) (208) 740-8249 Email Address (optional) \_\_\_\_\_

Today's Date: 6/18/19

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

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](mailto: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.)

We are not in favor of the power line going  
through ~~the~~ or above private property. We have  
a small farm with animals and feel it will not  
help with their well being as well as our peak  
Irrigation systems will be damaged as well

Page 66

1 interaction with him. And one of the engineers out of  
 2 our department went out there yesterday and met with  
 3 him, just dropped everything. He had gone and went out  
 4 there, took a look at it. At this point, I don't know  
 5 that there's anything we can do that would change  
 6 things. We're going to have to look at things a little  
 7 bit more.

8 We have continued to work with a lot of  
 9 different landowners on various micro-siting issues here  
 10 or there in trying to resolve issues ahead of time where  
 11 we can. So that's kind of where we're at with this  
 12 right now.

13 Mr. Proesch, as he indicated, just fairly  
 14 recently bought that parcel of property. We had over  
 15 the course of the last year, we had hired a title  
 16 company to go out and do title searches. We got that  
 17 information back certainly no more than 6 months ago.  
 18 And in fact, when the title company did the title  
 19 search, Mr. Proesch had not yet purchased that land; it  
 20 was a previous landowner's name who came back on the  
 21 results of the title search. So that's basically where  
 22 that's at.

23 While I have the opportunity in front of the  
 24 Council, I also wanted to point out and thank Roger  
 25 Findley and Gary Pearson for their comments earlier.

Page 67

1 When this whole project started, I was involved with it  
 2 from the get-go back in 2006 when it was first  
 3 identified. In fact, it came out in an IRP in the  
 4 summer of 2006. We do a road show to talk about the  
 5 plan with the public. And literally that fall of 2006,  
 6 I was over here in this room next door explaining the  
 7 whole plan to everybody. I met Roger and his wife Jean  
 8 and Gary, along with probably about 300 other people  
 9 that were here that night, which has to be the largest  
 10 crowd we've ever had for one of our IRP meetings.

11 So anyway, I wanted to thank those folks for  
 12 their comments. They expressed some concerns still with  
 13 some routing issues, but in general I think they were  
 14 very complimentary to Idaho Power on the efforts we've  
 15 made to reach out to the public and everybody that we  
 16 realize is going to be impacted by this line.

17 HEARING OFFICER WEBSTER: Any further  
 18 questions from Council for Mr. Stokes? Thank you.

19 Has anybody joined us that would like to give  
 20 public comment this evening?

21 As I indicated, we will be hanging around here  
 22 until 8:00, but we'll go off the record, and we will  
 23 reconvene if we need to. But at this point I want to  
 24 thank you all for coming and participating.

25 MR. ARNOLD TROPF: Could I make one more

Page 68

1 statement that I'm concerned with over there in Adrian,  
 2 Oregon.

3 HEARING OFFICER WEBSTER: So come back up.  
 4 MR. ARNOLD TROPF: I'm a recipient of a heart  
 5 pacemaker. I've got a monitor that's supposed to work  
 6 with cell phone connections, and I, myself, and several  
 7 other people in Adrian --

8 HEARING OFFICER WEBSTER: Hang on just one  
 9 sec. I just want to reintroduce you. You're Mr. Tropf;  
 10 right?

11 MR. ARNOLD TROPF: Arnold Tropf.  
 12 And I'm very concerned about my situation as  
 13 far as communications. What would this, what kind of an  
 14 adverse effect would this have on our communications  
 15 being's we don't have much now with this transmission  
 16 line going through? Because it used to be that I used  
 17 to use CenturyLink through their phone network but they  
 18 discontinued it. So I don't have 24/7, which I need to  
 19 have. But I can't get transmission out of there now.  
 20 So I don't know what would happen if it did, if I did  
 21 get it, would I be able to use it with this transmission  
 22 line, with static?

23 HEARING OFFICER WEBSTER: At this point we are  
 24 here just to get public comment and not answer those  
 25 questions.

Page 69

1 MR. ARNOLD TROPF: That's just another  
 2 concern.

3 HEARING OFFICER WEBSTER: Thank you.

4 MR. CARL MORTON: I'm Carl Morton.

5 HEARING OFFICER WEBSTER: If you would just  
 6 state and spell your name and address for the record.

7 MR. CARL MORTON: My name is Carl Morton,  
 8 M-o-r-t-o-n. We have property at 2185 Rock Springs  
 9 Canyon Road.

10 Our concern is that we have livestock in the  
 11 area, and we do have other properties next to the power  
 12 line that goes out toward Burns. When we're out there  
 13 it's very concerning because our horses can feel the  
 14 electricity, and the cows don't hang around it. We do  
 15 have irrigation systems that are aluminum, and when the  
 16 lightning storms come in we don't even change the water  
 17 just because of the issues of electricity.

18 We do have a very scenic area out there. As  
 19 Mr. Bowman stated, the eagles, we have deer around, we  
 20 have a lot of wildlife out there. And where your guys'  
 21 power line is going right next to our property is  
 22 probably within 50 feet. I'm pretty sure you wouldn't  
 23 like that power line next to your house. I don't want  
 24 to get up in the morning and see that thing or hear it.

25 We have grandkids, they're going to be around.

1 You know, we're very concerned. It's not a big issue to  
2 take that thing and go out on public ground, which is  
3 within 2 or 3 miles. There's another access route.

4 The canal system that's right there, the  
5 irrigation systems that Mr. Chamberlin and Mr. Horton  
6 were speaking about, they are on fragile ground. It's  
7 over 80 years old. And you guys start traveling and  
8 pounding the ground there, it's fragile rock, it's going  
9 to tear that system up, which is the lifeblood of this  
10 valley.

11 So what you guys need to do is stop and visit  
12 and really go out and get hands-on where this is going.  
13 Also, I don't think you've actually done any studies on  
14 archeology sites. I've been at one of these meetings  
15 and spoke to someone, I'm pretty sure they don't really  
16 know where they're at. And there is areas there that  
17 have Indian artifacts there.

18 So I don't think that everything is being done  
19 by looking at where you're going with this. And we need  
20 to just stop and take a minute and get it right.  
21 Because we don't need it in our backyards. We don't  
22 need it in our front yard or right out our window. So  
23 just please be considerate of where you're going and  
24 what you're doing with it.

25 And not only that, but you're taking value out

1 of our property. We purchased these grounds to keep  
2 them and help supply the food chain of the United States  
3 and our local government and the county. Even though  
4 we're just a small drop in the bucket, we're still here.  
5 So please don't take the value out of our ground.

6 Thank you.

7 HEARING OFFICER WEBSTER: Thank you.

8 Is there anybody on the phone at this point?

9 IT PERSON: No.

10 HEARING OFFICER WEBSTER: And what we'll do  
11 now is we will recess. I have 6:33, so we will be here  
12 for another hour and a half or so, and we'll reconvene  
13 if somebody wants to give comment.

14 Thank you.

15 Feel free to mill about and enjoy the snacks  
16 in the meantime.

17 (Hearing recessed at 6:33 p.m.)  
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**REPORTER'S CERTIFICATE**

I, BEVERLY A. BENJAMIN, CSR No. 710, Certified  
Shorthand Reporter, certify:

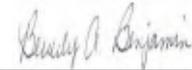
That the foregoing proceedings were taken before  
me at the time and place therein set forth;

That the testimony and all objections made were  
recorded stenographically by me and transcribed by me or  
under my direction;

That the foregoing is a true and correct record  
of all testimony given, to the best of my ability;

I further certify that I am not a relative or  
employee of any attorney or party, nor am I financially  
interested in the action.

IN WITNESS WHEREOF, I set my hand and seal this  
25th day of June 2019.



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

August 18, 2019

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

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

Dear Chair Beyeler and Members of the Council:

We are writing this letter in regards to the B2H Transmission Line Project that crosses EFU exclusive farm use ground, in the area of the lower Owyhee River from the Idaho Power Malheur County Map 125. We are land owners of property 21S45E01700. We have lived and worked in this area for over forty years and continued to do so as we raised our family on our cow/calf operation.

We are challenged with the proposed location for the Double Mountain Alternative route shown on the Idaho Power Parcels, Malheur County Map 125. ORS 215.213 states that other uses are permitted in the EFU land including "Utility facilities" (power lines), but ORS 215.275 defines the criteria for power lines to go in EFU land:

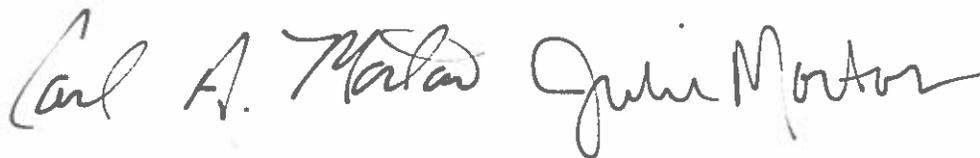
- A. Technical and engineering feasibility
- B. The proposed facility is dependent on location
- C. Lack of available urban and non-resource lands.
- D. Availability of existing rights of way
- E. Public health and safety
- F. Other requirements of state or federal agencies

The 2002 Resource Management Plan of the Bureau of Land Management-Vale District page 109 states that the "designation of right-of-way corridors and encourages use of rights-of-way in-common to minimize environmental impacts and the proliferation of separate rights-of-way. BLM policy, as described in BLM Manual 2801.13B1, is to encourage **prospective applicants to locate their proposals within corridors.**" Page 110 of the 2002 Resource Management Plan states, "The OWFEIS (see Map 7 of the OWFEIS) recognized the existing constructed 500-kV PP&L power line route as a **primary recognized existing route for location of future power line interties.**" We believe that Idaho Power should take this proposed route back to the Bureau of Land Management and revise the route closer to the primary recognized existing route, PP&L power line. The 2002 RMP of the BLM intended to keep future power line routes, such as the one being proposed, within the existing power line corridor. This new proposal contradicts the original intentions of protecting EFU land. Agriculture land in Malheur County is detrimental to the success of our toil and the future of generations to come. We, along with our neighbors, have faced many hardships to improve our land and facilities to increase the value of the property and better the environment. By placing this powerline along the proposed route, we would be eliminating years of hard work and financial investments; this will result in decreased property value and quality of the environment, which would lead to a

loss of taxable revenue for Malheur County and the State of Oregon. This route would take money needed for public schools and the county's economical growth. This area is not only used for EFU, but is also the location for the Owyhee Irrigation System which supplies the water needed for agriculture throughout Malheur County and even into Idaho. Many people depend upon the water supply from the Owyhee Reservoir. Placing the power line on the proposed route would damage newly constructed irrigation systems that were put into place to maintain and improve the environment. Several other uses for this area include the recreational use such as hiking, hunting, and fishing, and the use for Military practice. This area is a common practice and training area for the local National Guard for homeland security. With the proposed 500 kV Transmission Line in this area, the National Guard would be forced to find a new and approved practice and training area. In a meeting that was held August 14, 2019 at 3:30 p.m. it was stated that, "the Owyhee River is a possible wild and scenic river," however; this designation has NOT been approved by Congress yet and "could take up to fifty years".

We believe that there is already an existing route to be followed that would result in far less devastation to the county, environment, people, and the State of Oregon. We strongly urge that Oregon Energy Facility Siting Council (EFSC) deny this site certificate and force Idaho Power back to the drawing board to apply for alternate routes!

Sincerely,

Handwritten signature of Carl A. Morton and Julie Morton in cursive script.

Carl & Julie Morton

1248 Klamath Ave

Nyssa, OR 97913

Email: [cnjmorton@centurylink.net](mailto:cnjmorton@centurylink.net); Phone: (home): 541-372-2860 (cell): 208-740-0249

SEPT 30

# 2002 Resource mgmt Plan Vale District

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

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

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

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

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

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

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

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

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

Utility corridor widths may be reduced in size and may be limited to valid existing rights-of-way widths or the accumulation of rights-of-way widths where a particular utility corridor is bordered on both sides by SMA's such as WSA's, ACEC's, NWSR's, and VRM Class I and II areas. See Appendix L and Table L-1 for possible development limitations on corridors due to the location of various SMA's. It may be necessary to refer to the appropriate SMA sections of this plan or records in the Vale District Office for more detailed information.

BLM policy encourages the facilitation of siting for wind or solar energy facilities. Such sites may be established on public lands in the area covered by the SEORMP where not in conflict with valid existing uses or established resource management objectives.

**Monitoring:** Normal BLM accomplishments and plan implementation tracking process.

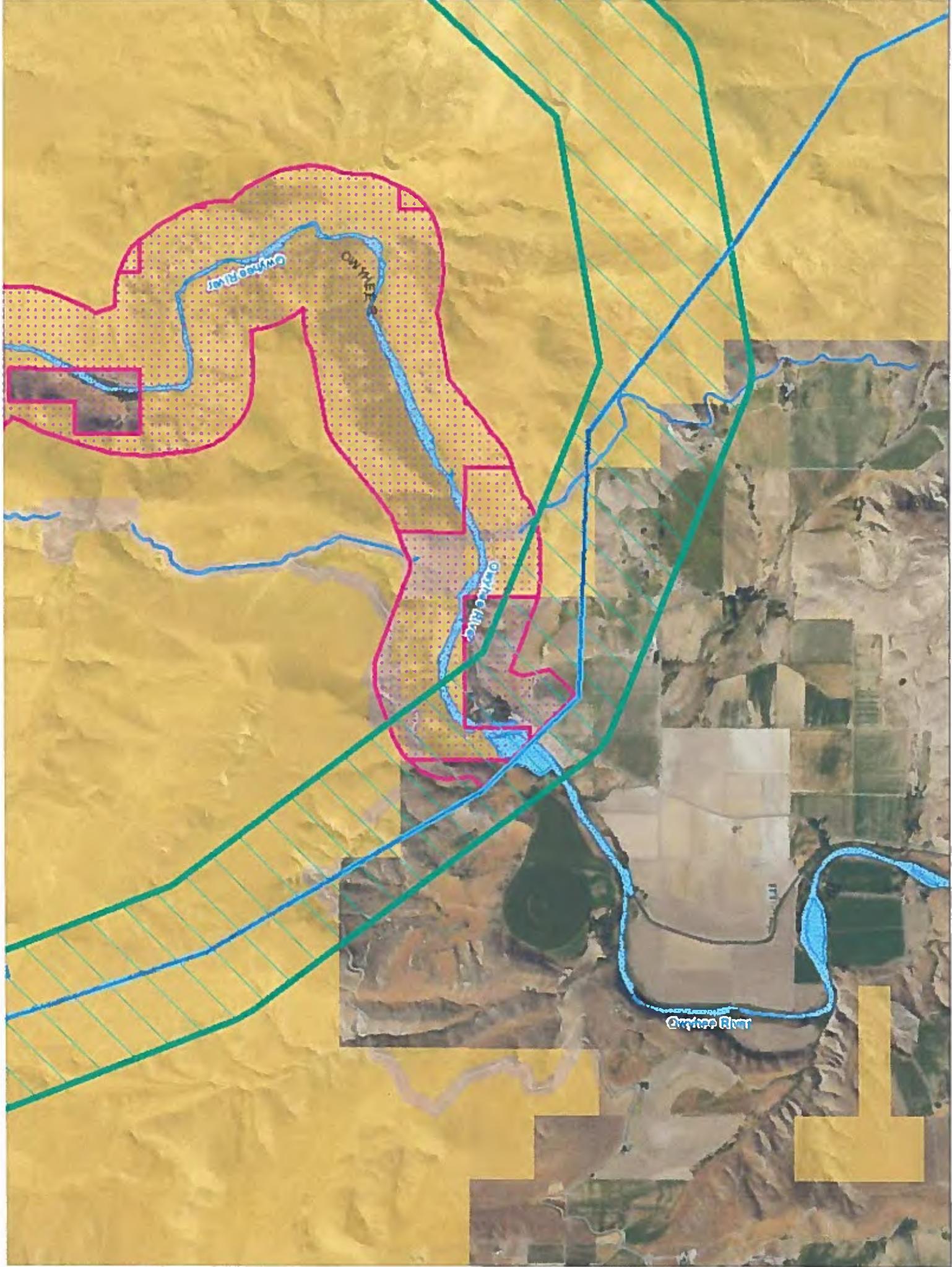
**Management Actions:** 1) Designate new utility corridors and continue or discontinue the designation of existing corridors for trans-district electric transmission lines identified by the Western Regional Corridor Study (WRCS), Federal and State highways, county or BLM roads, and railroads (see Appendix L, Table L-1). Corridor width will vary 500 to 6,000 feet on each side of the centerline of existing facilities as identified on Map LAND-1 except for the following: (a) where the alignment forms the boundary of an SMA, and the corridor will be outside the area, and (b) corridor designations will minimize impacts to natural values consistent with other resource values.

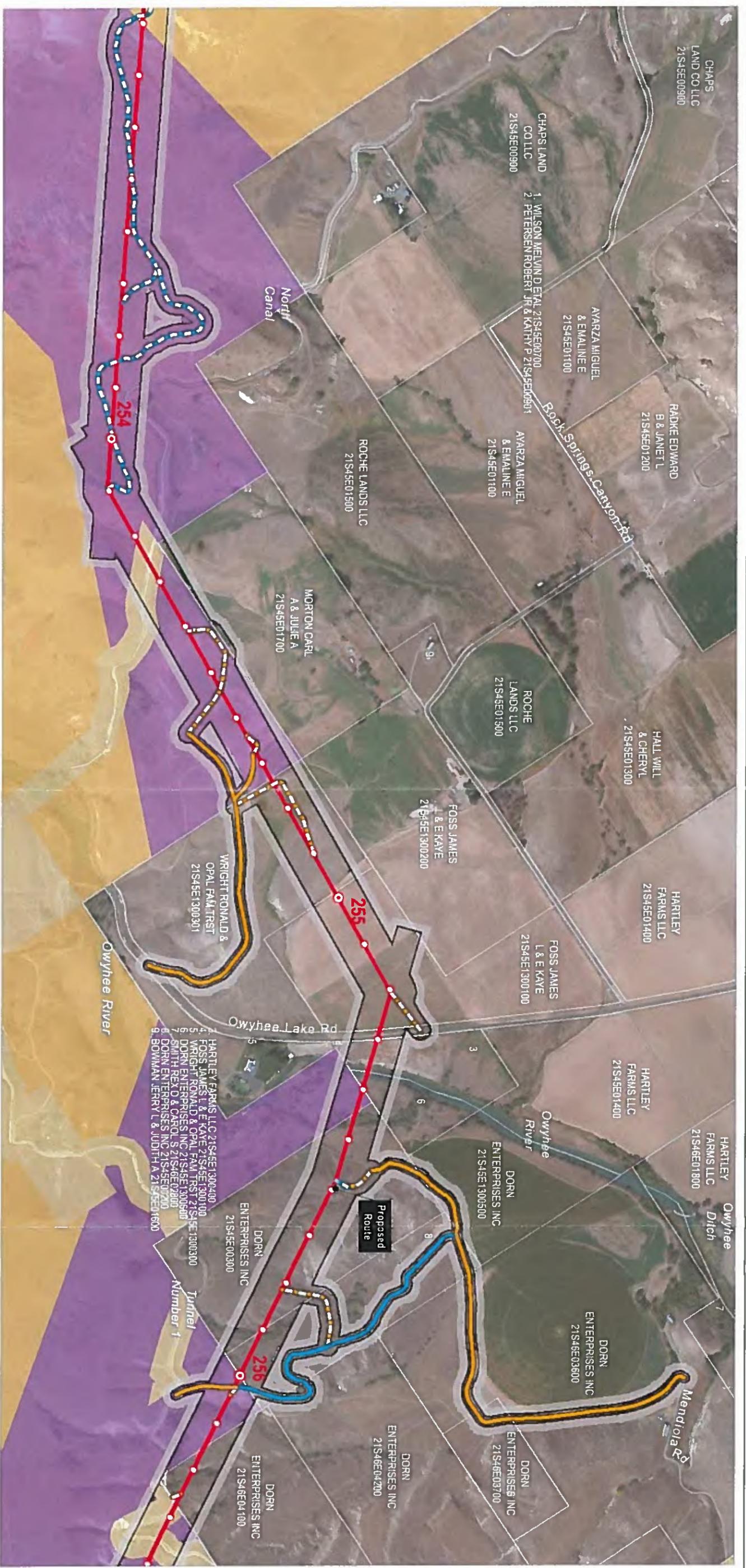
Because of prior decisions and commitments made in the MFP, OWFEIS, and the WRCS, the location of PP&L 500-kV existing route below the Owyhee Dam will remain the same. The MFP recommends a route which avoided the area of the dam by detouring to the north (see Map LAND-1). However, prior to the signing of the ROD of the MFP, a separate decision had already been made by the Secretary of the Interior and representatives of the Department of the Interior to allow construction of the 500-kV PP&L power line along the proposed original north route. Although the detour was considered very early in the route selection process, the route was not selected as described in the MFP and thus was not implemented. The OWFEIS (see Map 7 of the OWFEIS) recognized the existing constructed 500-kV PP&L power line route as a primary recognized existing route for location of future power line interties. The WRCS used the existing constructed power line route and information obtained in the OWFEIS document for its report and maps. Therefore, the location of the PP&L 500-kV existing route below the Owyhee Dam will remain the same. Proposals for future interties through this area will be scrutinized very closely and some limitations or modifications of structures could be imposed in order to minimize impacts to natural resource values contained within the proposed ACEC and recommended NWSR below Owyhee Dam. The proposed dogleg route (see Item 3) will also be considered as a routing alternative.

General centerline corridor widths will be as follows: (a) 500 feet BLM and county roads, (b) 1,000 feet Federal and State highways, (c) 6,000 feet Interstate 84 corridor complex with multiple right-of-way users, (d) 1,500 feet large electric transmission interties (existing and proposed), (e) 1,000 feet smaller electrical transmission lines, (f) 1,000 feet large and small pipeline transmission lines, and (g) 1,000 feet railroads (see Appendix L, Table L-1 for existing and potential corridors).

2) De-designate proposed MFP alternate 500-kV route. The PP&L 500-kV power line (north route) was constructed further to the south below the Owyhee Dam (see above). The MFP alternate 500-kV route will be replaced by the new proposed 500-kV dog leg route which will be located further to the north (see map LAND-1). Approximately 22 miles of public land right-of-way corridor will be involved.

3) De-designate proposed PP&L power line (south route) right-of-way corridor as listed in the WRCS to protect natural values and avoid SMA conflicts.





0 1,000 Feet

OREGON

Sources: BLM, County Assessor's Office (various), IPC, Esri, DigitalGlobe, GeoEye, Earthstar  
 Geographics, CHESBROUGH OS, AEX, Geomapping, Aerotrig, IGN, IGF, swisstopo  
 Z:\GIS\ServBoardman\_Hemingway\Reports\017\_Landowner\_Outreach\Interactive\_Web\Interactive\_Parcel\_Map\_MALHEUR\_20180804.mxd

- Parcels**
- Landowner Name/Parcel # (Current as of March 2016)
  - Project Features
  - Site Boundary (Oregon Only)
  - Proposed Route
  - Milepost
  - Mile
  - Tenth-mile

- Access**
- Existing Road, Substantial Modification, 21-70% Improvements
  - Existing Road, Substantial Modification, 71-100% Improvements
  - New Road, Bladed
  - New Road, Primitive
  - New Road, Primitive
  - Bureau of Land Management
  - Bureau of Reclamation

- Private
- Designated Utility Corridors
- Vale District (BLM) Utility Corridor

Boardman to Hemingway Transmission Line Project  
 Application for Site Certificate

**Parcels**  
 Malheur County  
 Map 125

## TARDAEWETHER Kellen \* ODOE

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**From:** Ed Mosiman <emosiman@gmail.com>  
**Sent:** Sunday, August 18, 2019 7:14 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Idaho Power application for a site certification for the Boardman to Hemingway transmission project 9/28/2018; Draft proposed order 5/23/2019

Dear Chair Beyeler and Members of the Council,

I am writing you to express my concern over the transmission line plan noted above, for many reasons such as view shed, wildlife habitat disruption, wildfire risks and others. I specifically wish to address native plant community disruption and the almost certainty of introduction and worsening of nonnative, noxious weeds proliferation. As a commercially licenced herbicide applicator by the state of OR, I recognize the need for significant measures that IPC must take to avoid problematic introduction of noxious weeds or destructively spread existing infestations. This will take ongoing surveying and treating areas for weeds several times a year for the entire time of not only construction but operations and management of the corridor. There is considerable research establishing the longevity of these weed seed germination potential, even put to many decades. This should be coordinated with the county weed program and require washing stations for vehicles going into and leaving the work site to minimize weed seed dispersal. Idaho Power cannot comply with these or other state standards in this area and EFCE should deny the site certificate.

Ed Mosiman  
1710 2nd Street  
La Grande, OR 97850  
[emosiman@gmail.com](mailto:emosiman@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) David Moyn

Mailing Address (mandatory) 1804 2<sup>nd</sup>  
La Grande OR 97850

Phone Number (optional) ( ) \_\_\_\_\_ Email Address (optional) \_\_\_\_\_

Today's Date: 6/20/19

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

Written comments can also be submitted today.

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

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

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6/20/19

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

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/18; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am objecting to the proposed routing of the BTH transmission line through Union County. I am a resident of La Grande, and I live less than a mile from the proposed route.

In its Application for Site Certificate, Idaho power states: that the project "is not likely to result in significant adverse impacts to scenic resources and values identified as significant or important in local land use plans, tribal land management plans, and federal land management plans for any lands located within the analysis area described for the Project. (Exhibit R P1)

This conclusion is far from the case. The argument supporting it can only be made by narrowly focussing on specific clauses in the Union County Land Use Plan, while mentioning (and then ignoring) the Plan's general and overarching purpose: "The natural beauty of Union County is worthy of preservation and should be preserved consistent with the stated purposes of this Plan" (p. 9). The Plan Policies acknowledge the state planning goal to conserve open space and protect natural, cultural, historic and scenic resources, stating "development will maintain or enhance attractiveness of the area and not degrade resources" (pp. 33-34). The Application bases its ignoring of the general purpose of the County Land Use Plan basically by saying "if an area isn't specifically mentioned, it lies outside of the purview of the plan and doesn't need evaluation:" Per the Application: "The Recommendations section of the plan (pp. 46-47) contains a heading for Open Space, Scenic and Historical Areas, and Natural Resources, but none of the five recommendations under that heading address scenic resources." (Exhibit R P 23/24)

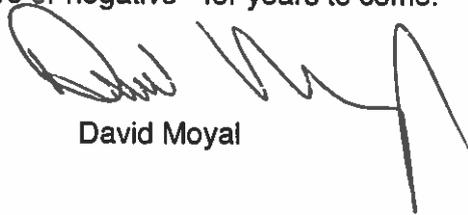
The application goes on to describe several appendices to the County Plan, but finds also that none of them will be impacted by the project.

The logic behind this dismissal of scenic resources impact is flawed. The County, in defining specific areas of concern, can't possibly anticipate every possible project that might deleteriously affect County viewsheds. Hence the general "mission statement" of the plan, cited above. This mission statement needs to be addressed needs to be addressed in the application before conclusions regarding scenic values can be reached.

I would also like to point out the injustice in the exclusion of the City of La Grande from the permitting and siting process. More than any other municipality, we are impacted by this project - yet, because it lies immediately outside our city limits we are excluded (beyond a City Council Proclamation opposing the project) from the decision making process. Please remember as you

render your decision that you'll be gone tomrrow, but we'll be living with the effects of your decision - positive or negative - for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Moyal', with a long, sweeping vertical stroke extending downwards from the end of the signature.

David Moyal

David Moyal  
1804 2nd St  
La Grande OR 97850  
moyald@gmail.com

Page 30

1 factories, commercial facilities, businesses and homes.  
 2 But the way that we use energy today is based more on  
 3 power electronics and direct current, which is the  
 4 format Thomas Edison preferred. Many of the new  
 5 resources in energy, such as solar and battery energy  
 6 storage, are inherently DC, which is resulting in a  
 7 mismatch between AC, which is the transmission line  
 8 we're talking about, and the DC-based resources and  
 9 loads.

10 And he talks about how this electricity  
 11 resources include not only cleaner natural gas plants,  
 12 but distributed solar and wind farms located mainly in  
 13 rural areas. This new paradigm was enabling options for  
 14 smaller regional microgrids as a method of building  
 15 greater resiliency, reliability, and security in our  
 16 power infrastructure. And these are defined by smaller  
 17 geographical boundaries. Microgrids essentially contain  
 18 enough energy resources to meet the demands.

19 And nowhere in the application does Idaho  
 20 Power talk about having looked at microgrids as an  
 21 option.

22 So I asked myself: Why is Idaho Power looking  
 23 at this long transmission line? Well, the US Department  
 24 of Energy report that I cited previously says that:  
 25 Currently power groups, like the American Electric

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1 Power, is not building new power plants; they are  
 2 retiring power plants, but they are expanding their  
 3 transmission network because it provides reliable  
 4 financial returns at a time when an industry's main  
 5 source of income, power generation, is flat.

6 And so I was very concerned that the whole  
 7 siting methodology may not have looked at this, and I  
 8 was wanting to make sure that you folks heard that.

9 HEARING OFFICER WEBSTER: Thank you very much.  
 10 Following Mr. Moyal, we will have Roger Barnes  
 11 on deck.

12 UNIDENTIFIED SPEAKER: Mr. Barnes is not here.

13 HEARING OFFICER WEBSTER: Well, then we are  
 14 going to skip Mr. Barnes and we will hear from JoAnne  
 15 Marlette after --

16 MR. MOYAL: David Moyal.

17 HEARING OFFICER WEBSTER: Yes, your turn, and  
 18 then Ms. Marlette.

19 MR. DAVID MOYAL: Thanks for allowing me to  
 20 speak to members of the Council --

21 HEARING OFFICER WEBSTER: A couple things. If  
 22 you would use the microphone, if you would state your  
 23 name and your address, and if you would read a little  
 24 bit slower so the court reporter can take it down.  
 25 MR. MOYAL: I will.

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1 My name is David Moyal, and my address is 1804  
 2 Second Street here in La Grande. I appreciate the  
 3 opportunity to speak to the members of the Council.

4 I object to the proposed routing of the B2H  
 5 transmission line through Union County. I'm a resident  
 6 of La Grande, and I'm very concerned because I live not  
 7 much more than a mile from the proposed route. In its  
 8 application for site certificate, Idaho Power states  
 9 that the project is, and I quote, "not likely to result  
 10 in significant adverse impacts to scenic resources and  
 11 values identified as significant or important in local  
 12 land use plans, tribal land management plans" --

13 HEARING OFFICER WEBSTER: Mr. Moyal, if you  
 14 would move the mic a little closer to you.

15 MR. MOYAL: Closer still? Is this okay?

16 HEARING OFFICER WEBSTER: Yes.

17 MR. MOYAL: -- "and federal land management  
 18 plans for any lands located within the analysis area  
 19 described for the project."

20 But this conclusion is far from the case. The  
 21 arguments for it can only be made by the narrowest  
 22 possible interpretation of specific clauses in the Union  
 23 County land use plan. The plan's general and  
 24 overarching purpose, and I quote Union County's general  
 25 plan, is: "The natural beauty of Union County is worthy

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1 of preservation and should be preserved consistent with  
 2 the stated purposes of this plan."

3 It goes on to say on page 33 that the  
 4 development will maintain or enhance the attractiveness  
 5 of the area and not degrade resources. The application  
 6 ignores the general purpose of the plan, basically  
 7 saying, and I paraphrase it, if an area isn't  
 8 specifically mentioned in the plan, in County's plan,  
 9 then it lies outside the purview of the application and  
 10 doesn't need evaluation.

11 The logic behind this dismissal of scenic  
 12 resources impact is flawed. The County, in defining  
 13 specific areas of concern, couldn't possibly in the  
 14 1970s have anticipated every possible project that might  
 15 deleteriously affect County viewshed, hence the general  
 16 mission statement of the plan, which I quoted earlier,  
 17 needs to be addressed in the application before  
 18 conclusions regarding scenic values can be reached.

19 I'll go off topic a little bit. I would like  
 20 to point out the injustice in the exclusion of the City  
 21 of La Grande from permitting and siting process. More  
 22 than any other municipality we are impacted by this  
 23 project, yet because it lies immediately outside our  
 24 city limits we are excluded beyond the City Council  
 25 proclamation opposing the project from the

Page 34

1 decision-making process.  
 2 Please remember as you reach your decision,  
 3 that you'll be gone tomorrow, but we'll be living with  
 4 the effects of your decision, positive or negative, for  
 5 years to come. Thank you very much.  
 6 HEARING OFFICER WEBSTER: Thank you.  
 7 Following Ms. Marlette we will be hearing from  
 8 Virginia Mammen.  
 9 Good evening.  
 10 MS. MARLETTE: Hi. Thank you for allowing us  
 11 to speak to you this evening. I am JoAnne Marlette,  
 12 2031 Court Street, Baker City, Oregon. You will  
 13 probably hear pretty much what I said last night.  
 14 As you are all well aware, Oregon has an  
 15 existing utility corridor which was set in place during  
 16 the administration of Governor Tom McCall. I knew Tom  
 17 McCall; as a matter of fact, I typed the first draft of  
 18 his mother, Dorothy Lawson McCall's, book, "Ranch Under  
 19 the Rimrock."  
 20 It was his love of this ranchland in Central  
 21 Oregon that led him to his commitment to preserve farm  
 22 and forestland. And in the early 1970s, as governor, he  
 23 signed Senate Bill 100, which created a statewide land  
 24 use regulatory system aimed at preserving farm and  
 25 forestland.

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1 Knowing how important preserving farm and  
 2 forestland would be, a utility corridor was set from  
 3 Boardman, Oregon, to the Idaho border, so that issues  
 4 such as what we are having right now would not exist.  
 5 All utilities would have their own corridor and would  
 6 not encroach on farm and forestland in other parts of  
 7 the state. Idaho Power has consistently claimed using  
 8 our existing utility corridor would cost too much money.  
 9 From what I could find, it appears to me that  
 10 Idaho Power is not going through our public lands  
 11 because the environmentalists would be after them like  
 12 stink on a dog, perhaps even suing Idaho Power for all  
 13 the reasons we are objecting to it coming through our  
 14 private property here in northeastern Oregon. I'm sure  
 15 they don't want to spend tons of their money defending  
 16 this B2H proposed project through our public lands with  
 17 impending threats of lawsuits at their every turn.  
 18 Also, I find quite a discrepancy as to need.  
 19 My research shows the market is not growing. Idaho  
 20 Power's billed sales for the last 10 years have been  
 21 essentially flat, if not declining. That is supported  
 22 by reports from the US government and Idaho Power's own  
 23 data.  
 24 And I will be providing further written  
 25 comment prior to the July 23rd deadline. Thank you so

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1 much.  
 2 HEARING OFFICER WEBSTER: Thank you.  
 3 Following Ms. Mammen, we will be hearing from  
 4 Adrian Henderson.  
 5 SECRETARY CORNETT: Because we are recording  
 6 it and we have people on the phone, if everybody could  
 7 speak into the mic, it will be much more helpful for us  
 8 and those on the phone.  
 9 MS. VIRGINIA MAMMEN: I'm Virginia Mammen. I  
 10 live at 405 Balsa here in La Grande. I have lived on  
 11 Balsa, off Modelaire/Hawthorne Loop for 50 years, and I  
 12 love and appreciate the area in which I live. Through  
 13 those years I have learned to appreciate the area in  
 14 which I live. Although, I have learned that the land  
 15 around me, not only under my house, but far up into the  
 16 hills above me are to be respected as much as my  
 17 neighbors are to be respected.  
 18 During that time I have also learned that  
 19 although I have taken good care of my body, age and time  
 20 demand that I not push it any farther than necessary or  
 21 it will break down in one place or another.  
 22 So too the hills west above my house. As I  
 23 have watched this land creak and grown with the seasons,  
 24 it has been plagued with fire, drought, and flooding. I  
 25 have learned it is to be respected as a living being and

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1 should not be pushed. In 2010, this area was determined  
 2 to be a hazard area and unstable. It moves and shifts  
 3 with the nudges from Mother Nature making appearances  
 4 down below my house with cracks and other minor  
 5 nuisances.  
 6 I don't see any respect for our hills or me or  
 7 my neighbors if B2H comes into our area, which is rated  
 8 "high" or "very high" as a landslide area, while not  
 9 just to give our hills an occasional push, but to slam  
 10 them with dynamite, create massive holes, introduce  
 11 excessively heavy weight and strip them of their beauty,  
 12 pride, and spirit while opening the opportunity for  
 13 causing the changing of the underground water paths and  
 14 land stability and introducing possible new elements for  
 15 fire hazard. Any one of these could create catastrophic  
 16 danger to the formerly quiet neighborhood below that I  
 17 have enjoyed for 50 years.  
 18 The disturbance of a soil and track-out would  
 19 pollute the clean area which we cherish. Then there is  
 20 the noise pollution from both construction and completed  
 21 project. To me this is not progress in the making but a  
 22 total lack of respect and appreciation for both people  
 23 and the land.  
 24 I would invite you to come walk my  
 25 neighborhood with me, on the streets meant not for

6/20/19  
Energy Facilities Siting Council  
c/o Kellen Tardaewether, Sr. Siting Analyst  
Oregon DOE  
550 Capitol St. NE  
Salem, OR 97301

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Sincerely,

David Moyal

David Moyal  
1804 2nd St  
La Grande OR 97850  
moyald@gmail.com

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1 to your home. Microgrids would be nice. Instead the  
 2 trouble is we are locating wind farms such as the one in  
 3 the once naturally scenic Pyles Canyon south of  
 4 La Grande, the wind farms and once beautiful Columbia  
 5 River Gorge, and the wind farm in the once scenic Burnt  
 6 River Canyon on the way to Boise.  
 7 These unreliable sources of energy are far  
 8 from your home and the load they serve. These energy  
 9 sources load the power lines and increase power line  
 10 losses. This unnecessary transport of very unreliable  
 11 power has created the need for more ability to transport  
 12 power.  
 13 Idaho Power, PacifiCorp, and Bonneville Power  
 14 Administration are responding to the requirements that  
 15 power be maintained to your house whether or not the  
 16 wind is blowing, and they are keeping this power system  
 17 together whether or not the wind is blowing.  
 18 A big item in our lives is electric cars.  
 19 Transportation accounts for a huge part of our national  
 20 energy usage. We want to be able to provide energy for  
 21 electric cars. Electric cars hog a lot of electric  
 22 power. That will require nearly double the electric  
 23 output of our power system. Let's don't stall electric  
 24 cars because of stalling a power line.  
 25 Please don't pass the mess of a weak

Page 139

1 infrastructure of our power system to our children and  
 2 all the people in the Northwest. Let's allow Idaho  
 3 Power Company, PacifiCorp, and Bonneville Power  
 4 Administration to drive without their brakes on. Let's  
 5 allow Idaho Power Company, PacifiCorp, and BPA to heat  
 6 their house with the windows closed.  
 7 If we want to have unreliable energy sources  
 8 such as the wind farms located far from where the  
 9 electric load is, let's provide the power lines to carry  
 10 the load and maintain system stability. If we want to  
 11 provide for a huge electrical energy increase to support  
 12 electric vehicles, then Idaho Power Company, PacifiCorp,  
 13 and BPA have the power lines they need to handle the  
 14 load.  
 15 I understand your feelings about where to put  
 16 the line. Let's not allow our power system to become an  
 17 obsolete mess for our children. Let's figure out the  
 18 best place to locate B2H. Please make some siting  
 19 suggestions to the Commission and to Idaho Power  
 20 Company.  
 21 Thank you.  
 22 HEARING OFFICER WEBSTER: Thank you.  
 23 MR. ROD MUILENBURG: My name is Rod  
 24 Muilenburg. I reside at 412 16th Street, La Grande,  
 25 Oregon.

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1 From what I am understanding this form  
 2 provided by Idaho Power, the long and short, from what I  
 3 understand, Oregon is supposed to take one for the team  
 4 for the sake of Idaho. That makes me wonder. What is  
 5 it about the Idaho infrastructure and Idaho's power grid  
 6 that determines the demand from Oregon? It also makes  
 7 me wonder, why is it that you insist it be in our  
 8 backyard and not in your backyard?  
 9 I've been here my whole life. I remember the  
 10 fire of '73. I remember how hard people worked to save  
 11 their houses. I remember the sun disappearing, and I  
 12 remember a tinder box ready to go. And you want to go  
 13 with an overhead power system that the world doesn't  
 14 even recognize anymore. The world puts power grids  
 15 underground today. It's the future. It's how we do it.  
 16 You are taxing a system that doesn't have to be taxed.  
 17 These lines, they inevitably are overtaxed, and they  
 18 droop, they hang, and they cause fires. And as I said,  
 19 we've have got a tinder box surrounding us.  
 20 I don't know if we want to go through the  
 21 inevitable again of having another fire. I don't know  
 22 if we want to suffer the inevitable outcome that  
 23 happened to Paradise, California, when they had only  
 24 time enough to grab their purse and wallet and the  
 25 shirts on their backs before their house was rendered to

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1 a mere foundation and a fireplace and the rest is a  
 2 toxic waste element. Do we want to go through that?  
 3 And then I heard only yesterday that a diamond  
 4 factory in Washington is going to demand enough voltage  
 5 to supply 10,000 people to manufacture synthetic  
 6 diamonds. I don't know when this ends.  
 7 But I've listened to all these people behind  
 8 me talking about the eyesore we are going to see,  
 9 talking about the impact. And they are mentioning  
 10 things I haven't even considered; hearing problems,  
 11 sound transmission lines. There's a whole lot involved  
 12 that we have just barely touched the tip of the iceberg.  
 13 And is it a requirement that Idaho have its power in the  
 14 first place?  
 15 I don't know, I am just thinking we have got a  
 16 lot of small cities, too, with the prevailing winds  
 17 around this area, Ukiah, and all these little cities  
 18 surrounding here, and how bad will it be? Is there  
 19 enough fire suppression? Is there enough accountability  
 20 for the environmental impact?  
 21 I don't think anybody here has weighed this  
 22 whole thing out until they attended this forum tonight.  
 23 Which, by the way, I appreciate you putting it on. I  
 24 appreciate you being here. I appreciate Idaho Power for  
 25 allowing us to voice our opinions.

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1 But historically, like I said, the Oregon  
 2 Trail, we have to consider it. We have got the  
 3 procurement of land, and apparently no letters were  
 4 offered for the initial route before anybody had a  
 5 chance to respond. And now this new thing comes in and  
 6 we all get a surprise.  
 7 I think a lot of people have a lot more to say  
 8 about this than me; so I'm just going to yield back my  
 9 time.  
 10 HEARING OFFICER WEBSTER: Thank you.  
 11 Following Irwin Smutz, we have Jeri Watson,  
 12 and then I don't know if Idaho Power wants to -- okay.  
 13 So then we will hear from Idaho Power after that.  
 14 MR. IRWIN SMUTZ: My name is Irwin Smutz, and  
 15 I live at 59074 Foothill Road. My ranch borders the  
 16 game refuge. I have got two oil lines, two gas lines,  
 17 and two fiberoptic lines, and the power line that, I  
 18 think your alternative route, I think the preferred  
 19 route is going to be just above that power line.  
 20 I have two concerns: One of them is the fire  
 21 danger. That present power line set a fire a few years  
 22 ago close to Ladd Canyon. The people that ran the power  
 23 line, a long distance line, failed to keep the brush cut  
 24 underneath the line, and the tree grew up and that line  
 25 arced and started a fire.

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1 Also, in the site, the area where they are  
 2 going to put the proposed power lines through that you  
 3 are talking about is in an unstable area. My dad went  
 4 up and checked the cows when I was a boy, and he got up  
 5 to this real steep unstable area, and the ground had  
 6 shifted because of another line that came through, an  
 7 oil line, it shifted, and this pipe came out, out of the  
 8 ground 5 or 6 feet in the air and made a bend.  
 9 Fortunately, it did not break, or oil or gas or whatever  
 10 they put through that, would have ran down the hill.  
 11 Well, this proposed power line is going  
 12 through that area where that shift was. They cut  
 13 through shale type ground, and they kind of loosened the  
 14 thing up. So that's a thing that really kind of  
 15 concerns me. Of course, we have a lot of game of all  
 16 kinds, we border the game refuge.  
 17 But I would just like to share that this is  
 18 one problem that you would have. The building site  
 19 where all my buildings are on the ranch there are down,  
 20 of course, at the bottom of the hill, and I guess the  
 21 building site where my buildings are slid off the top of  
 22 the mountain some time in prehistoric history. And the  
 23 geologist out there told Dad, I guess the rest of it  
 24 will stay up there. But that line is going to be going  
 25 right across that unstable land.

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1 And also it was kind of hinted at by another  
 2 speaker, where the hospital is, that is really unstable,  
 3 too. They had to put in a huge amount of cement to try  
 4 to keep that thing from shifting, the new building that  
 5 they put there at the hospital.  
 6 The site that my house is on is also shifting.  
 7 I have a board fence and they have all pulled away from,  
 8 in places they have pulled away from the posts because  
 9 the building site is going down the hill. Well, that is  
 10 a thing that you are dealing with on the power line  
 11 going through that area.  
 12 So I just really appreciate you listening to  
 13 me, but I am concerned. These people have serious  
 14 concerns, it makes a really big difference. You can put  
 15 these things through and they'll pay so much a foot to  
 16 go through and then you put up with it for the rest of  
 17 your life.  
 18 Just an example, I went to put some fence  
 19 across all those pipe lines, and somebody came out and  
 20 told me I was not allowed to put any steel posts in the  
 21 fence going across that because some of the, I guess the  
 22 fiber optic lines or something were only underneath the  
 23 line about 4 inches they said.  
 24 So I really appreciate you folks listening.  
 25 And I just wanted to share that with you. I have had

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1 quite a bit of experience on things coming through my  
 2 land, and it does have everlasting consequences once  
 3 these things go through.  
 4 Thank you very much.  
 5 HEARING OFFICER WEBSTER: All right. Jeri  
 6 Watson.  
 7 MS. JERI WATSON: Hello. Long day. I really  
 8 appreciate you all being here. And I'm Jeri Watson,  
 9 J-e-r-i, W-a-t-s-o-n, and I live at 1906 Foley Street in  
 10 La Grande.  
 11 I've been here for about 40-some years. And I  
 12 moved here, I came from a city in California called  
 13 Torrance, and I moved here to teach school, knowing that  
 14 I wouldn't make the kind of salary here that I would  
 15 make in places that I was capable of going. I'm not  
 16 trying to be modest, but I'll just give you an idea of  
 17 my qualifications. I could teach, I'm certified in  
 18 special ed, high school, elementary school, I speak  
 19 three languages; one being Spanish. The others are  
 20 Japanese and obviously English. I was at the top of my  
 21 class at University of Southern California, and I really  
 22 could have gone anywhere if money was important to me.  
 23 Enough money to get by is important.  
 24 But my folks didn't want me to come here.  
 25 They said, You can't eat the scenery. But I live every



# Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Jerry Myers  
Mailing Address (mandatory) ~~68477~~ 68477 Little Butte Cr Rd  
Heppner OR 97836  
Phone Number (optional) 541-376-8322 Email Address (optional) \_\_\_\_\_  
Today's Date: 6/27/19

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

Written comments can also be submitted today.

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

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

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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

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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.

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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

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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

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1 38 years to pay for that. It took a long time. I had  
 2 to pay for -- of course, my folks, I had to pay for  
 3 them. And then when they died, then they were finally  
 4 passed on to all the relatives, but then it was all  
 5 developed and done up in the first place. And I had to  
 6 add quite a bit for the federal tax payment or income  
 7 tax. It took a long time, but I finally got that done.  
 8 Next, one of the things that I find around  
 9 here is looking -- if you look they have a really nice  
 10 map out there on the computer up there. That is pretty  
 11 nice. It's much better than I ever saw anywhere. And I  
 12 would like to have it bigger and be able to have more  
 13 items that we can see, just to read the paper. So I  
 14 don't know why -- I don't why they need to do it so  
 15 tiny.  
 16 Some other item, a night from last night,  
 17 which is last night, it was lightning. And we have a  
 18 lot of lightning for some reason. They like it in  
 19 those, it's just partly in the flat county and part of  
 20 it is up in the hills. They get up pretty close to get  
 21 it into the mountains. That was a big item.  
 22 Now, I have many things about the towers, and  
 23 I don't know about them. I don't know anything about  
 24 them. Are they made of wood? Are they made of steel?  
 25 Are they just a single pole that goes up? I haven't

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1 heard anything like that. I thought I got pretty good  
 2 educated from all these papers that we get once a while,  
 3 but apparently we don't.  
 4 Since my farming, there is 2 miles of these  
 5 towers that go through 2 miles of -- touches to my land.  
 6 I do not know what the special would be. I understand  
 7 that it is 6 feet -- or 600 feet wide of something in  
 8 space in the ground. I don't know that. On my place  
 9 there is nothing on it except soil and good dirt.  
 10 Once in a while they used to, they used to  
 11 have wood posts with a steel fence, just making a fence.  
 12 It's only 4 feet high. Now we don't have any. We took  
 13 them all out, cleaned them all up. So that is the way  
 14 it goes nowadays.  
 15 But on those towers, do they call them towers  
 16 or poles, or whatever you call them, how high do they  
 17 go? How do they go across the ground? Are they a  
 18 quarter of a mile or are they a few hundred feet? I  
 19 have not heard any of this. So I'm guessing I'd like to  
 20 know things that way.  
 21 I think I'm about done. Thank you very much.  
 22 HEARING OFFICER WEBSTER: Thank you,  
 23 Mr. Myers.  
 24 Okay. Next we will have Mark Stokes from  
 25 Idaho Power.

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1 MR. MARK STOKES: Good evening, Chair Beyeler,  
 2 Vice Chair Jenkins, other Council members, staff. Thank  
 3 you again.  
 4 My name is Mark Stokes from Idaho Power  
 5 Company. I'm the engineering project leader for the  
 6 Boardman to Hemingway Project. My address is 21 West  
 7 Idaho Street, Boise, Idaho 83702.  
 8 I do have a few comments I would like to make  
 9 tonight before we get to some of your questions. To  
 10 start out with, on Thursday night, last week, there was  
 11 a person that made a comment that Idaho Power did not  
 12 have any customers in Oregon, and I attempted to correct  
 13 that during my testimony at the end after that session.  
 14 And the number that I put out was incorrect. So I want  
 15 to get that corrected on the record.  
 16 The number that I gave you was 15 percent of  
 17 our load is for Oregon customers. That number is  
 18 actually approximately 3 1/2 percent of our total load.  
 19 And then also to add to that, we have a little over  
 20 19,000 customers between Malheur and Baker County.  
 21 Let's see, the next piece I wanted to address,  
 22 and I have been holding off doing this because over the  
 23 course of last week and the two hearings this week there  
 24 have been a lot of comments made that really get back to  
 25 the need for the B2H project, and it really does go back

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1 to the Integrated Resource Planning process.  
 2 According to EFSC's guidelines, standards, the  
 3 Council relies on determination of need, they rely on  
 4 the opinion of the Oregon Public Utilities Commission.  
 5 There is a fair amount of information in Exhibit N that  
 6 addresses the IRP and that whole piece of that  
 7 long-range planning process. We go through and we  
 8 update that plan every 2 years.  
 9 The IRP that is in our current application,  
 10 that is in your hands right now, was filed in 2017, by  
 11 June of 2017. And it was acknowledged, I believe it was  
 12 May of 2018 when the Oregon PUC acknowledged that IRP.  
 13 And it's literally that acknowledgment of the action  
 14 plan in the IRP that establishes the need for whatever  
 15 resources or actions are proposed in there. And very  
 16 specifically in that 2017 IRP, we asked the Commission  
 17 to acknowledge certain construction activities related  
 18 to B2H and they did grant that.  
 19 Jump forward 2 years, right now we have just  
 20 completed our 2019 IRP that will either be filed  
 21 tomorrow or next Monday with the Oregon Commission. And  
 22 our intent is to go ahead and file that with ODOE so you  
 23 have an updated copy of that.  
 24 There is a lengthy regulatory process that we  
 25 have to go through with the PUC, and so I would not

## TARDAEWETHER Kellen \* ODOE

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**From:** Sam Myers <smyers@eoni.com>  
**Sent:** Sunday, June 23, 2019 5:19 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** b2h, ODE SITTING COUNCIL(1)  
**Attachments:** b2h, ODE SITTING COUNCIL(1).pdf

b2h, ODE SITTING COUNCIL(1)



Sent from my iPad

Sam Myers

68453 little Butter Creek Rd.  
Heppner, Or. 97836  
Sam.myers84@gmail.com

June 23, 2019

Energy Facilities  
c/o Kellen Tardaewether, Senior siting Analyst  
Oregon Department Of Energy  
550 Capital St. N.E.  
Salem, OR. 97301

Via EMAIL: [B2H.DPOCCComments@Oregon.gov](mailto:B2H.DPOCCComments@Oregon.gov)

Subject: Idaho Power Application for Site Certification for the Boardman to Hemingway Transmission Project 9/28/18; Draft Proposes Order.

Dear Chair Beyeler and Members of the Council:

As an operator of a Century Oregon Farm directly impacted by the proposed transmission line. I am opposing this project because of the extreme fire danger it places on the livelihood of our entire operation. Our dry-land farming cropping system operates near the eastern edge of Morrow County and has been successfully producing wheat for many decades; a fire would be a catastrophic event that would reduce our ability to stay in operation.

The climate of our farm is such that we see many low Relative Humidity months and frequent "Red Flag" warnings are placed over our area in the summer. This is a huge problem for us. I believe we are being placed under an undue amount of danger from fire; specifically from the higher voltages proposed for this transmission line!

The soils that support our crops do not recover quickly from fires that occur during the pre-harvest fully mature stage of our crops, during this stage there is a very high fuel load created by the crop itself. A fire during this stage of the cropping cycle will devastate the soil for many years!

I do not believe that a "Right of Way" should be able to take away a person's livelihood! A very small fire occurred on a neighboring field some 6 years ago, I was able to fight that fire myself along with other responders, it was a post harvest fire most likely caused by a motorist's cigarette, this fire had repercussions for 2 cropping cycles, some 4 years later a reduced yield was reported to me by the farm's owner.

Please so do not allow this proposed transmission line to be placed over our farm.

Sincerely

Sam Myers

I do not believe this is acceptable risk we should suffer!  
This “Right of Way” could take away our ability to financially survive!  
Urna Semper

**TARDAEWETHER Kellen \* ODOE**

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**To:** B2H DPOComments \* ODOE  
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# Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Sam Myers

Mailing Address (mandatory) 68453 Little Bottom Cr. Rd  
Heppner, OR 97836

Phone Number (optional) ( ) \_\_\_\_\_ Email Address (optional) SAM.MYERS@con1.com

Today's Date: 6/27/19

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

Written comments can also be submitted today.

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

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

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1 intention at this time and we'll circle back to you and  
 2 give you the opportunity.  
 3 I don't hear anybody on the line.  
 4 So I will call up the people with the cards  
 5 that I have here. But before I do that, I have at this  
 6 point four comment cards. I expect that some more will  
 7 trickle in. Because we have allotted several hours or a  
 8 few hours for this, I will not put any time constraints  
 9 on anybody this evening. But I do ask that you be  
 10 succinct in your comments. And as Kellen had indicated,  
 11 keep them -- the more effective the better for us.  
 12 Any requests that are made to EFSC will be  
 13 brought up at the conclusion of the public testimony  
 14 opportunity of the hearing.  
 15 Today's hearing, as well as all of the public  
 16 hearings on the Boardman to Hemingway draft proposed  
 17 order, are being documented by a certified court  
 18 reporter, and there will be transcripts of the testimony  
 19 made available after completion of the public hearings.  
 20 We are also recording the hearing tonight.  
 21 The presentations, written comments and oral  
 22 testimony are part of the decision record for the  
 23 proposed facility.  
 24 And then for the legalese. Pursuant to OAR  
 25 345-015-0220(5)(a) and (b), please note the following:

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1 A person who intends to raise any issue that may be the  
 2 basis for a contested case must raise the issue in  
 3 person at the public hearing or in a written comment  
 4 submitted to the Department of Energy before the  
 5 deadline, which we just indicated has been extended to  
 6 August 22.  
 7 A person who intends to raise any issue that  
 8 may be the basis for a contested case must raise the  
 9 issue with sufficient specificity to afford the Council,  
 10 the Department, and the applicant an adequate  
 11 opportunity to respond, including a statement of facts  
 12 that support the person's position on the issue.  
 13 To raise an issue in a contested case  
 14 proceeding, the issue must be: Within the Council's  
 15 jurisdiction; raised in writing or in person prior to  
 16 the close of the hearing record comment period, which  
 17 is, as we have now said several times, is August 22,  
 18 2019; raised with sufficient specificity to afford  
 19 Council, the Department of Energy, and the applicant an  
 20 adequate opportunity to respond.  
 21 And as we have stated previously, to raise an  
 22 issue with sufficient specificity, the person must  
 23 present facts that support the person's position on the  
 24 issue.  
 25 We will now begin the public testimony portion

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1 of the hearing. I will ask that when I call the speaker  
 2 up, the first thing you do is provide your name and  
 3 spelling and your address for the record, so that the  
 4 court reporter can have that information.  
 5 And the first person coming up to give  
 6 testimony is going to be Sam Myers. Mr. Myers.  
 7 MR. SAM MYERS: My name is Sam Myers. S-a-m,  
 8 last name M-y-e-r-s. Our address is 68453 Little Butter  
 9 Creek Road, Heppner, Oregon.  
 10 Thank you for allowing me to be here. Again,  
 11 my name is Sam Myers. I operate a family-owned dryland  
 12 wheat farm on the eastern edge of Morrow County. I am  
 13 here with my father, Jerry Myers, who is in agreement  
 14 with the comments that I'm about to make.  
 15 If I could, so I understand fully, when I'm  
 16 opposed to the project, do I call it the order or the  
 17 proposed order? Does it make a difference?  
 18 HEARING OFFICER WEBSTER: It doesn't really  
 19 make a difference. If you have concerns about -- you  
 20 would have concerns about the draft proposed order or  
 21 parts of the application. So either one of those two  
 22 would be where you would be addressing your concerns.  
 23 MR. SAM MYERS: My argument against the  
 24 proposed order has to do with and relates to the issues  
 25 regarding a fire. My arguments do not have to do

Page 25

1 with -- they assume that the transmission lines are  
 2 going to light fires and that we have not come to a  
 3 conclusion that that doesn't happen. So my testimony  
 4 tonight wants to shed light on the issues that I have  
 5 regarding a potential fire from these transmission  
 6 lines.  
 7 The damage that concerns me the most is  
 8 long-term. Even more than the loss of buildings,  
 9 dwellings or equipment or crops that are destroyed, it  
 10 is the damage from an in-crop fire that is detrimental  
 11 to our soil and our livelihood. Buildings can be  
 12 rebuilt, equipment can be replaced. But the moment a  
 13 fire hits the soil, the soil can be damaged.  
 14 The cropping system this transmission line  
 15 crosses over is one of our really most prized fields,  
 16 untouched in many ways from any of mankind's buildings  
 17 or roads, so to speak. It is our job to manage this  
 18 field, and we do so, with respect to the soil, as best  
 19 we can.  
 20 We work to maintain the soil. Our livelihood  
 21 depends on the soil. We have to consider soil organic  
 22 matter, soil microbes, soil structure, and sequestering  
 23 as much rainfall into this soil as possible due to our  
 24 low rainfall area. The soil is our most precious  
 25 resource, and preserving its health is our top priority.

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1 Firsthand experience, along with the counsel  
 2 from the researchers at Columbia Basin Research Center  
 3 near Pendleton, Oregon, have revealed to me that a fire  
 4 in our dryland crop, which this transmission line goes  
 5 over, does destroy the crop. In their words, a  
 6 gentleman I talked to this morning, a researcher, I  
 7 believe his name was Steve, said literally a fire takes  
 8 the life out of a soil.  
 9 Here's what a fire does specifically to a  
 10 soil. It burns off organic matter. It kills the  
 11 microbial colonies that are needed for soil health. It  
 12 destroys the carbon-nitrogen cycle that we depend on to  
 13 break down the previous crop into nutrients that can be  
 14 used for the next one.  
 15 It destroys soil structure. Soil structure is  
 16 critical for the ability of the soil to hold water and  
 17 also for the soil to be able to take higher rates of  
 18 water into it before it's eroded. Fire also creates a  
 19 wind erosion potential. In our area that's very  
 20 critical.  
 21 The long-term loss from soil damage could  
 22 threaten our livelihood. That is because the soil  
 23 rebuilding process takes years, perhaps 6 to 10 years,  
 24 to fully recover from a fire. Again, this is firsthand  
 25 knowledge and counsel from the research center.

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1 The revenue loss encountered by the soil  
 2 destruction would be financially disastrous to us. We  
 3 currently have no protection from that kind of loss. We  
 4 are simply exposed to that risk.  
 5 The second issue that I think is specific to  
 6 our area is our climate. We have very dry conditions in  
 7 the spring, late spring and summer, sometimes into the  
 8 fall, with low relative humidity. Our area has some of  
 9 the lowest relative humidity percentages over a cropped  
 10 land of perhaps any place in the state. These dry  
 11 conditions do not suppress the ignition of a fire.  
 12 The National Weather Service issues red flag  
 13 warnings. We had one just a few days ago. I spoke with  
 14 the National Weather Service and had quite a  
 15 conversation with the gentleman there. Red flag  
 16 warnings happen a couple times during June, July, and  
 17 August in our area, sometimes even into September.  
 18 These warnings indicate that a fire can spread rapidly  
 19 upon ignition. The red flag warning is an indication  
 20 that widespread fire damage can occur.  
 21 Now, just to clarify, the Weather Service  
 22 cannot predict a fire; it can predict the possibility,  
 23 the probability of a lightning strike in your area. So  
 24 it also depends on determining fire load and other  
 25 weather conditions that can make a fire possible.

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1 What happens to our crop as it moves from a  
 2 small green, leafy plant and matures towards harvest to  
 3 this time of year, what they characterize as a living  
 4 load, a green, leafy plant, turns into what they call a  
 5 dead fire load. The Forest Service uses these  
 6 designations as they seek to understand how potentially  
 7 dangerous a fire can be in the forest.  
 8 So when our crop approaches a dead fire load  
 9 at full maturity, the fire that could happen at that  
 10 point in time is devastating to the soil. It does all  
 11 the things that I previously mentioned in destroying  
 12 that soil.  
 13 It is also important for me to note, however,  
 14 that a postharvest fire, fire when the crop has been  
 15 harvested, there is a significant height difference with  
 16 the remaining residue. It can also be very dangerous.  
 17 And those are the fires that I fought and had personal  
 18 comment from the neighbors describing to me years later  
 19 they can still tell where the yield reduces where the  
 20 line of the fire started.  
 21 This is the place we live in. These are the  
 22 climate conditions that we face; hot, dry, windy days,  
 23 wind speeds in the 20s or 30 miles per hour. They all  
 24 happen simultaneously. These are the conditions that  
 25 have me extremely concerned. If these transmission

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1 lines started a fire, it could spread for miles.  
 2 My goal here today is that you understand that  
 3 the destruction of our soil resource is very troubling  
 4 to me. The pennies we might receive from a right-of-way  
 5 to Idaho Power does not compensate us for the risk we  
 6 would bear. What is at stake here is our soil.  
 7 I would urge the Siting Council to consider  
 8 this testimony as it specifically relates to this area.  
 9 We cannot ignore the environmental damage to the soils  
 10 that could happen on an event that is possible almost  
 11 every year. Red flag warnings, like I mentioned, can  
 12 be -- we've seen them perhaps on average once a month,  
 13 maybe twice a month. Like I said, the Weather Service  
 14 lists those, put those out there so the general public  
 15 knows that if somebody is going to be doing something  
 16 that could potentially start a fire, it could spread  
 17 rapidly and cause massive amounts of damage.  
 18 So I thank you for being here and hearing my  
 19 testimony. When I had considered this project some,  
 20 almost 10 years old now, I can't believe that for  
 21 pennies for a right-of-way our farm could be devastated  
 22 financially. We could be left with nothing. Our  
 23 margins on that farm are small. There is no protection  
 24 for a 7-, 8-year yield reduction. We live with that  
 25 risk, and now we're adding potentially another risk

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1 factor to that environment.  
 2 There are other problems on our farm that I  
 3 have with this. We have an airstrip that will probably  
 4 be rendered useless because of the transmission lines'  
 5 location; we have Internet communication that could be  
 6 interrupted; and the cropping system that we use, most  
 7 likely I can't use an aerial applicator in that area.  
 8 It would make it extraordinarily more expensive to fly  
 9 next to this transmission line. So I have a lot to  
 10 lose. I have a lot to overcome if this happens.  
 11 So I appreciate the Council's consideration of  
 12 what I hoped to have made very specific, very real, very  
 13 credible information. We're talking about an  
 14 environmental problem and we're talking about destroying  
 15 a resource that could probably, in my opinion, there  
 16 might be better ways to serve the needs of power  
 17 somewhere else than making me live under such a  
 18 disastrous risk from the transmission lines.  
 19 Thank you very much.  
 20 HEARING OFFICER WEBSTER: Thank you,  
 21 Mr. Myers.  
 22 Next up is John -- is it Luciani?  
 23 MR. JOHN LUCIANI: I'm not quite ready,  
 24 please.  
 25 HEARING OFFICER WEBSTER: Do you want me to

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1 put you at the end of the line?  
 2 MR. JOHN LUCIANO: Please.  
 3 HEARING OFFICER WEBSTER: Next is Travis Eri  
 4 or Eri?  
 5 MR. TRAVIS ERI: That's correct.  
 6 Hello. Travis Eri. It's T-r-a-v-i-s, E-r-i.  
 7 Address is 17200 Northeast Sacramento Street, Portland,  
 8 Oregon 97230.  
 9 So to start with, my background, I'm a  
 10 journeyman lineman, having worked in the Pacific  
 11 Northwest, earning my certificate right here throughout  
 12 Oregon, Washington, and Idaho. I currently am the  
 13 business manager for International Brotherhood of  
 14 Electrical Workers, Local Union 125. And IBEW 125  
 15 represents the electrical workers throughout Oregon,  
 16 Washington, Idaho, and Montana, consisting of 3600  
 17 members in the utility and construction industry in all  
 18 sectors of construction, transmission, and distrib- --  
 19 or generation, transmission, and distribution services.  
 20 I'd like to start by recognizing all those who  
 21 may be in opposition of this project for various  
 22 reasons. My testimony is not to minimize any of their  
 23 concerns that they are here discussing today.  
 24 The IBEW was formed in 1891, and our purpose  
 25 and our mission was to stand for improving safety in the

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1 electrical industry. After over 125 years, our mission  
 2 still stands as that.  
 3 The things that I want to bring to light are  
 4 the IBEW is in agreement with this project. We're in  
 5 support of this project for all the reasons identified  
 6 by Idaho Power. But the most important is for balancing  
 7 the renewable resources throughout this region and the  
 8 Intermountain West.  
 9 When we look at the constraints that are on  
 10 current transmission right-of-ways, those constraints  
 11 lend to high-capacity time periods in which additional  
 12 transmission lines throughout our regions can help  
 13 minimize I think some of these fire concerns that a lot  
 14 of the public has. The more that a transmission line is  
 15 overloaded, the more likelihood or the potential for the  
 16 system to fail, and the more likelihood of those fires  
 17 could occur.  
 18 I'm not here to discuss the potential routing  
 19 as far as the benefits or the considerations that went  
 20 in prior to this. My testimony is just to discuss the  
 21 imminent need. Transmission lines throughout this  
 22 region as well as connecting the Intermountain West are  
 23 needed in order to balance the peak-and-valley nature of  
 24 our renewable portfolios.  
 25 The energy imbalance market is something that

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1 Pacific Power started several years ago, and many of the  
 2 utilities have joined into this. And it's nothing more  
 3 than basically sharing transmission authority between  
 4 different regions and taking advantage of  
 5 peak-and-valley natures of renewable portfolios.  
 6 What it allows for is a reduction in having to  
 7 spend resources to create new generation, allowing for a  
 8 lot of our carbon-emitting generation facilities to be  
 9 able to scale back and take advantage of excess  
 10 renewable in other areas.  
 11 The Boardman to Hemingway line, in what I have  
 12 seen from the studies, will do just that. It will  
 13 balance out renewable portfolios within the  
 14 Intermountain West, and the Oregon and Washington  
 15 Columbia River Gorge renewable portfolio, taking  
 16 advantage of those resources at different times when  
 17 they will be able to exchange power.  
 18 The additional benefit, other than easements  
 19 to those that are affected by the transmission  
 20 corridors, are also going to be felt through the  
 21 reduction in necessary transmission -- or sorry,  
 22 necessary generation being built in order to cover the  
 23 electrical needs of our communities.  
 24 And with Bonneville Power Administration  
 25 joining the energy imbalance market, all of the

## ESTERSON Sarah \* ODOE

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**From:** sam myers <sam.myers84@gmail.com>  
**Sent:** Wednesday, August 21, 2019 7:59 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** B2H project siting comment

Sam Myers  
68453 Little Butter creek road  
Heppner, Oregon 97836  
sam.myers84@gmail.com

August 21, 2019

Energy facilities  
c/o kellen Tardewether, Senior siting Analyst Oregon Department of Energy  
550 Capital St. N.E.  
Salem, Oregon, 97301

Via, email.. B2H.DPOComments@Oregon.gov  
Subject: Idaho Power Application for site Certification for the Boardman to Hemingway Transmisson Project 9/28/2019  
Draft Proposed Order.

Dear Chair Beyeler and members of the council:

After giving a oral presentation at the Boardman Oregon public comment meeting, I have even more concerns about the B2H Transmisson line routed over our farm in Morrow county.

It seems that those involved with the use, construction and rent of this transmission line will be enriched financially while those who's lives are directly impacted by the risks and dangers of the transmission line get very little compensation!! A one time right of way payment does not even begin to compare with the value of the energy that passes through the line! The fact is, this transmission line's necessity has come under scrutiny and rightfully so!! This line does not meet the "good of the public" criteria any more!! The money makers at play in this project seem to be pushing the project to make money while those people directly impacted, are only to suffer the risks!! I am disgusted that we could be so unfairly compensated/abused!! This transmission line produces; health risks, fire risks, not to mention cropping restrictions, communication problems, land use issues and yearly ongoing structure avoidance! These problems will make our farming existence even more difficult. All of this for a minimal one time payment, an absolute disparity!! We have heard from various sources that right of way payments could range from 8 to 10 thousand dollars for various properties; this does not even come close to the risks we would encounter from the this transmission line!! While others continue to financially gain year after year we are offered nothing for the continued risks we endure!!

I am extremely concerned about the voltage of this transmission line as well, it is the highest voltage used (500kv). I am concerned that our low humidity and high temperatures have not been studied enough to guarantee our safety!! As I stated in my oral presentation, fire is our biggest concern and with the 500kv line no one has studied its impact at our location or the conditions that exist on our farm, at this highest voltage. I would contend that we simply do not have safe conditions for this transmission line!! Our livelihood is at stake potentially 6 months of every year!! This is also disturbing to me that utility companies are not fully dealing with the risks and continue the process to build this transmission line; to solve a problem that has many other solutions!! Even a quick google search online reveal several sites detailing the facts about health dangers of the electromagnetic field surrounding a transmission line of this voltage!!

Please do not allow a disaster to unfold over our farm!,

Sincerely,  
Sam Myers

Sent from my iPad

**ESTERSON Sarah \* ODOE**

---

**From:** sam myers <sam.myers84@gmail.com>  
**Sent:** Thursday, August 22, 2019 1:19 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Weed Control Management Plan not consistent with Oregon or County requi...  
**Attachments:** Weed Control Management Plan not consistent with Oregon or County requi....pdf

I agree with this report and find the omission of a valid weed prevention plan to be completely unacceptable, I'm constantly fighting weeds in our farm, this would only make matters worse!!! Please do not allow the incomplete project we'd plan to continue!!

Sincerely  
Sam Myers

Sent from my iPhone

August 21, 2019

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

email: [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

**The Draft Proposed Order fails to control and treat Invasive Weeds resulting from the development.**

**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 as well as significantly increase the costs to private farm and forest owners to control noxious weeds.

Rules impacted with an example of the types 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. Please refer to the comments submitted by 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 rules and statutes 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.)

Comments provided by 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:

--OAR 345-025-0016 states, "In the site certificate, the council shall include conditions that address monitoring and mitigation to assure compliance with the standards contained in OAR Ch 35, Div. 22 and Div. 24. Given the speed with which invasive weeds can cause significant damage to surrounding habitat as well as agricultural and forest lands, the need exists to monitor and control noxious weeds on an annual basis during the life of the project.

The importance of this issue for the economic impact it has on the state is contained in Or. Report, 2014. That report estimated the economic impact of six invasive weeds studied was \$1.5 billion and \$2.4 billion personal income if infestation moved into the susceptible areas. This would represent 40.8 thousand jobs.

Following examples identify shortcomings in the draft proposed order and Noxious Weed Plan to meet the requirements of the above rules and statutes.

1. 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 statute requires cleaning to occur at the locations where equipment leaves or enters a public road or moves across a property boundary. Utilizing washing facilities located at multi-use areas or public facilities will not be consistent with the state statutes which the Oregon Department of Energy and Energy Facility Siting Council are required to adhere to.
2. 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. Multiple examples are provided for Category A weeds which occur along the proposed transmission line. For example, flowering and seed production for the List A invasive weeds occurs as early as March for Scotch broom and extend into October for Purple loosestrife. These are both on List A.
3. **\*Section 1.3 of the Draft Plan indicates the following, "IPC will only be responsible for the control of noxious weeds that are within Project right-of-way(ROW) and that are a result of the company's construction- or operation-related surface-disturbing activities. For EFSC purposes, IPC is not responsible for controlling noxious weeds that occur outside of the Project ROW's, or for controlling or eradicating noxious weed species that**

**were present prior to the Project. With respect to pre-existing weed infestations, IPC recognizes Oregon Revised State (ORS) Chapter 569 imposes onto occupiers of land within a weed district certain obligations to control and prevent weeds; if IPC identifies pre-existing weed infestations within a Project ROW, IPC will work with the relevant landowner or land management agency to address the same consistent with ORS Chapter 569.”**

As noted in the August 22, 2017 communication, IPC is responsible for all weed infestations in the right of way, regardless of whether or not they existed at the time the transmission line right of way is assumed just as any person assuming a right of way would be responsible.

4. **\*Section 2.1, Page 4 , last sentence in section, states counties were contacted to determine if each county requires specific noxious weed control methods or best management practices “No specific best management practices were requested by any of the county weed management personnel contacted.”**

Contrary to this statement, Union County Weed Control submitted 31 comments and concerns developed by the weed supervisors of Morrow, Umatilla, Union County, Dept of Agriculture and Tri-County CWMA and incorporated comments from previous meetings with Malheur and Baker County weed supervisors. Most of those requirements submitted on August 22<sup>nd</sup>, 2017 do not appear in the draft proposed order or the Draft Weed Management Plan. The site certificate needs to include a condition requiring the Weed Management Plan to include these 31 items. The Draft Proposed Order and Draft Weed Management Plan fail to assure that the counties (as well as private landowners) will not sustain significant and ongoing financial consequences due to the failure of Idaho Power to control the invasive weeds which will be introduced and the numbers increased due to the development of this transmission line. It is, therefore, imperative that the counties receive the proposed final Weed Management and Habitat Restoration Plans for their approval prior to being implemented; and an advisory council of private landowners should be included.

5. **\*Section 5.0 repeats the limit of IPC’s responsibility** and lists specific areas which with existing roads only includes areas involving ground-disturbing construction and/or improvements (e.g. new cutouts.)

IPC is responsible for all noxious weeds within the site boundary as well as noxious weed infestations outside the site boundary if the development and/or use of the ROW contributed to the increase in noxious weeds. IPC is responsible for areas of overland travel which they indicate they will be using as well as any weed infestations occurring as a result of IPC use of other roads.

6. **\*Section 5.0 , Page 18, also states “IPC is not responsible for controlling noxious weeds that occur outside of the Project ROWs or for controlling or eradicating noxious weed species that were present prior to the Project.”**

IPC states they will work with landowner to deal with pre-existing weeds consistent with ORS Chapter 569. IPC is responsible for all weeds inside the ROW which are there once they assume control of the transmission line corridor. In addition, they are responsible for any increased number or species of weeds that occur as a result of the development action they are proposing.

7. **\*Section 5.2.1 Vehicle Cleaning: States construction contractors vehicles and equipment will be cleaned prior to arrival at the worksite.**

It fails to require vehicles and machinery to be cleaned prior to moving onto public road or require vehicle and machinery cleaning as construction progresses along ROW and moves from one property owner to another. The plan indicates that will be determined by land management agency and ODOE. The requirement is dictated by statute and the land management agency and ODOE do not have the authority to overrule the statute.

8. **\*Section 5.2.3 “ On BLM or USFS land the construction contractor may be required to provide additional treatments to prevent return of noxious weeds where topsoil is removed (i.e., pre-emergent pesticides).”**

The Weed Management Plan for Private and State lands needs to include this option as determined by the local weed management supervisor.

9. **\*Section 5.3.2, page 24, paragraph 1 states that Idaho Power will identify areas where preconstruction noxious weed control measures will be implemented.**

Preconstruction noxious weed control measures need to be implemented wherever noxious weeds exist.

10. **\*5.3.4 Page 24 states: “Noxious weed control efforts will occur on an Annual Basis for the first 5 years post-construction. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will consult with ODOE to design an appropriate plan for long-term weed control. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, or may request a waiver from further noxious weed obligations at these sites. If a waiver of noxious weed control is granted, it will include justification for how the waiver is consistent with the appropriate EFSC standards.” This is repeated in Section 6.1, Page 25.**

This section does not support management of noxious weeds for multiple reasons including:

1. During the first five years after construction, weed control needs to occur on a timeline that addresses the weeds present at the location as determined by Idaho Power and the local Weed Supervisor. Annual control does not account for the timing for noxious weed species going to seed.
2. Following the initial 5 year period, noxious weed control needs to occur at least annually for the life of the project as IPC will be using the ROW on an ongoing basis for repairs, monitoring, inspection, vegetation management, etc. In addition, there may be unauthorized uses of the transmission line right of way by such things as ATV's, hunters, etc. that increase noxious weeds due to the access the developer is providing by building the transmission line. These impacts must be addressed by the developer.
3. Noxious weed control efforts are planned to occur annually for the first 5 years post-construction and can end sooner if ODOE concurs that noxious

weeds have been controlled. Noxious weeds will not be controlled absent ongoing monitoring and treatment for the life of the project. No waiver of annual control and monitoring of noxious weeds should occur due to the fact that in a single year, large numbers of plants can occur given that some of these plants disperse at least 900 to 1,500 seeds as the previously referenced and attached information sheets on some of the plants on the A list confirm.

11. **\*Section 6.2 The annual Noxious Weed Monitoring Report is only planned to be submitted to IPC and ODOE and land management agencies as required.**

These reports should also be submitted to the County Weed Control Supervisors and private land owners. Idaho Power needs to be designated as the responsible party for completion of things such as annual reports rather than “construction contractors.” If Idaho Power wants to contract with a construction contractor to complete these for their approval and submission, they have the option of doing that. The contractors will change and there will be no continuity in terms of methodology, reporting, etc.

12. **\*Section 6.3 Ongoing Monitoring and Control “IPC will be responsible for monitoring and control of noxious weed infestations as set forth in the terms and conditions of the ODOE Site Certificate, BLM ROW grant, and USFS special-use authorization. The BLM, USFS, ODOE, and counties may contact IPC to report on the presence of noxious weed populations of concern within the ROW.” “IPC will control the weeds on a case-by-case basis in consultation with the land management agency and/or landowner, as appropriate.”**

Following a report of a noxious weed infestation, IPC needs to provide the information including the location of the noxious weed population and consult with the local weed management supervisor to identify an appropriate plan of action.

13. **\*Section 8.0 Places responsibility for development of Final Noxious Weed Plan, documentation of existing infestations adjacent to the survey area, documenting results of the preconstruction noxious weed inventories, mapping areas subject to preconstruction noxious weed treatment, and providing a detailed control methodology for each noxious species, etc. to “The Construction Contractors”.**

Idaho Power is assuming no responsibility and the accompanying accountability for this program or the results. The developer needs to be listed as the responsible party.

14. **\*Section 3.2 states “existing site-specific disturbances and land uses (e.g. grazing, grading, etc.) that could be contributing to the introduction, spread, or viability of weed populations were also recorded.”**

This information should only be used to identify areas where the opportunity provided by the construction and operation of the transmission line could provide an opportunity for an increased occurrence of noxious weeds. It should not be used to provide the developer an excuse for not meeting their responsibility for monitoring and controlling weed infestations which are going to be stimulated due to the existence of the transmission line. The draft weed management plan

provides ongoing references which indicate that IPC does not consider themselves responsible for noxious weeds when they are present in areas outside the ROW or when they result from things such as recreational use, grazing, other construction projects, natural occurrences, or when the developer did not physically disturb the area. It needs to be clear that the existence of the transmission line will increase the numbers and species of invasive weeds absent ongoing monitoring and treatment which the developer is required to provide.

15. **\*Section 5.3.1.3, Third Paragraph, Page 22 says herbicide and application rates will be approved by “County Weed Supervisors or Superintendents”. Top of Page 23 says “Herbicide will not be applied prior to notification and receipt of written approval from the applicable land management agency, ODOE, or private landowner.”**

This section appears to allow ODOE to determine what herbicides are used. Appears at least some landowners will have “landowner agreements.” Developer needs to be required to develop landowner agreements with willing landowners and provide written notice to any landowner who’s property will be sprayed with chemicals so that the unless there is a landowner agreement, the impacted landowner can determine if chemicals should be used, and if there should be any restrictions based upon the conditions on their land or adjoining land such as organic gardening, necessary setbacks due to flowing water or wetlands, sensitive plant species, etc.

16. **Page 23, final paragraph says, “Final species-specific noxious weed control methodologies will be included by the Construction Contractor(s) in the Final Noxious Weed Plan.”**

The noxious weed plan is the responsibility of Idaho Power and should involve the county weed control agency as well as the landowner.

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 wildlife 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. Native plant species are at risk of depredation, some to the point of extinction, if weeds are not controlled.

The application and draft proposed order lacks conditions that will keep noxious weeds from spreading within the counties and the state. There is no serious effort to provide mitigation for the negative impacts of the spread of weeds within habitat or on agricultural or forest land.

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. For this reason, the concerns listed in this letter need to be addressed in the site certificate and the following site certificate conditions need to be included.

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 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. Advisory consultation of landowners and professionals will be part of the county approval process.
- 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 in areas that should not be impacted by weeds on the ROW. In the event that noxious weed infestations increase at a rate greater than similar areas located in sample plots, Idaho Power will treat or 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.

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,

**ESTERSON Sarah \* ODOE**

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**From:** Kathy Myron <krmyron@frontier.com>  
**Sent:** Tuesday, August 20, 2019 4:32 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

August 20, 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](mailto: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'm writing in protest of the proposed Boardman to Hemingway Transmission Line Project. Specifically, I'm 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.

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's 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,

Kathy Myron  
640 N. 9<sup>th</sup> St.  
Union, OR 97883  
[kmyron@frontier.com](mailto:kmyron@frontier.com)  
(541)562-5629

August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

In summary:

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

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



Signature



Printed Name

Mailing Address:

## **TARDAEWETHER Kellen \* ODOE**

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**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" <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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." <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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." <sup>5</sup>

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

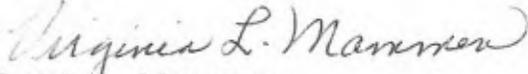
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

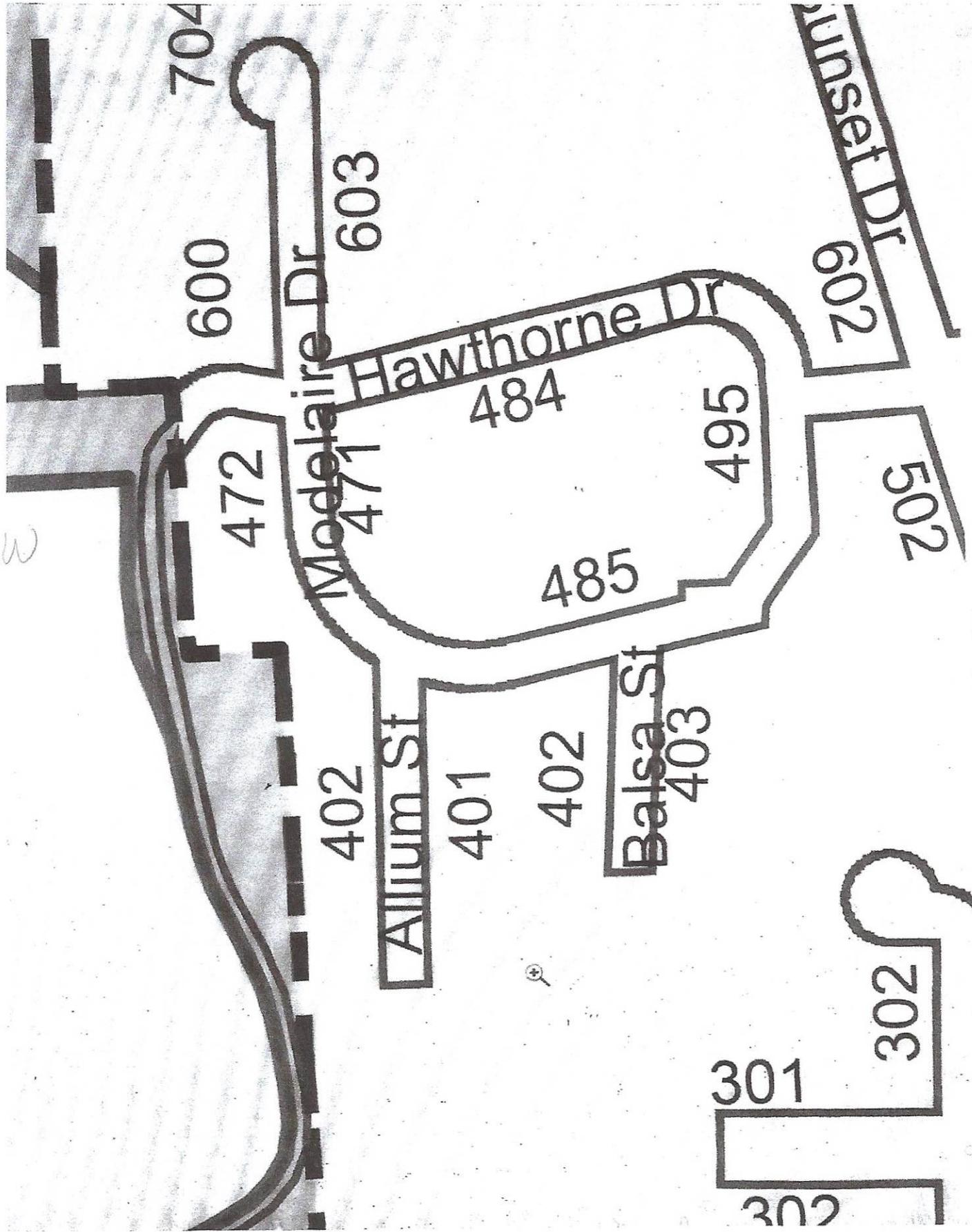
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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.

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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](http://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

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>proposed helipad is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p>	<p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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

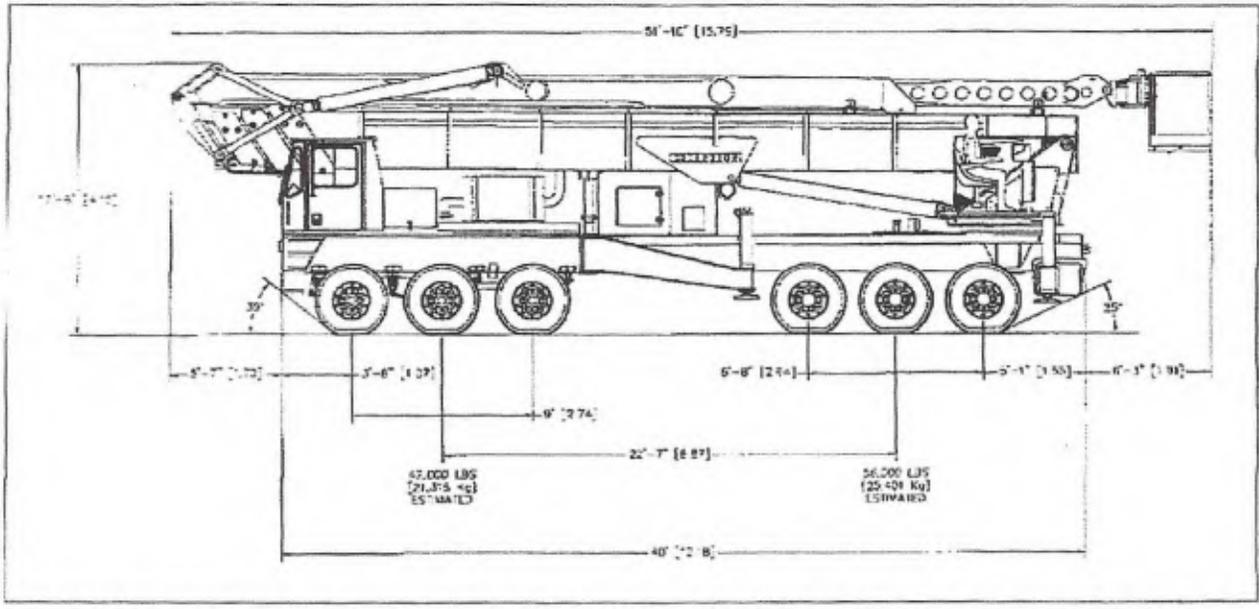


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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 tips 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
<b>Totals</b>	–	–	<b>620</b>	–	–	<b>188</b>

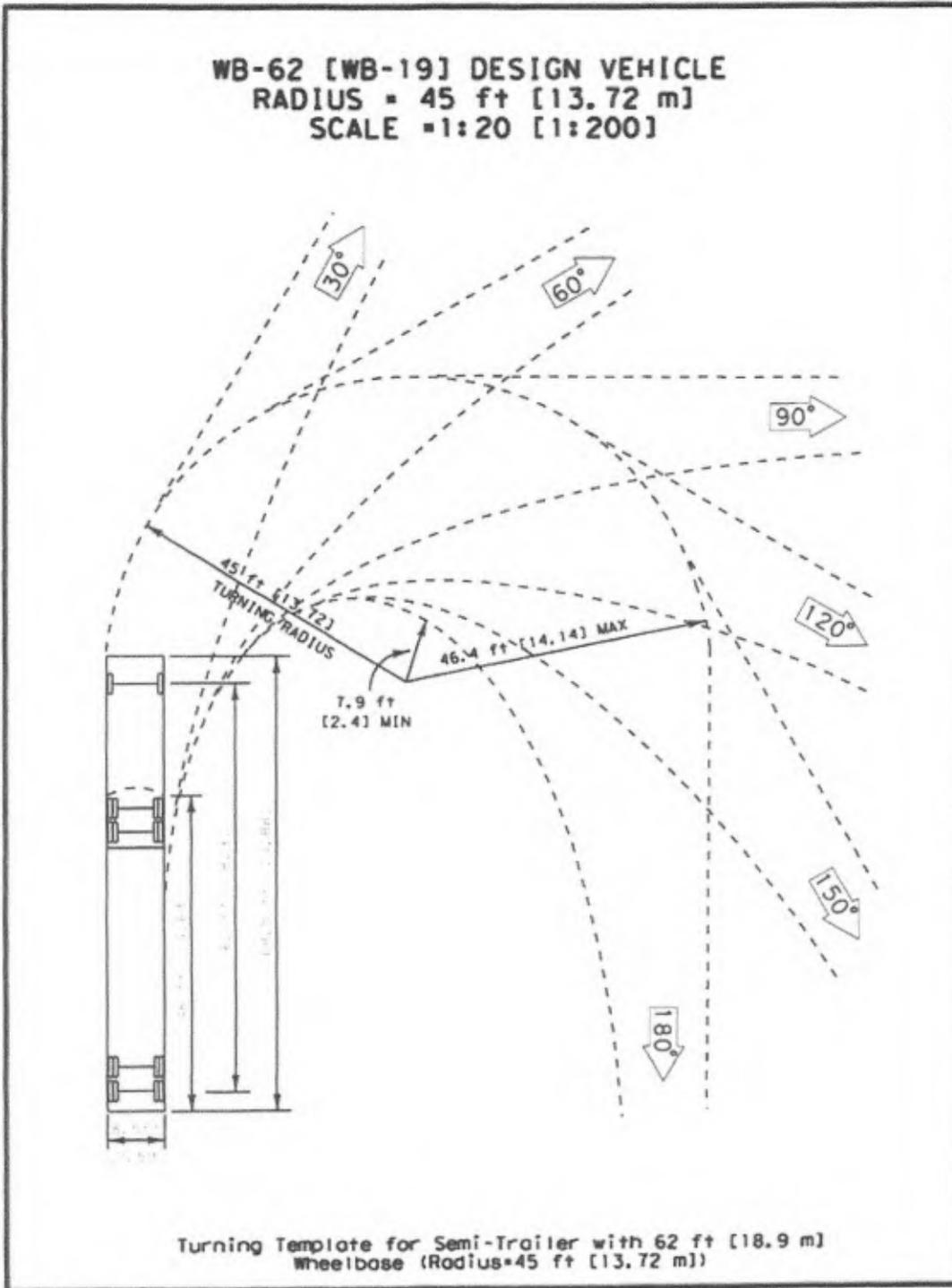


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

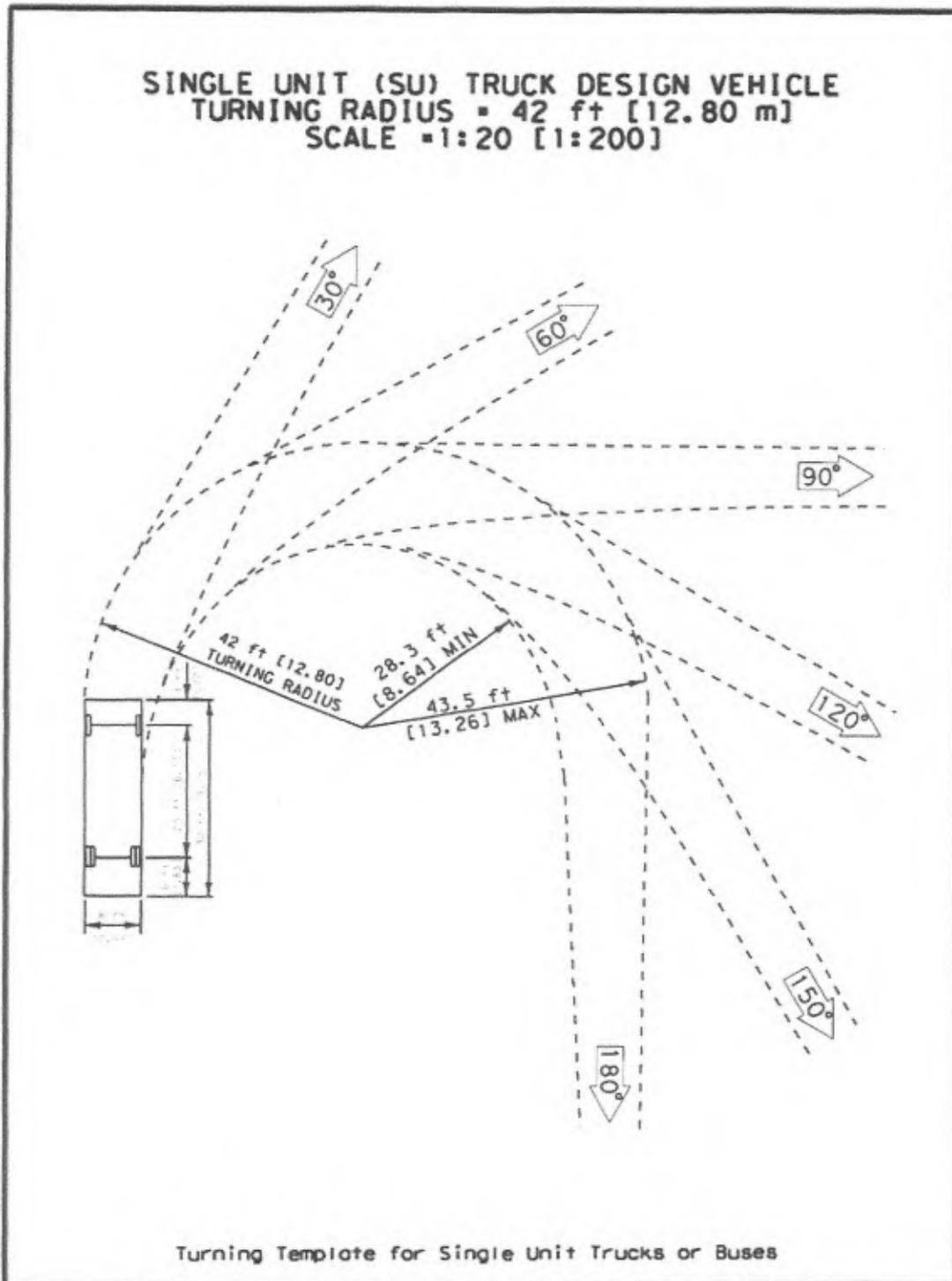


Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

**Section 2.** APPLICABILITY OF STATE TRAFFIC LAWS.

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

**Section 3.** DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

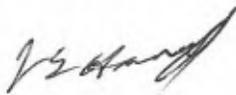
**Section 17. TRUCK ROUTES**

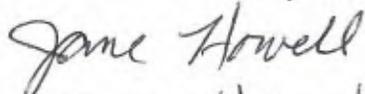
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

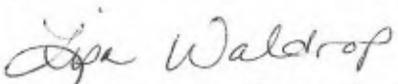
**Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES**

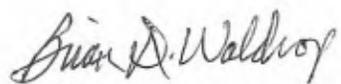
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

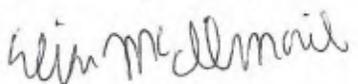
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

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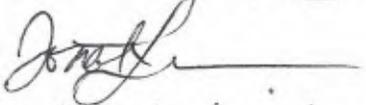
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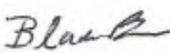
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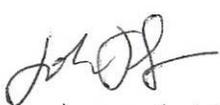
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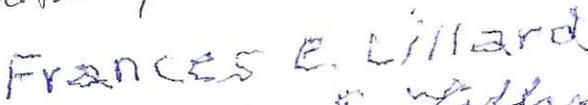
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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community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

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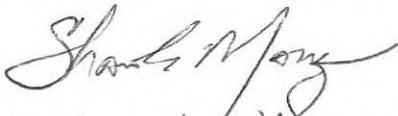
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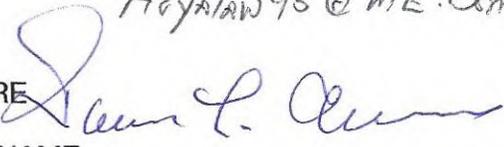
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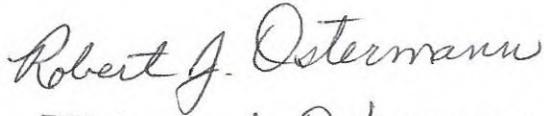
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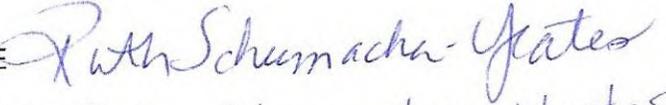
SIGNATURE   
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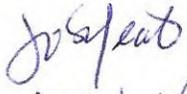
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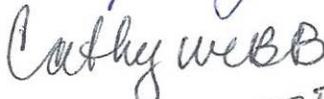
SIGNATURE   
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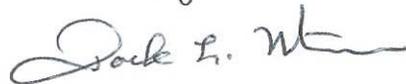
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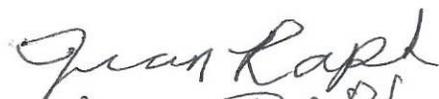
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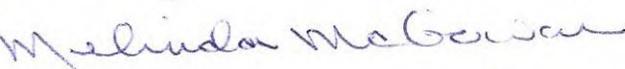
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SIGNATURE   
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SIGNATURE *Gary D. Pierson*

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SIGNATURE *Lynn Wheeler Duncan*

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EMAIL hnull@comi.com

SIGNATURE *Bert R. Frewing*  
PRINTED NAME Bert R. Frewing  
ADDRESS 709 South 12<sup>th</sup> 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  
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SIGNATURE *Robin L. Maille*  
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SIGNATURE *Bruce C Kevan*  
PRINTED NAME *Bruce C Kevan*  
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EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*  
PRINTED NAME CAROL S. SUMMERS  
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EMAIL carolsummers1935@gmail.com

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

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

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

## **TARDAEWETHER Kellen \* ODOE**

---

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that 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.<sup>10</sup>  
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. <sup>11</sup>

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

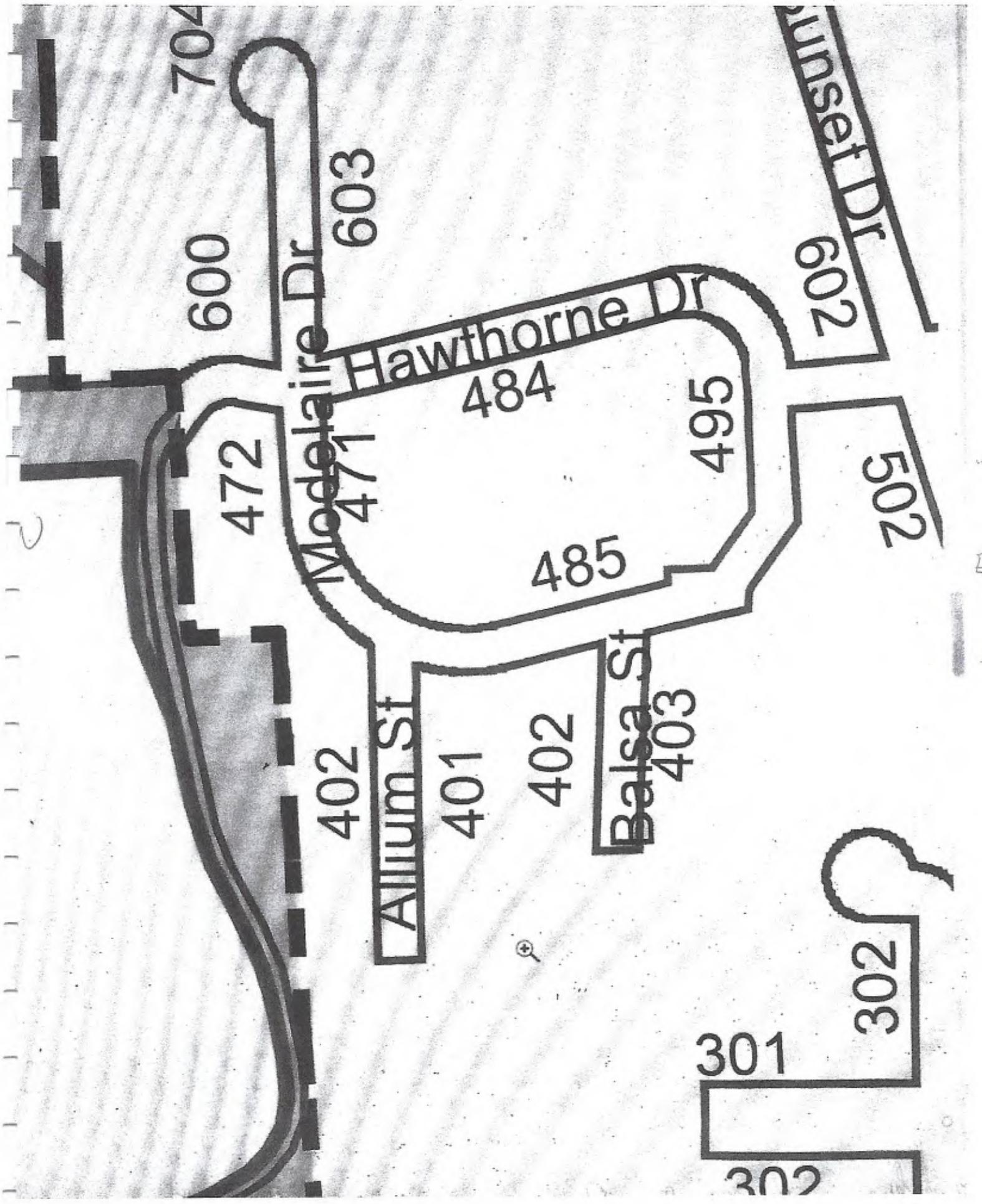
Sincerely,



Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

gmammen@eoni.com

N



### 3.3 Predicted Noise Levels

1 OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation  
2 of the proposed facility.  
3

#### 3.3.1 Construction Noise

##### 3.3.1.1 Predicted Construction Noise Levels

4 Project construction will occur sequentially, moving along the length of the Project route, or in  
5 other areas such as near access roads, structure sites, conductor pulling sites, and staging and  
6 maintenance areas. Overhead transmission line construction is typically completed in the  
7 following stages, but various construction activities may overlap, with multiple construction  
8 crews operating simultaneously:  
9

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

14 The following subsections discuss certain construction activities that will periodically generate  
15 audible noise, including blasting and rock breaking, implosive devices used during conductor  
16 stringing, helicopter operations, and vehicle traffic.  
17

#### **Blasting and Rock Breaking**

18 Blasting is a short-duration event as compared to rock removal methods, such as using track rig  
19 drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills.  
20 Modern blasting techniques include the electronically controlled ignition of multiple small-  
21 explosive charges in an area of rock that are delayed fractions of second, resulting in a total  
22 event duration that is generally less than a second. Impulse (instantaneous) noise from blasts  
23 could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.  
24

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

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

#### **Implosive Devices**

34 An implosive conductor splice consists of a split-second detonation with sound and flash.  
35 Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be  
36 developed by an individual certified and licensed to perform the work. The plan will  
37 communicate all safety and technical requirements including, but not limited to, delineation of  
38 the controlled access zone and distance away from residences.  
39

## 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](http://www.puc.state.or.us).

## Specific Standards for Wind Facilities

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

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

## Specific Standards for Transmission Lines

### OAR 345-024-0090

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



## Department of Environmental Quality

### Chapter 340

#### Division 35

#### NOISE CONTROL REGULATIONS

##### 340-035-0035

##### Noise Control Regulations for Industry and Commerce

###### (1) Standards and Regulations:

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

###### (b) New Noise Sources:

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

###### (B) New Sources Located on Previously Unused Site:

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

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

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

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

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

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

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

(3) Measurement:

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

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

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

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

(4) Monitoring and Reporting:

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

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

(A) Access to the site;

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

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

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

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

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

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

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

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

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

(g) Sounds that originate on construction sites.

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

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

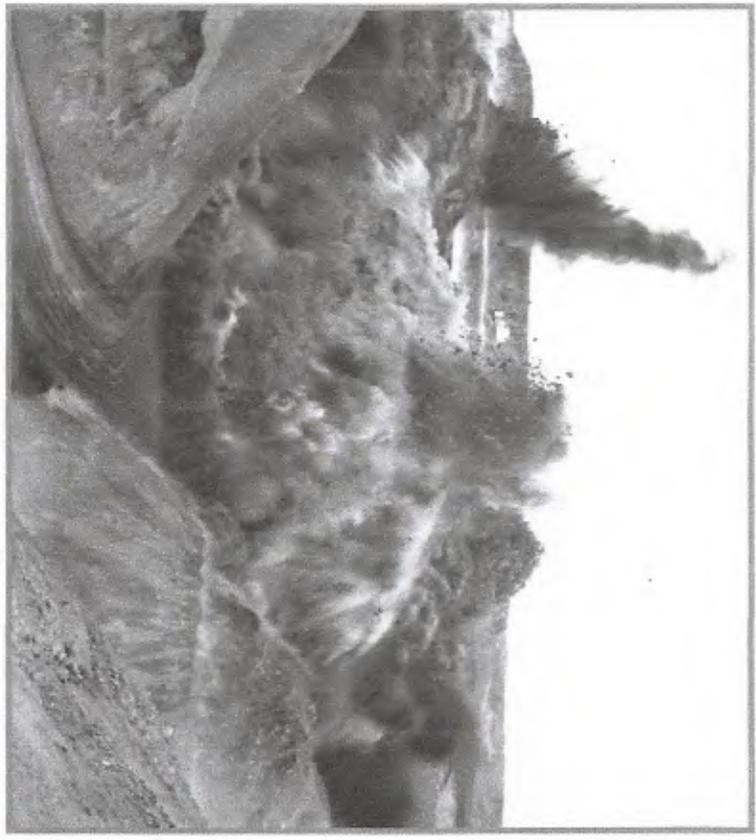
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal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

# Controlling the Adverse Effects of Blasting

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

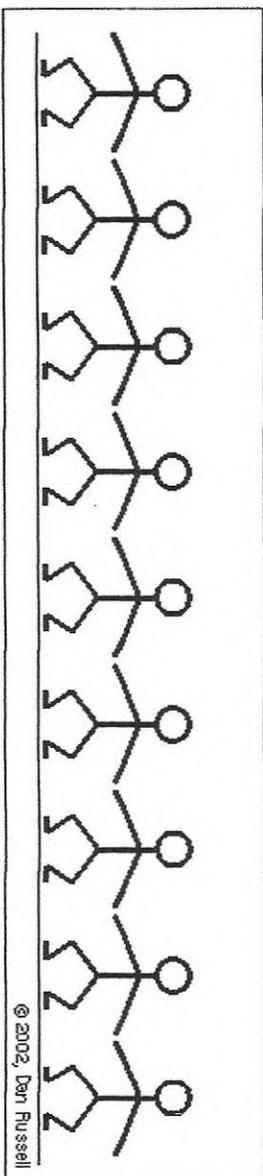
- vibrations,
- airblast, and
- flyrock.

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



## Part I: Ground Vibrations, Airblast, and Flyrock

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



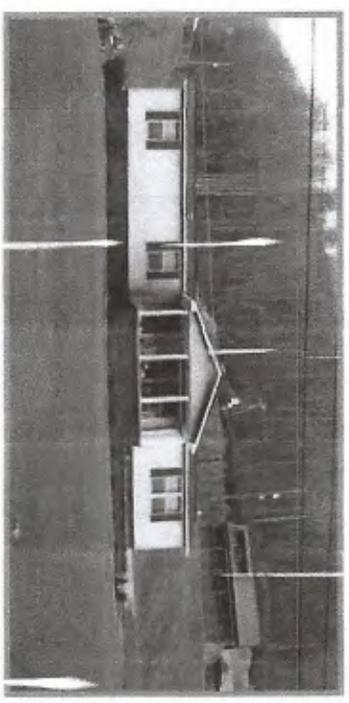
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

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

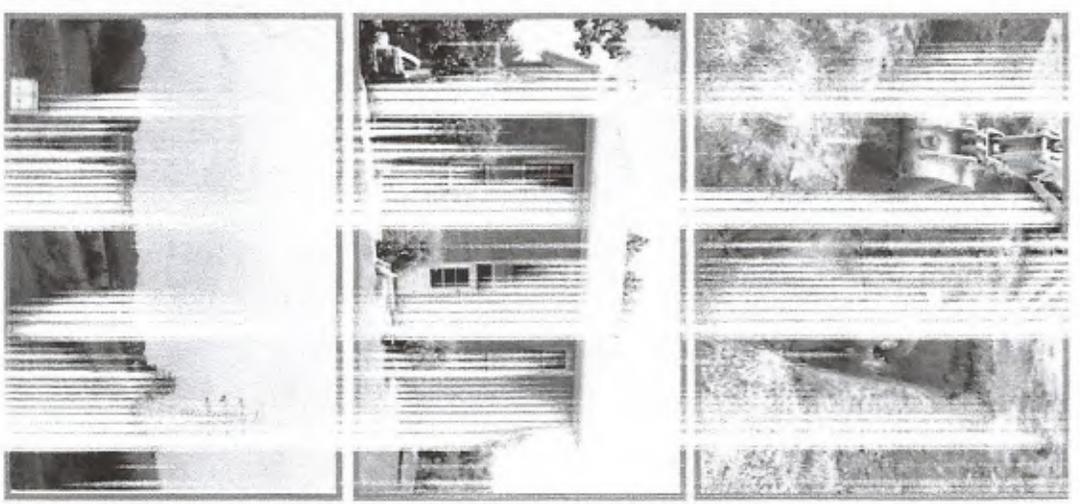
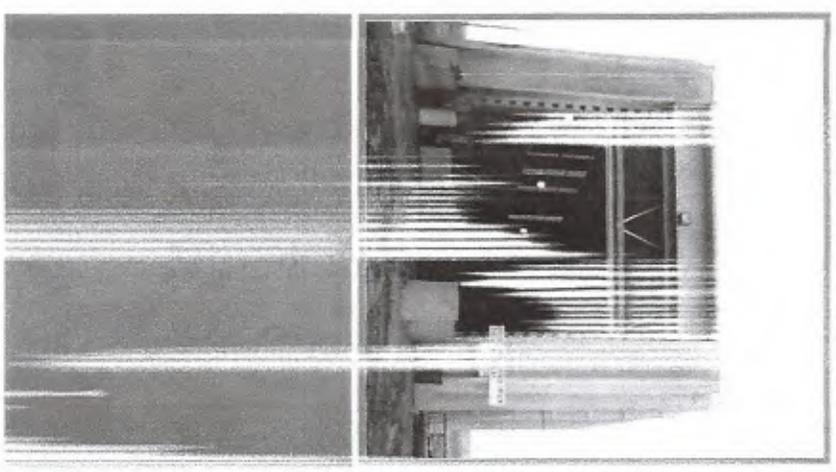
**Flyrock** is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.

# Blasting Impacts on Structures

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



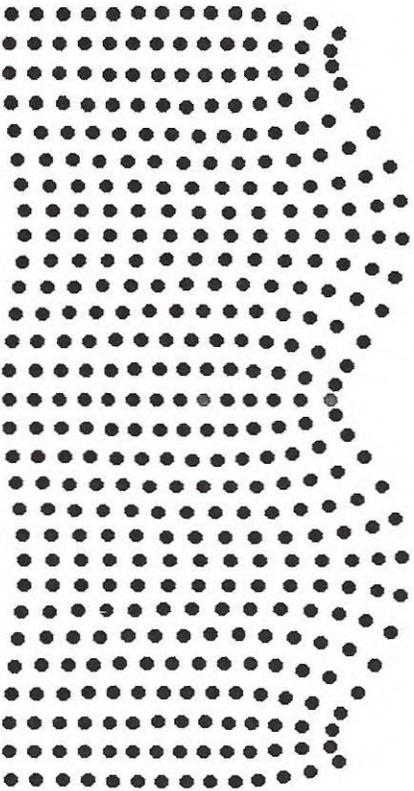
- It is important to understand:
1. the causes of ground vibrations and airblast, and
  2. what practices can be followed to control and minimize the adverse effects



## Ground Vibrations

---

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



©1999, Daniel A. Russell

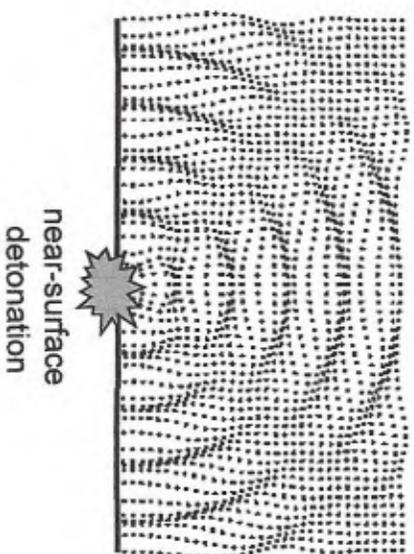
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

# Airblast

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

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



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

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

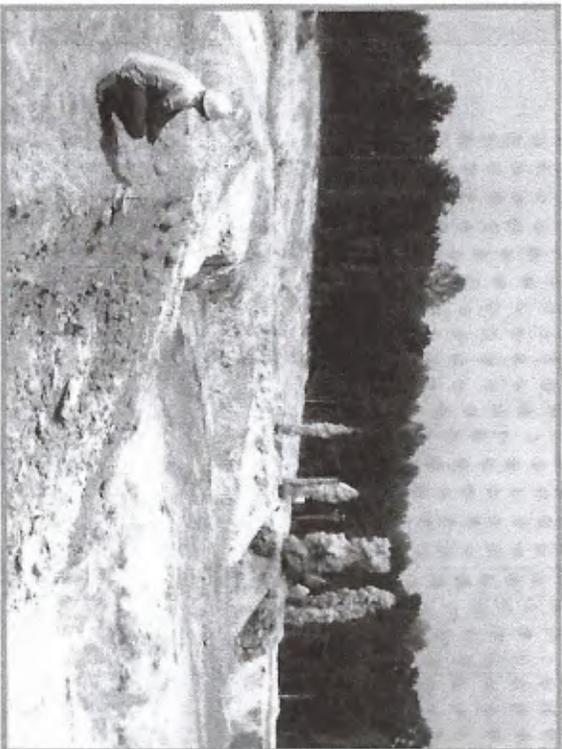


Exhibit 5

# Structure Response

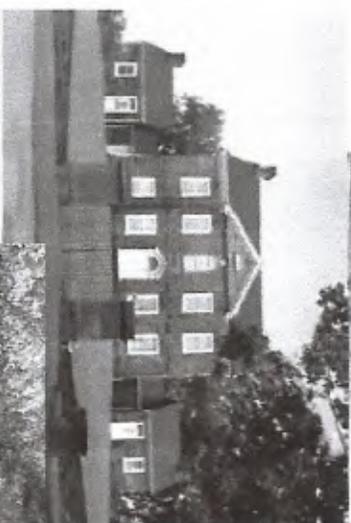
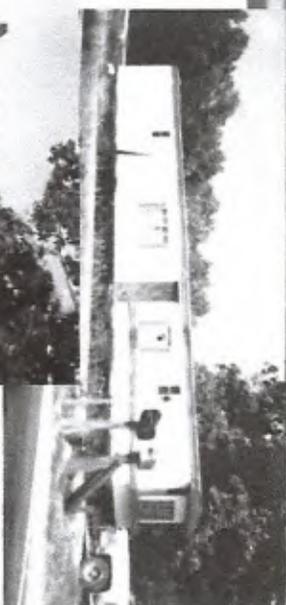
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

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

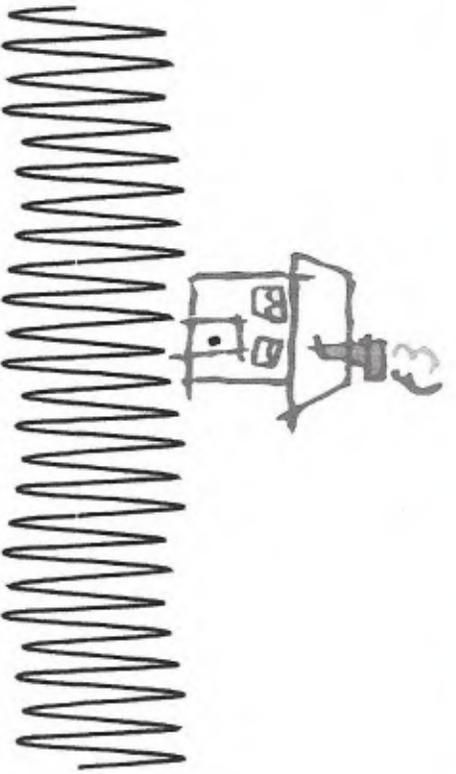
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

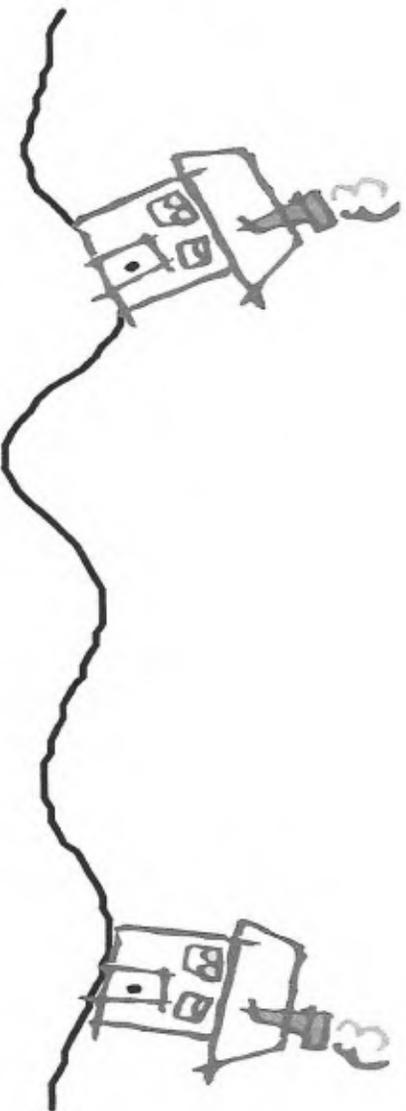


# Ground Vibration Structure Response

Exhibit 59



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.



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.



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*Harvard Men's Health Watch*

## A noisy problem

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

Published: March, 2019



Image: © Juanmonino/Getty Images

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

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

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

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Quiet in the Hospital: How Noise...

## Quiet in the Hospital: How Noise Reduction Helps Patients Heal

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

## References:

Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from [http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424\\_1\\_hospitals-neonatal-intensive-care-unit-noise](http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise)

Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>

Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

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## Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

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

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

### Symptoms

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

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

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



### Fear

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

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

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

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

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### Abstract

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

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

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

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

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

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

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

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

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

September 5, 2018

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



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

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

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

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

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

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

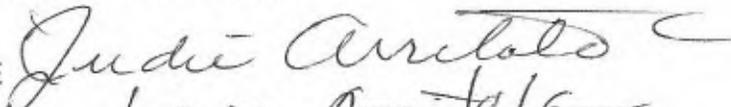
Where to begin?

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

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

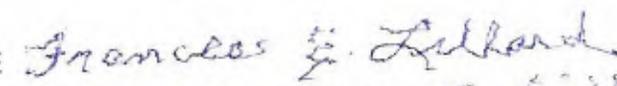


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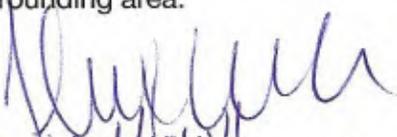
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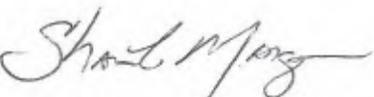
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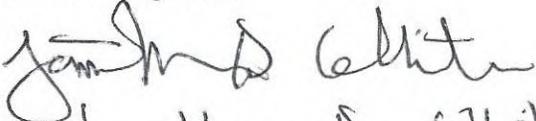
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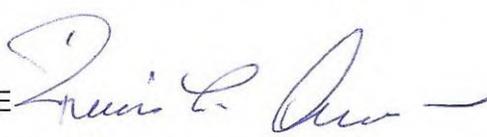
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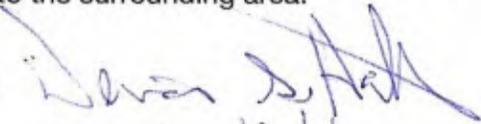
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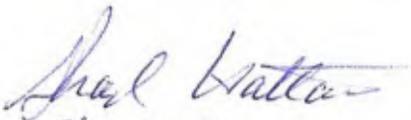
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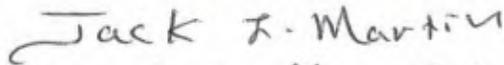
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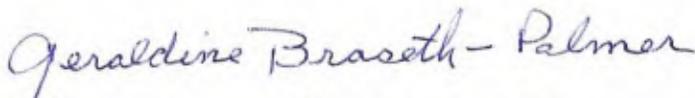
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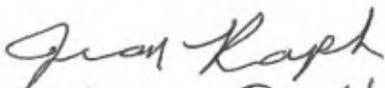
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to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

SIGNATURE

*Merle E Comfort*

PRINTED NAME

MERLE E COMFORT

ADDRESS

209 SWAPPO LA GRANDE OR 97850

EMAIL

merlecomfort@gmail.com

SIGNATURE

*Robin L. Maille*

PRINTED NAME

Robin Maille

ADDRESS

401 Cedar St., La Grande

EMAIL

rmaille@icloud.com

SIGNATURE

*Carol S. Summers*

PRINTED NAME

CAROL S. SUMMERS

ADDRESS

2811 Beketen Lane La Grande, OR.

EMAIL

carolsummers1938@gmail.com

SIGNATURE

*Caroline Kaye Juniper*

PRINTED NAME

Caroline Kaye Juniper

ADDRESS

406 4th Street - LaGrande - OR 97850

EMAIL

SIGNATURE

*Gerald D. Juniper*

PRINTED NAME

Gerald Darwin Juniper

ADDRESS

406 4th St. LaGrande, OR. 97850

EMAIL

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

SIGNATURE *Robert J. Sherer*  
PRINTED NAME Robert J. Sherer  
ADDRESS 970 Hawthorne Dr, La Grande, OR 97850  
EMAIL asherer@frontier.com.

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

SIGNATURE *Bert R. Freewing*  
PRINTED NAME Bert R. Freewing  
ADDRESS 709 South 12<sup>th</sup> Street La Grande, OR 97850  
EMAIL jeanfreewing@gmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

## TARDAEWETHER Kellen \* ODOE

---

**From:** Patricia Traffas <traffasp@gmail.com>  
**Sent:** Wednesday, June 19, 2019 8:13 AM  
**To:** B2H DPOComments \* ODOE; MStokes@idahopower.com; JMaffucio@idahopower.com; Gail Carbiener; Travis Boley  
**Subject:** B2H

Thank you for the opportunity to comment once again.

You have, on numerous occasions, received explicit and precise information from Mr. Gail Carbiener who represents the Oregon-California Trails Association. His expert work should be carefully considered.

As President of the Oregon-California Trails Association, I wish to comment once again regarding B2H. Our Association (OCTA) has a very detailed Strategic Plan calling for action on many fronts, and many projects. The Number One goal we have is "To Preserve, Protect, and Develop Trail Resources." There are precious Trail Resources which would suffer great adverse effects with the B2H Project.

Please consider the viewshed at the National Historic Oregon Trail Interpretive Center at Baker City. Here, any visitor has unobstructed views of the Oregon Trail. This experience is one of a kind at this particular site, and offers the viewer an exceptional opportunity. Proposed towers would obstruct this view as well as threaten on-the-ground trail resources and remnants. **Our mission is to advocate for the preservation and protection of both the viewshed and on-the-ground trail resources. I ask a question of you: "Would you want a similar transmission tower in YOUR backyard?" Well, we do not want a transmission tower in OUR backyard! If this transmission power line must go through, only an underground line would be the acceptable result.**

And there are other areas and trail resources which will be impacted by the BSH project. Because of the threats to trail resources, the Oregon-California Trails Association (OCTA) recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. The qualified Oregon Trail individual should have an undergraduate degree, with emphasis and specialty of anthropology, archaeology, or in the field of geology, engineering or history. This individual should be recommended by the National OCTA President and agreed to by B2H Field Director.

Please share this communication at the upcoming comment meetings. Thank you for the opportunity to comment on the B2H Draft Project Order.

Patricia Traffas,  
National OCTA President

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](mailto: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

G. Susanna Ogston  
Printed Name:

Mailing Address: G. Susanna Ogston  
96 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](mailto:B2H.DPOComments@Oregon.gov)

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DEPARTMENT OF ENERGY

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

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

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. 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.)

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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.

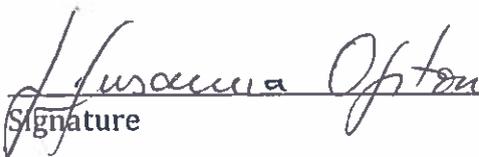
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming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

G. Susanna Ogston  
Printed Name

Mailing Address: G. Susanna Ogston  
96 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](mailto: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(1)(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 (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 applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

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

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

Sincerely,

  
Signature

Printed Name:

Mailing Address: G. Susanna Ogston  
96 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](mailto: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 8<sup>th</sup> 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](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: Susanna Ogston

Address: 96 3rd  
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](mailto:B2H.DPOComments@Oregon.gov)

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

To: Chairman Beyeler and Members of the Council

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

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

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

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

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

**ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:**

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

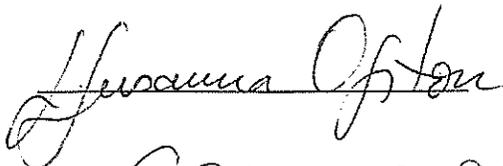
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire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

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

**ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:**

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

Sincerely,



Name: G. SUSANNA OGSTOV

Address: 96 THIRD 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](mailto: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.

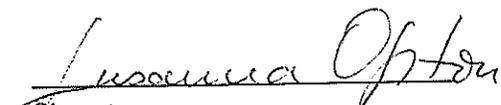
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means “the perimeter of the site of a proposed energy facility, it’s related 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: Susanna Ogston

Mailing Address:

96 Third St.  
La Grande, OR  
97850

## **TARDAEWETHER Kellen \* ODOE**

---

**From:** SHEERAN Kristen \* GOV  
**Sent:** Monday, July 22, 2019 11:49 AM  
**To:** B2H DPOComments \* ODOE  
**Cc:** BENNER Janine \* ODOE; CORNETT Todd \* ODOE  
**Subject:** Letter in Support of B2H Draft Order  
**Attachments:** B2H Letter.pdf

Dear Kellen,

Please add this letter to the official record of comments on ODOE's DPO on the proposed B2H project.

Sincerely,  
Kristen Sheeran

**Kristen Sheeran Ph.D.**

Energy and Climate Change Policy Advisor to Governor Kate Brown  
Director, Carbon Policy Office  
775 Court Street NE  
Salem, Oregon 97301  
[Kristen.Sheeran@oregon.gov](mailto:Kristen.Sheeran@oregon.gov)  
Cell: 971-240-0140  
Office: 503-378-5145

Assistant: Miles Palacios  
503-986-6543 (w)| [Austin.M.PALACIOS@oregon.gov](mailto:Austin.M.PALACIOS@oregon.gov)

**KATE BROWN**  
**GOVERNOR**



July 21, 2019

Barry Beyeler, Chair  
Energy Facility Siting Council  
Oregon Department of Energy  
550 Capitol St NE  
Salem, OR 97301

CC: Kellen Tardaewether, Senior Siting Analyst

Dear Chair Beyeler and members of the Energy Facility Siting Council,

On behalf of Governor Brown, I am pleased to submit this letter in support of the Oregon Department of Energy's Draft Proposed Order recommending EFSC approval of the proposed Boardman to Hemingway Transmission Line (B2H). Governor Brown appreciates Idaho Power's due diligence in acquiring permits and collecting feedback from constituents over the course of the last decade to determine the most beneficial route for this important transmission line.

To facilitate utilities' transition from coal and fossil fuel resources to meet our state and regional climate and clean energy goals, the West requires new and upgraded transmission capacity to integrate and balance intermittent resources like wind and solar. B2H can help balance renewable resources across the West and relieve congestion on existing transmission lines in Eastern Oregon through connections with larger transmission lines across the West. Electricity customers in Oregon and across the Pacific Northwest and Mountain West will benefit as a result. The project can deliver clean energy in the winter months to the Northwest and give the Northwest's utilities and independent energy generators a path to sell excess energy to Mountain West customers during the summer. For these reasons, B2H is a critically important investment in maintaining a robust electrical grid while integrating clean, renewable energy resources across the Pacific Northwest and Mountain West states.

The B2H project is also an important driver of economic activity in Eastern Oregon. By relieving transmission congestion, the B2H project can bring new economic opportunities related to wind and solar development to the region. The construction of the project can also create jobs and expand the tax base in Eastern Oregon.

For these reasons, Governor Brown supports the proposed B2H project as a benefit to electricity customers, businesses, and local governments in Oregon.

Thank you for your thoughtful consideration of this important project.

Kristen Sheeran, Energy and Climate Policy Advisor to Governor Kate Brown  
Office of Governor Kate Brown

**TARDAEWETHER Kellen \* ODOE**

---

**From:** Andrea fry <andrea@ibew125.com>  
**Sent:** Wednesday, June 19, 2019 8:32 AM  
**To:** B2H DPOComments \* ODOE  
**Subject:** OSAEW Letter to support Boardman to Hemingway Transmission Line  
**Attachments:** 20190612153819432.pdf

Hard copy to follow in the mail.

Thank you,

Andrea

IBEW Local 125

# Oregon State Association of Electrical Workers

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President  
IBEW Local 48  
15937 N.E. Airport Way  
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4480 Rogue Valley Hwy.  
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June 11, 2019

Mr. Barry Beyeler, Chair  
Energy Facility Siting Council  
200 City Center Circle  
Boardman, Oregon 97818

Dear Chair Beyeler:

On behalf of the Oregon State Association of Electrical Workers and its 14,390 members who work, we offer the follow comments in support of the Boardman to Hemingway Transmission Line.

All Oregonians benefit from a stable economy; reliable, safe, and low-cost energy is the foundation of that economy. Our members work in varying classifications in the electric industry, and they live throughout the Pacific Northwest. The B2H Project is necessary for the Northwest and Intermountain West regions to make certain the electricity that our state depends on will be available when we need it.

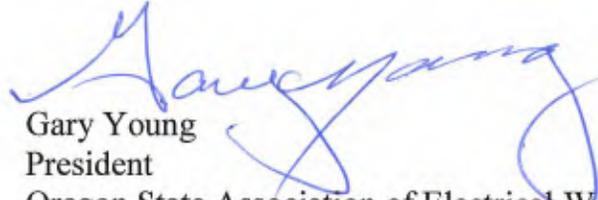
Oregonians have taken great pride in being a leader to shape discussion and policy on renewable energy. We have reduced carbon emissions while building renewable generation facilities, improving efficiency, and educating the public. No matter how well we do with reducing emissions, the need to have affordable, reliable, and safe power will not go away. The B2H Transmission Line is needed to ensure that occurs. To maximize the gains that have been made, the ability to transfer electricity between the Northwest and Intermountain West regions must be maximized.

There is no doubt that our members will have a direct benefit from the construction of this transmission line. We applaud the work that has been done by Idaho Power, Pacific Power, and Bonneville Power Administration to hear the public's concerns and propose a route that took environmental responsibility, cost, and efficiency into account. We know that a 500-kilovolt transmission line that is approximately 300 miles long will have a lasting impact beyond the construction phase, so this project is about more than immediate construction jobs to us.

B. Beyeler  
June 11, 2019  
Page 2

We respectfully offer our formal support of the B2H and hope that Oregon's Energy Facility Siting Council and appropriate federal agencies will issue their approval for the project. Please contact me if you have any questions about the OSAEW's position. Thank you for your consideration.

Sincerely,



Gary Young  
President  
Oregon State Association of Electrical Workers

# Oregon State Association of Electrical Workers

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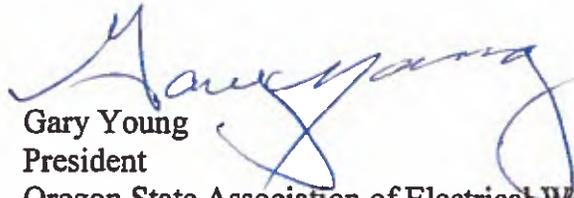
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B. Beyeler  
June 11, 2019  
Page 2

We respectfully offer our formal support of the B2H and hope that Oregon's Energy Facility Siting Council and appropriate federal agencies will issue their approval for the project. Please contact me if you have any questions about the OSAEW's position. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Young", is written over the typed name and title.

Gary Young  
President  
Oregon State Association of Electrical Workers

RECEIVED

JUL 10 2019

DEPARTMENT OF ENERGY

Verlyn D. Osborne  
former OCTA board member and Kansas House of Representatives, 61st. District  
1191 Granite Springs Rd. Lot 33  
Cheyenne, WY 82009

July 4, 2019

Oregon Department of Energy  
550 Capitol St. NE  
Salem, Oregon, 97301

RE: B2H Transmission Project public comments

There are two major issue that I am concerned with. The first issue is the fact that it has been stated that the Trail has been misrepresented on the maps. May I ask whose maps are we talking about. If its Idaho Power Company's maps, then I suggest that they be corrected by true Trail experts. The second issue is the statement made by the Idaho Power Company proposal that they will "try" to avoid damaging the Oregon Trail. We all know that once a Trail segment is damaged, it is impossible to repair that very important resource.

We all need to stand back and remember the long history of the Oregon Trail and how it has affected our country's history. OCTA has long attempted to protect this valuable resource and we challenge Idaho Power Company to join us in this preservation effort.

So, in this situation, we first need to make sure the maps are absolutely correct prior to any activity in the field and second is Idaho Power ready to spend the effort in conjunction with the Oregon-California Trail Association, in preserving our country's fantastic trail history? Finally, keep in mind, mediation is a process which is attempted after damage has occurred.

Sincerely,



Verlyn D. Osborne  
former OCTA board member and Kansas House of Representatives, 61st. District

## TARDAEWETHER Kellen \* ODOE

---

**From:** SEVERSON Joe \* OSMB  
**Sent:** Monday, July 22, 2019 1:37 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Boardman to Hemingway Transmission Line

Attn: Kellen Tardaewether  
Boardman to Hemingway Transmission Line Comments

Thank you for the opportunity to participate in the proposed Boardman to Hemingway Transmission Line project.

The Oregon State Marine Board (OSMB) is an advocate for recreational boating safety, navigation and access pursuant to Oregon Revised Statutes chapter 830 and Oregon Administrative Rules chapter 250. The Boating Facilities Program provides engineering services, technical assistance and grant funding for public recreational boating access facilities.

The Oregon State Marine Board comments are made in part based on a comprehensive review of the cumulative impact on recreational boating activities, public boating facilities, waterway rules, safety, conflict and congestion within the project area and potential impacts upstream or downstream.

The primary interests of the Oregon State Marine Board as they relate to recreational boating; include impacts to river navigation, construction timelines construction staging, in-water work, buoy placement, nighttime lighting, neighboring public boating facilities, placement of in-water structures, and placement of over-water structures.

Activities that would raise concern include: any staging of equipment at nearby boating facilities, any in-water work, any use of public boating facilities on or off the water, construction of infrastructure over boated waters, and changes in vertical and horizontal clearance that may impact river navigation and safety, among other activities planned that we may be unaware of.

Additionally, in-water construction activities have the potential to change or alter the geomorphology of the river; OSMB recommends a careful review for any impacts that may lead to scour, sedimentation or historical water elevations at any public boating facilities within or impacted by the Boardman to Hemingway Transmission Line.

OSMB recommends careful evaluation of activities that may impact boating facilities; including the historical and current recreational boating activities for safety, navigation. Given materials provided to OSMB and the current state in the planning process for the Boardman to Hemingway Transmission Line, OSMB is unable to fully ascertain direct or indirect impacts that may be of interest to OSMB. Therefore, the Oregon State Marine Board would like to remain informed on this planning process.

Thank you for this opportunity to comment and for including the Oregon State Marine Board in this planning process.

**Joe Severson, GISP**  
**Oregon State Marine Board**

Planning and GIS Coordinator  
Boating Facilities Program  
503.378.2629



SERVING OREGON'S BOATERS SINCE 1959.



## **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" <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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." <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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." <sup>5</sup>

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

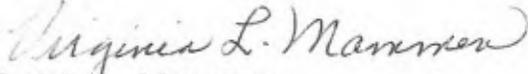
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

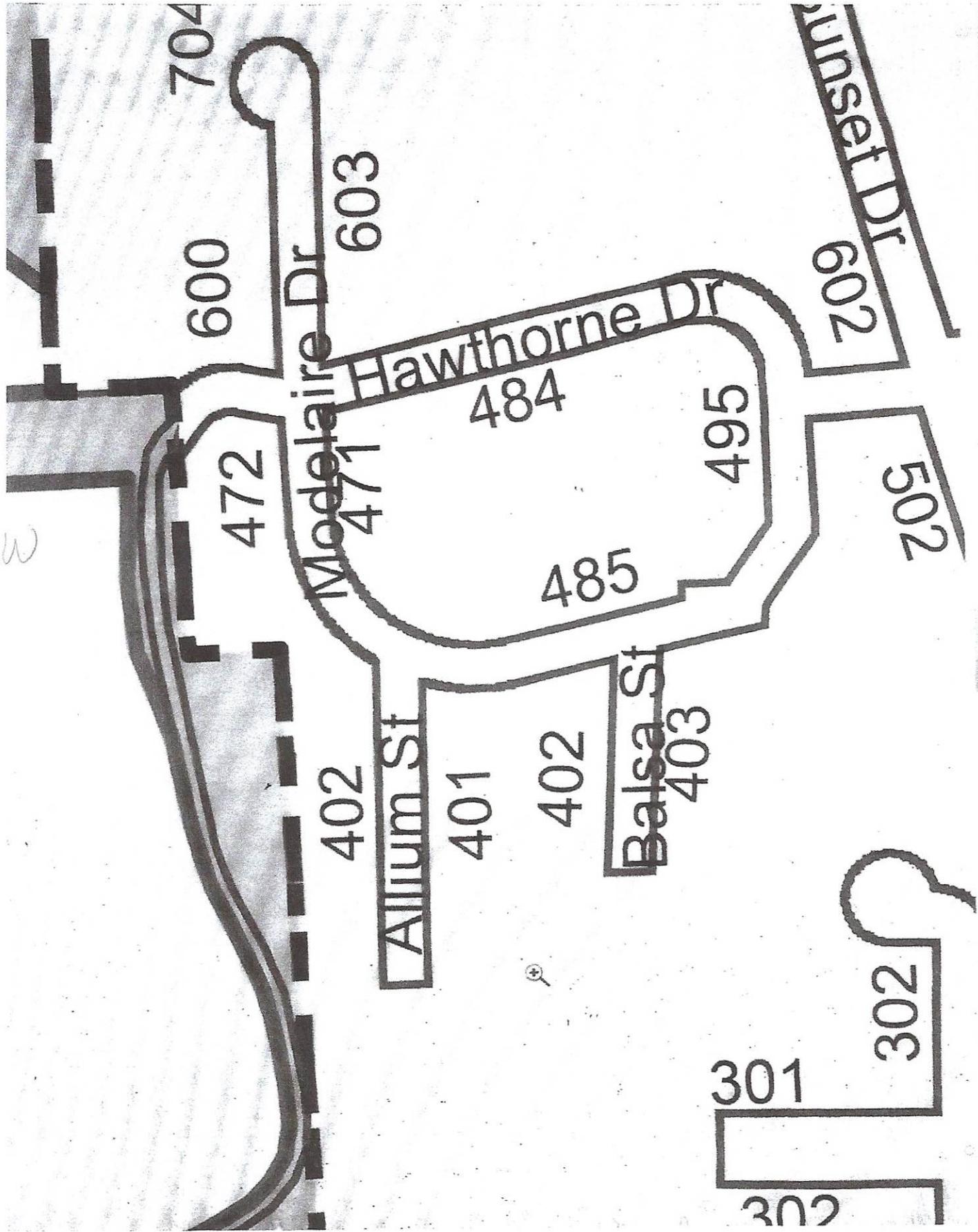
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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.

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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](http://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

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>proposed heliport is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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

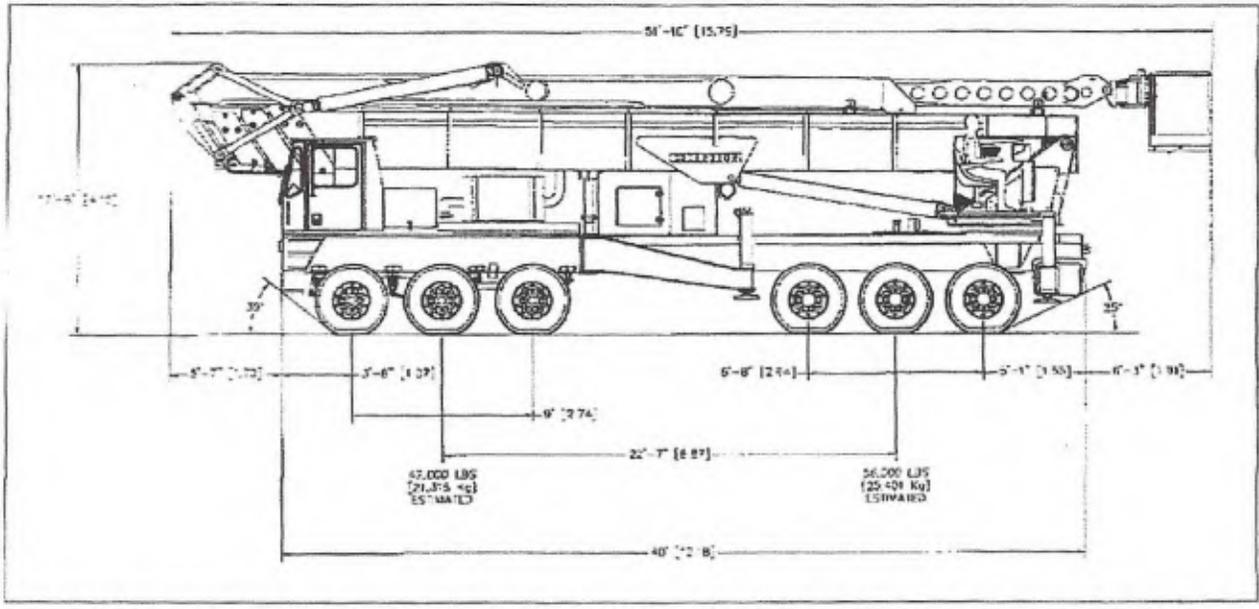


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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 tips 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
<b>Totals</b>	—	—	<b>620</b>	—	—	<b>188</b>

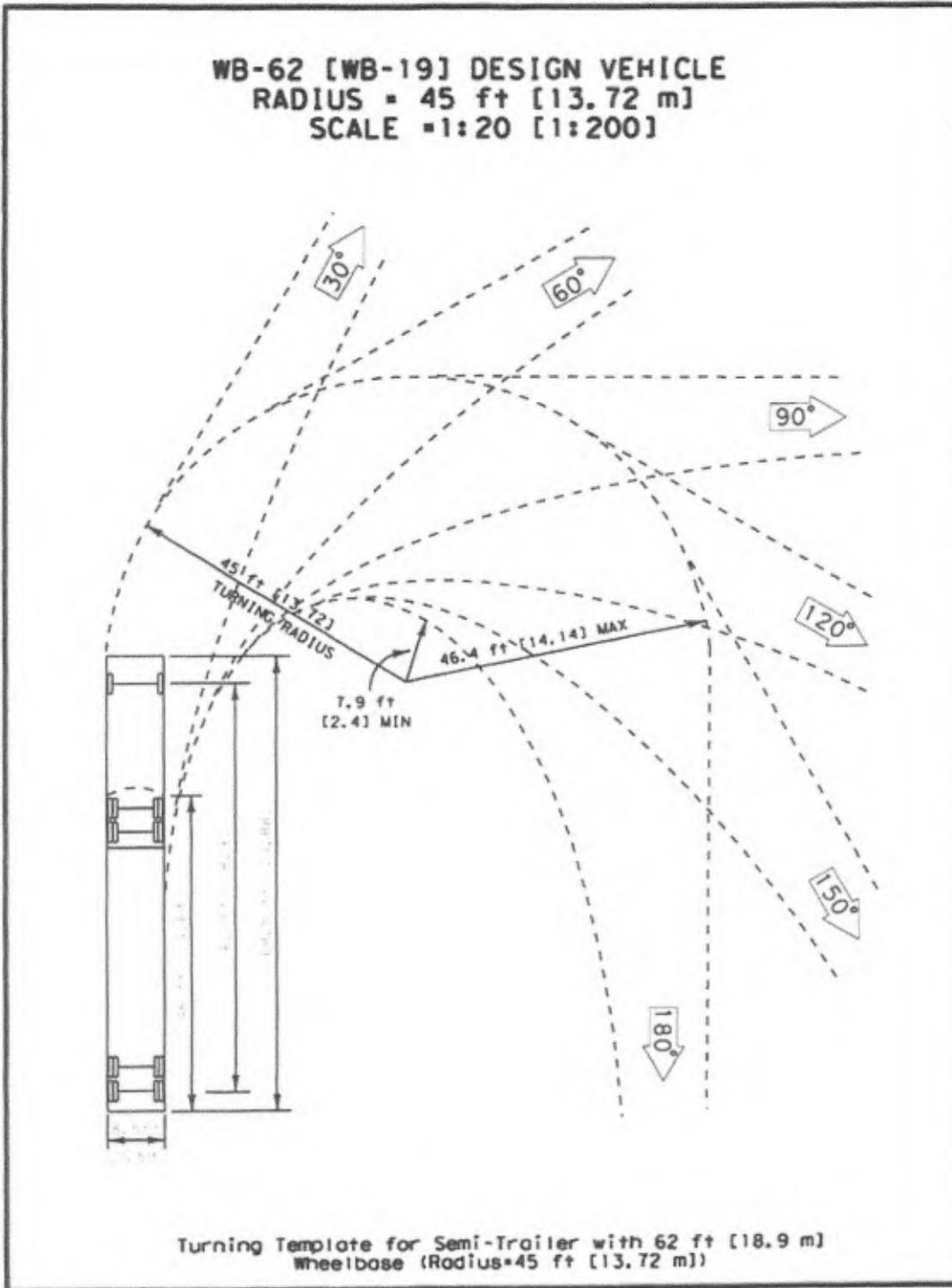


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

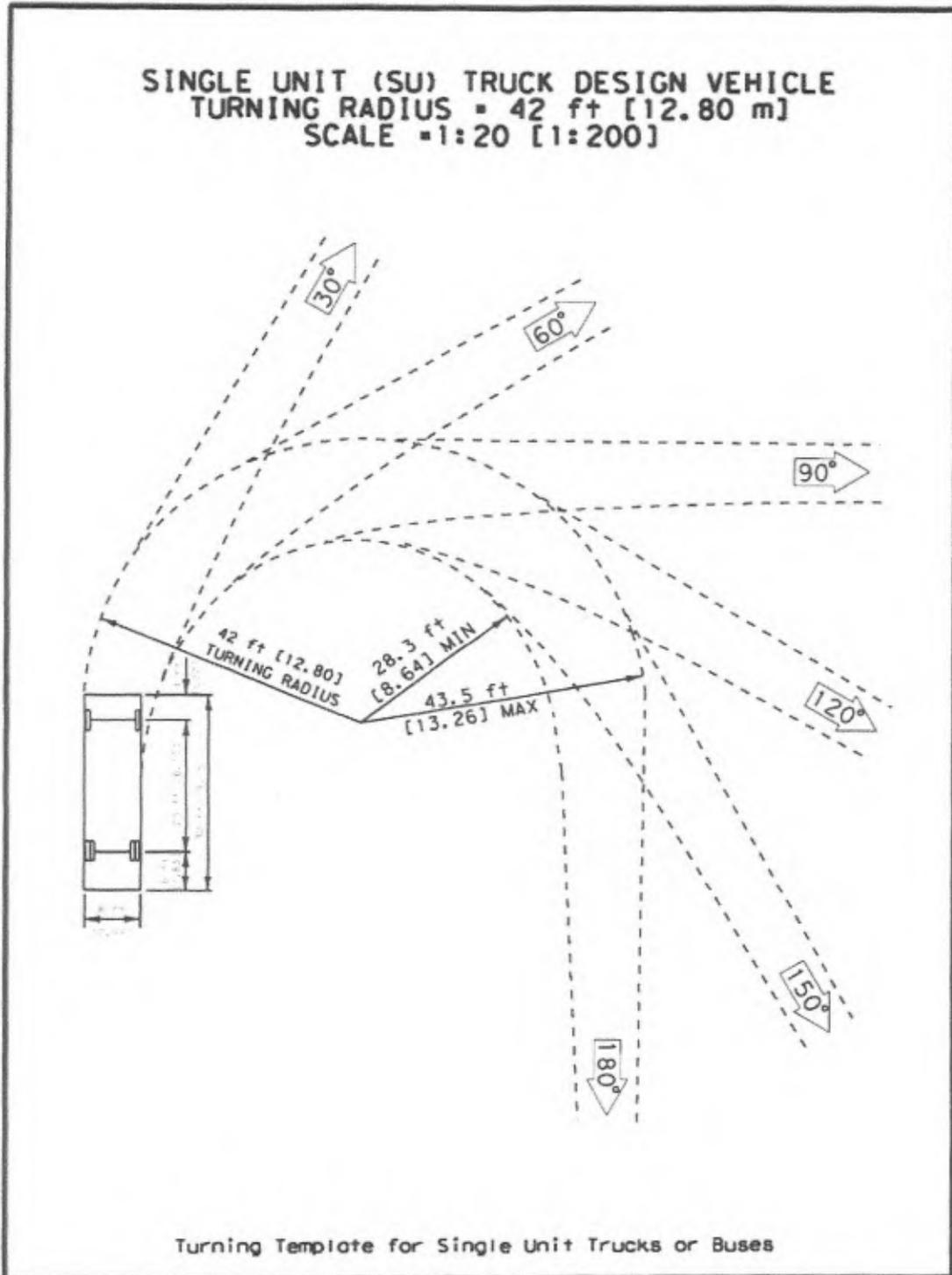


Exhibit 15

**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.

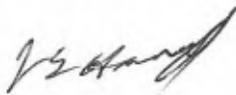
**Section 17. TRUCK ROUTES**

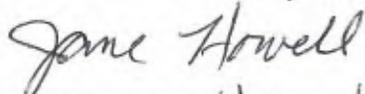
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

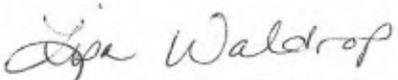
**Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES**

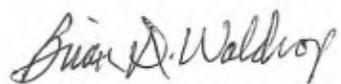
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

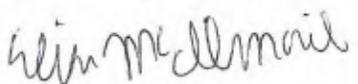
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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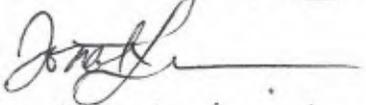
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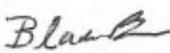
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SIGNATURE   
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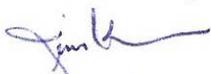
SIGNATURE   
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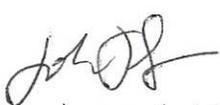
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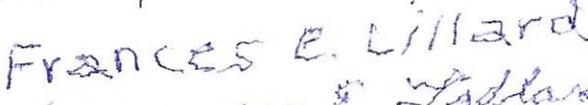
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EMAIL

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SIGNATURE   
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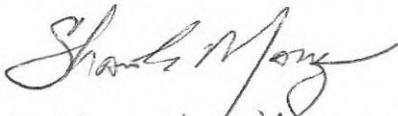
SIGNATURE   
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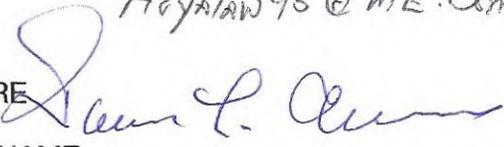
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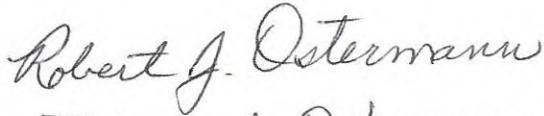
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I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community 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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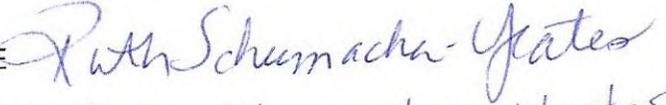
SIGNATURE   
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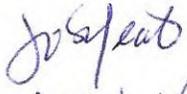
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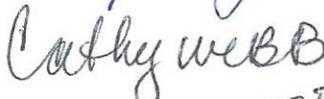
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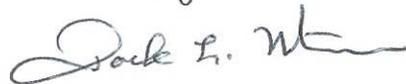
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EMAIL thunkski@gmail.com

SIGNATURE   
PRINTED NAME Jack L. Martin  
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EMAIL Buff Martin 27 @GMail .com

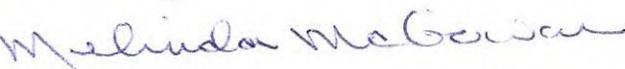
SIGNATURE   
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ADDRESS 1509 MADISON AVE LaGrande, OR 97850  
EMAIL Jraph19@gmail.com

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

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

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

SIGNATURE   
PRINTED NAME Melinda McGowan  
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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  
EMAIL rlwd1910@gmail.com

SIGNATURE *Anne G. Cavinato*  
PRINTED NAME Anne G. Cavinato  
ADDRESS 86 Hawthorne Dr. La Grande, OR 97850  
EMAIL acavinat@eou.edu

SIGNATURE *Joe Horst*  
PRINTED NAME JOE HORST  
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR.  
EMAIL joehorst@eoni.com

SIGNATURE *Angela Sherer*  
PRINTED NAME ANGELA Sherer  
ADDRESS 91 W. Hawthorne Dr. La Grande, OR 97850  
EMAIL asherer@frontier.com

I have read the attached letter regarding 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 12<sup>th</sup> 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 carolsummers1935@gmail.com

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

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

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

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

## TARDAEWETHER Kellen \* ODOE

---

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that 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.<sup>10</sup>  
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. <sup>11</sup>

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

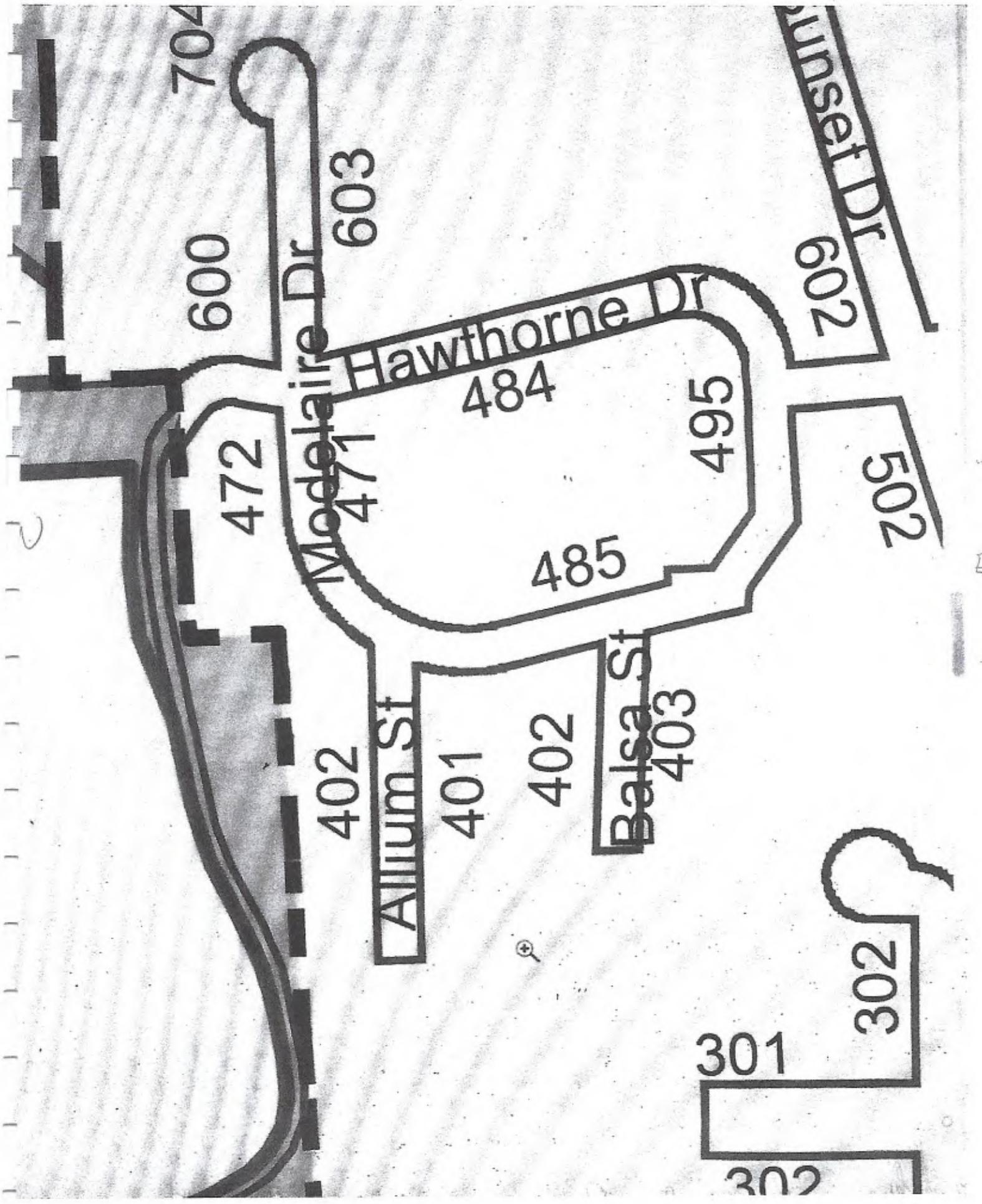
Sincerely,



Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

gmammen@eoni.com

N



### 3.3 Predicted Noise Levels

1 OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation  
2 of the proposed facility.  
3

#### 3.3.1 Construction Noise

##### 3.3.1.1 Predicted Construction Noise Levels

4 Project construction will occur sequentially, moving along the length of the Project route, or in  
5 other areas such as near access roads, structure sites, conductor pulling sites, and staging and  
6 maintenance areas. Overhead transmission line construction is typically completed in the  
7 following stages, but various construction activities may overlap, with multiple construction  
8 crews operating simultaneously:  
9

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

14 The following subsections discuss certain construction activities that will periodically generate  
15 audible noise, including blasting and rock breaking, implosive devices used during conductor  
16 stringing, helicopter operations, and vehicle traffic.  
17

##### **Blasting and Rock Breaking**

18 Blasting is a short-duration event as compared to rock removal methods, such as using track rig  
19 drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills.  
20 Modern blasting techniques include the electronically controlled ignition of multiple small-  
21 explosive charges in an area of rock that are delayed fractions of second, resulting in a total  
22 event duration that is generally less than a second. Impulse (instantaneous) noise from blasts  
23 could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.  
24

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

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

##### **Implosive Devices**

34 An implosive conductor splice consists of a split-second detonation with sound and flash.  
35 Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be  
36 developed by an individual certified and licensed to perform the work. The plan will  
37 communicate all safety and technical requirements including, but not limited to, delineation of  
38 the controlled access zone and distance away from residences.  
39

**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](http://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.



# Department of Environmental Quality

## Chapter 340

### Division 35

#### NOISE CONTROL REGULATIONS

##### 340-035-0035

##### Noise Control Regulations for Industry and Commerce

###### (1) Standards and Regulations:

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

###### (b) New Noise Sources:

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

###### (B) New Sources Located on Previously Unused Site:

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

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

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

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

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

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

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

(3) Measurement:

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

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

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

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

(4) Monitoring and Reporting:

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

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

(A) Access to the site;

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

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

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

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

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

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

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

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

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

(g) Sounds that originate on construction sites.

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

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

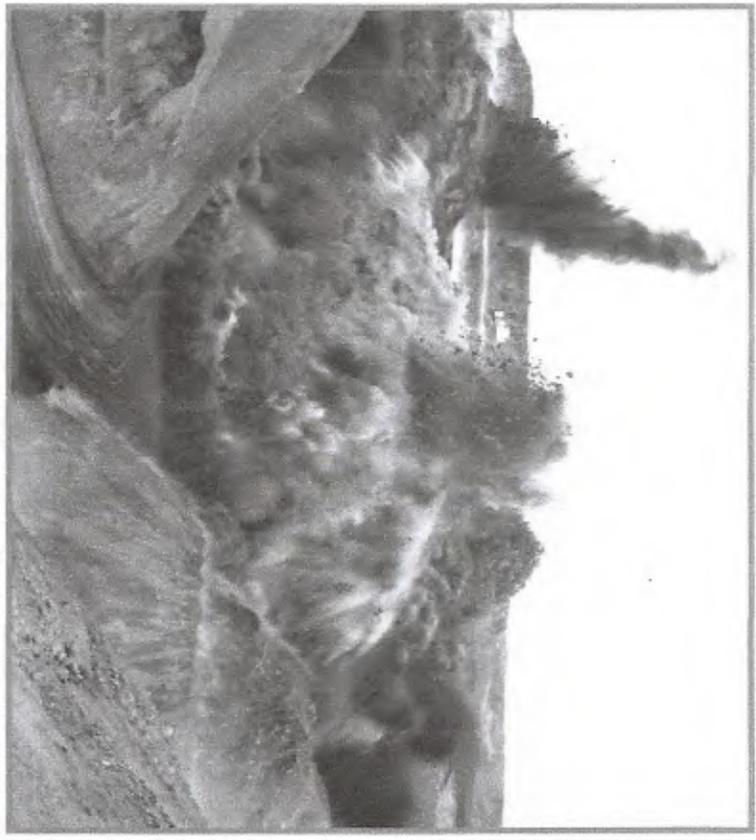
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal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

# Controlling the Adverse Effects of Blasting

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

- vibrations,
- airblast, and
- flyrock.

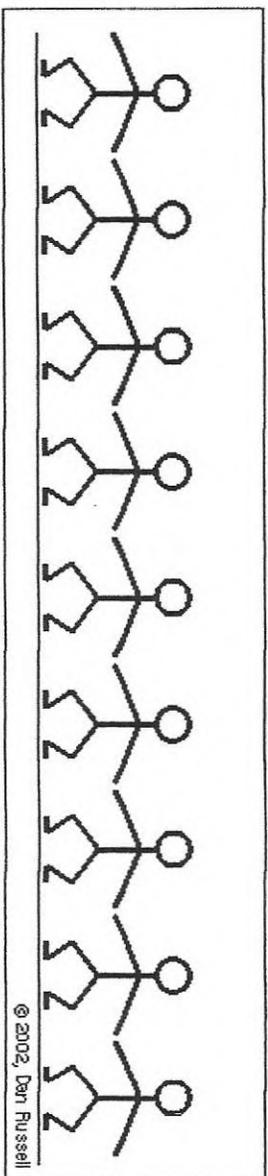
Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying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



## Part I: Ground Vibrations, Airblast, and Flyrock

Exhibit 5b

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



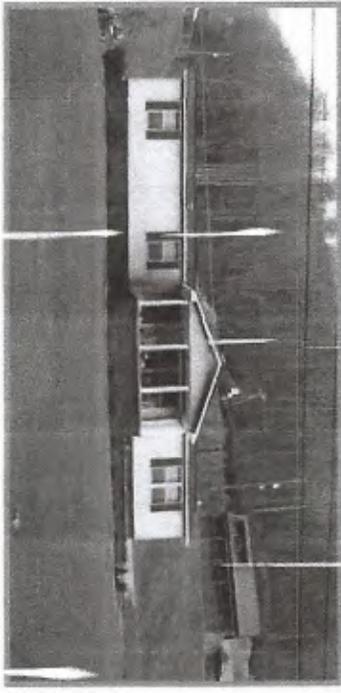
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

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

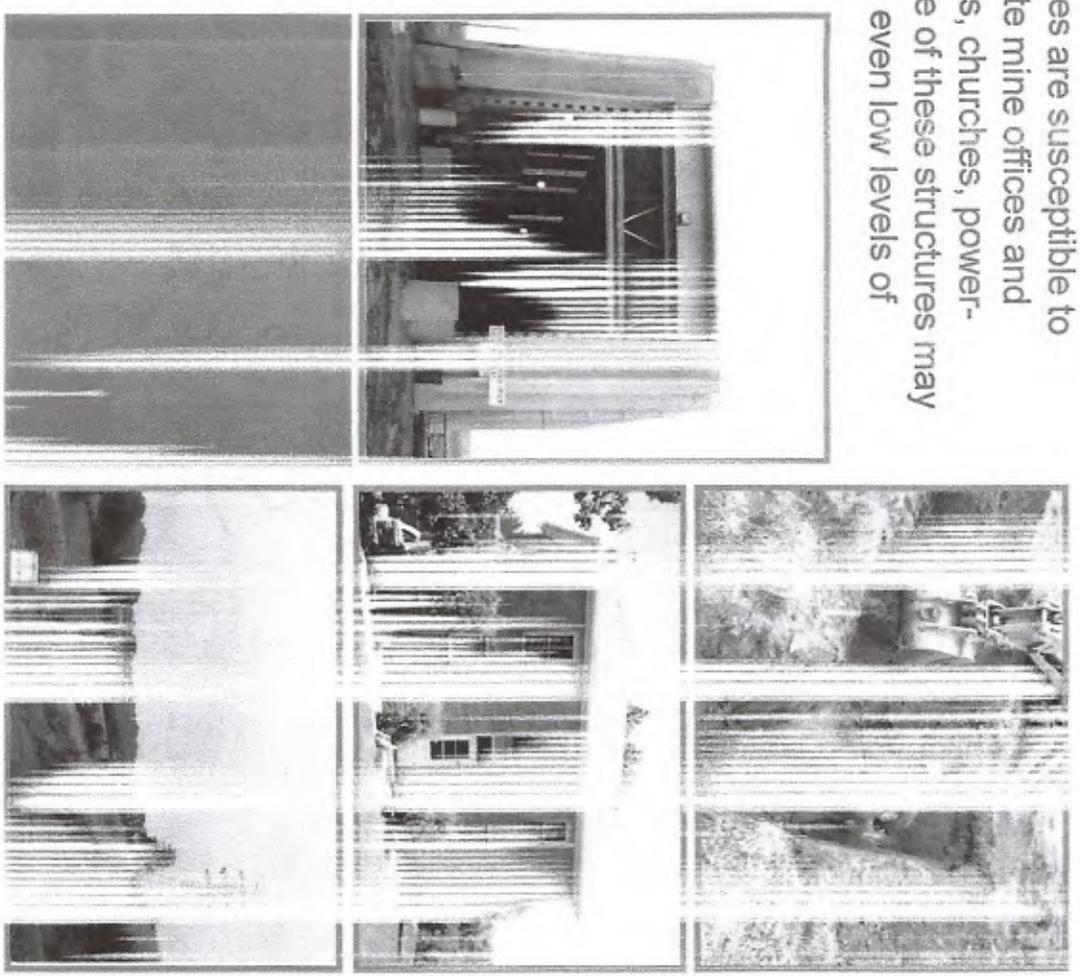
**Flyrock** is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.

# Blasting Impacts on Structures

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



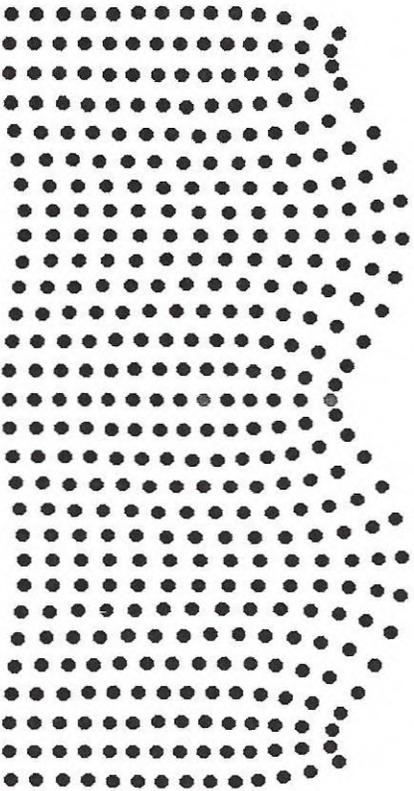
- It is important to understand:
1. the causes of ground vibrations and airblast, and
  2. what practices can be followed to control and minimize the adverse effects



## Ground Vibrations

---

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



©1999, Daniel A. Russell

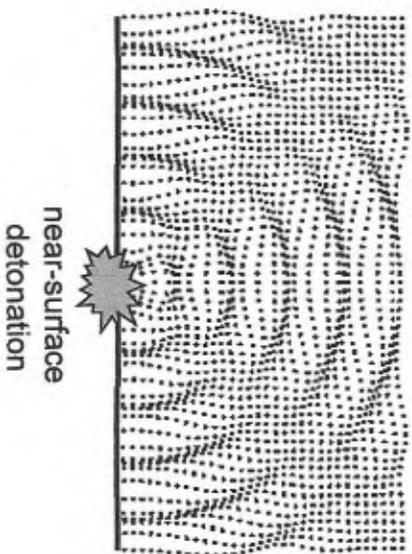
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

# Airblast

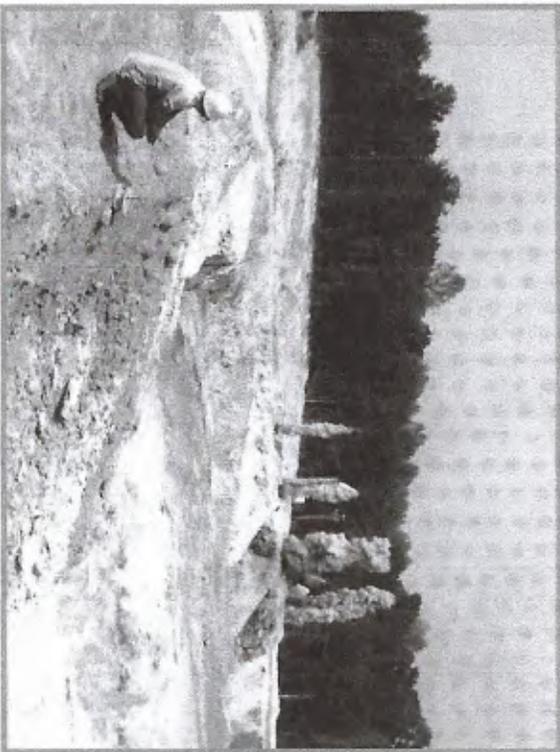
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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



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

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



# Structure Response

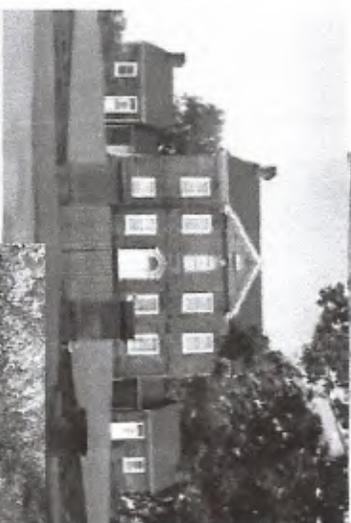
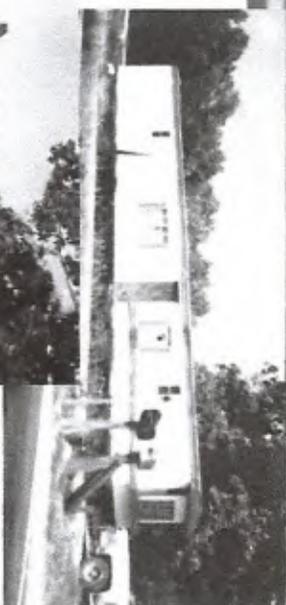
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

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

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

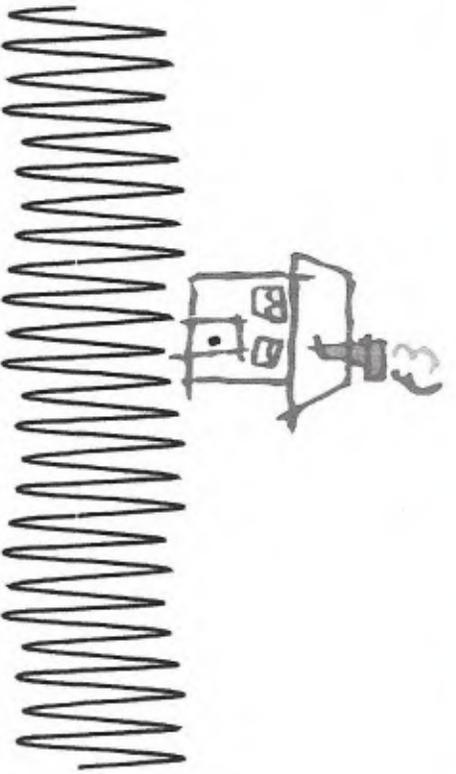
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

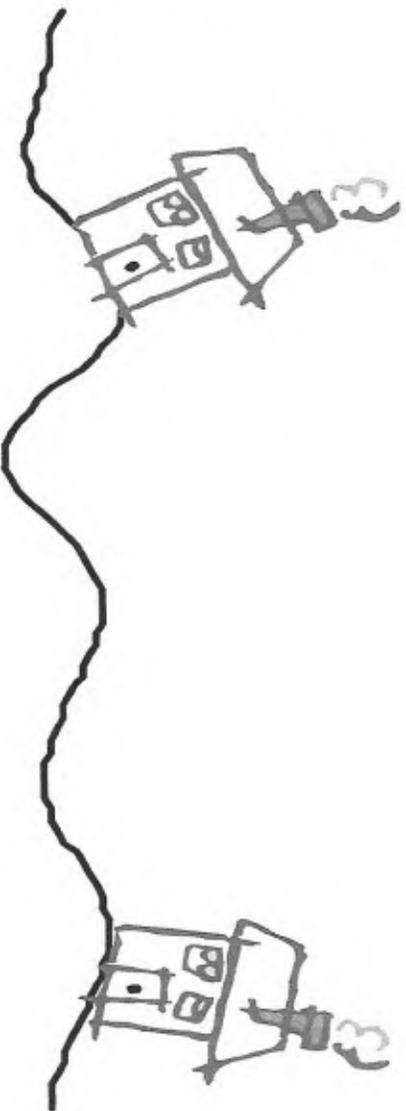


# Ground Vibration Structure Response

Exhibit 59



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.



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.



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*Harvard Men's Health Watch*

## A noisy problem

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

Published: March, 2019



Image: © Juanmonino/Getty Images

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

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

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

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Quiet in the Hospital: How Noise...

## Quiet in the Hospital: How Noise Reduction Helps Patients Heal

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

## References:

Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from [http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424\\_1\\_hospitals-neonatal-intensive-care-unit-noise](http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise)

Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>

Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

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## Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

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

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

### Symptoms

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

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

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



### Fear

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

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

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

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

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### Abstract

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

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

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

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

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

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

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

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

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

September 5, 2018

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



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

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

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

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

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

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

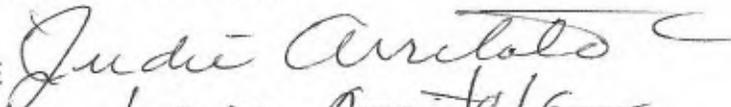
Where to begin?

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

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

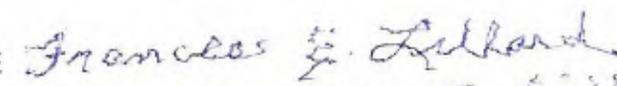


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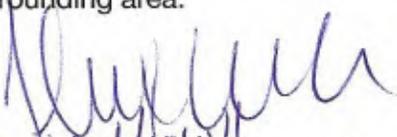
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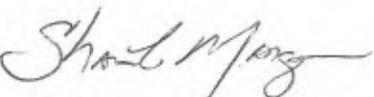
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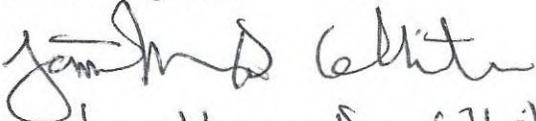
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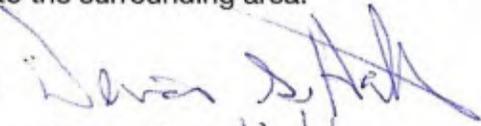
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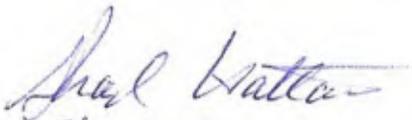


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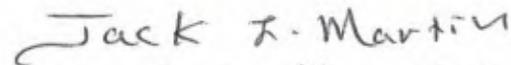


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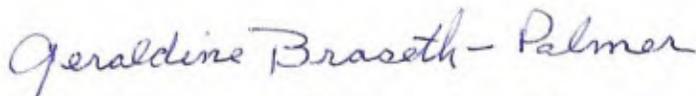


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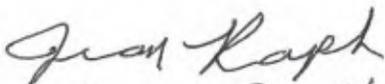
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ADDRESS  
EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

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

SIGNATURE *Lois Barry*  
PRINTED NAME LOIS BARRY  
ADDRESS P.O. Box 566, LA GRANDE, OR 97850  
EMAIL loisbarry31@gmail.com

SIGNATURE *Cathy Webb*  
PRINTED NAME CATHY WEBB  
ADDRESS 1700 Cedar St. LA GRANDE, OR 97850  
EMAIL thinkski@gmail.com

SIGNATURE *JoAnn Marlette*  
PRINTED NAME JOANN MARLETTE  
ADDRESS 2031 Court St. #8, Baker City, OR 97814  
EMAIL joannmarlette@yahoo.com

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

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

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

SIGNATURE *Lynn Wheeler Duncan*  
PRINTED NAME LYNN WHEELER DUNCAN  
ADDRESS 489 Modelaire Drive, LaGrande OR 97850  
EMAIL ylw1910@gmail.com

SIGNATURE *Gary D. Pierson*  
PRINTED NAME Gary D. Pierson  
ADDRESS 489 Modelaire Drive, La Grande OR 97850  
EMAIL -

SIGNATURE *Anne G. Cavinto*  
PRINTED NAME Anne G. Cavinto  
ADDRESS 86 Hawthorne Dr. La Grande OR 97850  
EMAIL acavinet@ecu.edu

SIGNATURE *Joe Horst*  
PRINTED NAME JOE HORST  
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR 97850  
EMAIL joehorst@con.com

SIGNATURE *Angela Sherer*  
PRINTED NAME Angela Sherer  
ADDRESS 91 W. Hawthorne Dr La Grande, OR 97850  
EMAIL asherer@frontier.com

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

SIGNATURE

*Merle E Comfort*

PRINTED NAME

MERLE E COMFORT

ADDRESS

209 SWANIO LA GRANDE OR 97850

EMAIL

merlecomfort@gmail.com

SIGNATURE

*Robin L. Maille*

PRINTED NAME

Robin Maille

ADDRESS

401 Cedar St., La Grande

EMAIL

rmaille@icloud.com

SIGNATURE

*Carol S. Summers*

PRINTED NAME

CAROL S. SUMMERS

ADDRESS

2811 Beketen Lane La Grande, OR.

EMAIL

carolsummers1938@gmail.com

SIGNATURE

*Caroline Kaye Juniper*

PRINTED NAME

Caroline Kaye Juniper

ADDRESS

406 4th Street - La Grande - OR 97850

EMAIL

SIGNATURE

*Gerald D. Juniper*

PRINTED NAME

Gerald Darwin Juniper

ADDRESS

406 4th St. La Grande, OR. 97850

EMAIL

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

SIGNATURE *Robert J. Sherer*  
PRINTED NAME Robert J. Sherer  
ADDRESS 970 Hawthorne Dr, La Grande, OR 97850  
EMAIL asherer@frontier.com.

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

SIGNATURE *Bert R. Freewing*  
PRINTED NAME Bert R. Freewing  
ADDRESS 709 South 12<sup>th</sup> Street La Grande, OR 97850  
EMAIL jeanfreewing@gmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

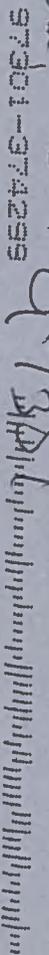
1112 1/2 Adams Ave  
La Grande, OR 97850

POSTMARKED ON SIZE  
17 AUG 2019 PM 4 E



Energy Facility Siting Counsel  
Attn: V. Tardeweth  
Oregon Dept. of Energy  
550 Capitol St., NE  
Salem OR 97301-374299

**RECEIVED**  
AUG 19 2019  
DEPARTMENT OF ENERGY



August 14, 2019

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

Via E-MAIL: [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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

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

- b. It is the single most visited tourist facility in Baker County
  - c. The quality of the facility is outstanding
  - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

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

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

Thank you,

  
Signature

Printed Name: Robert J. Ostermann

Mailing Address: 495 Modelaire Dr.  
La Grande OR 97850

Email: robooster5@gmail.com

## **TARDAEWETHER Kellen \* ODOE**

---

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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." <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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." <sup>5</sup>

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

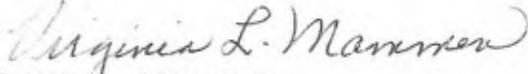
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

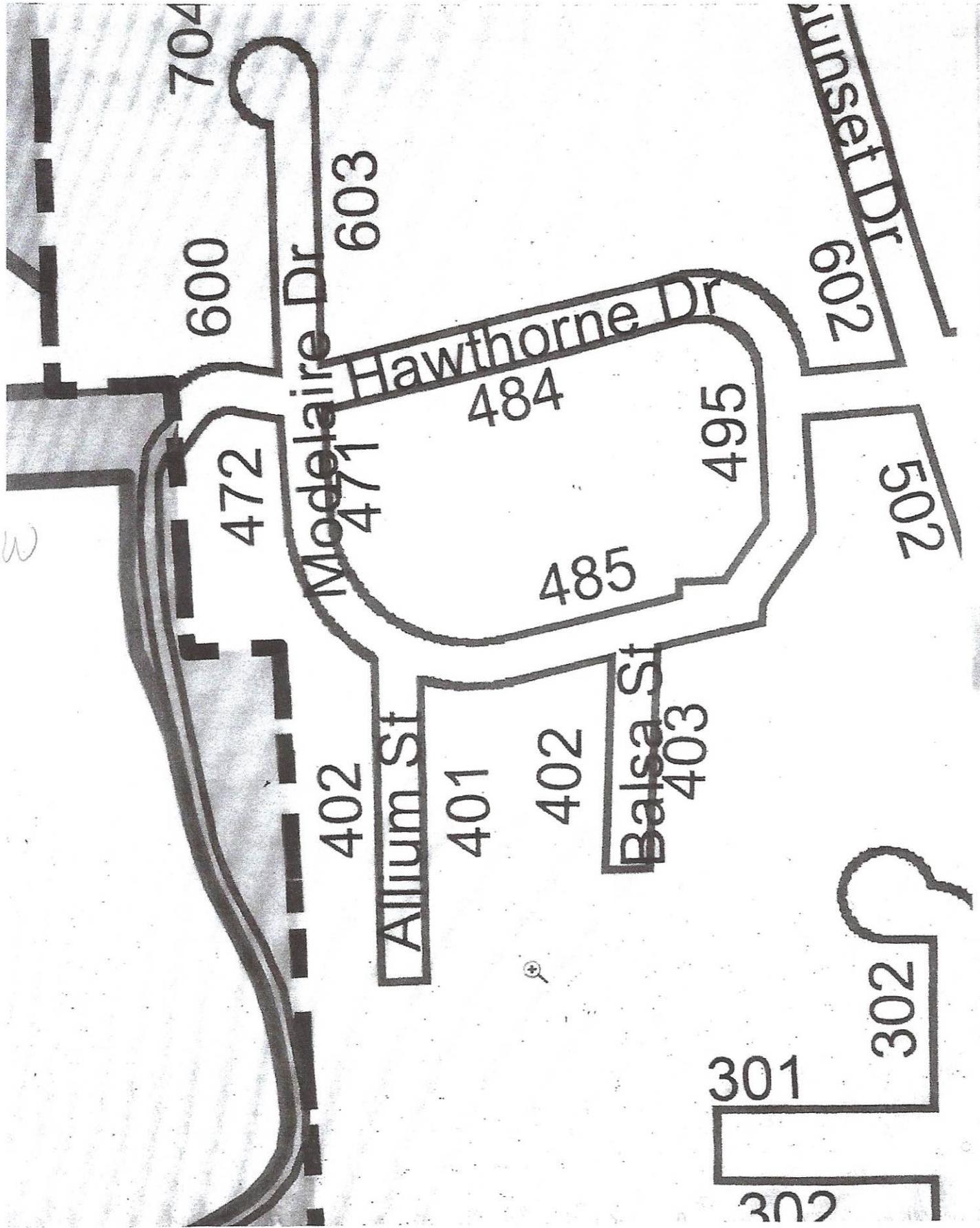
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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.

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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](http://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

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>proposed heliport is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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.

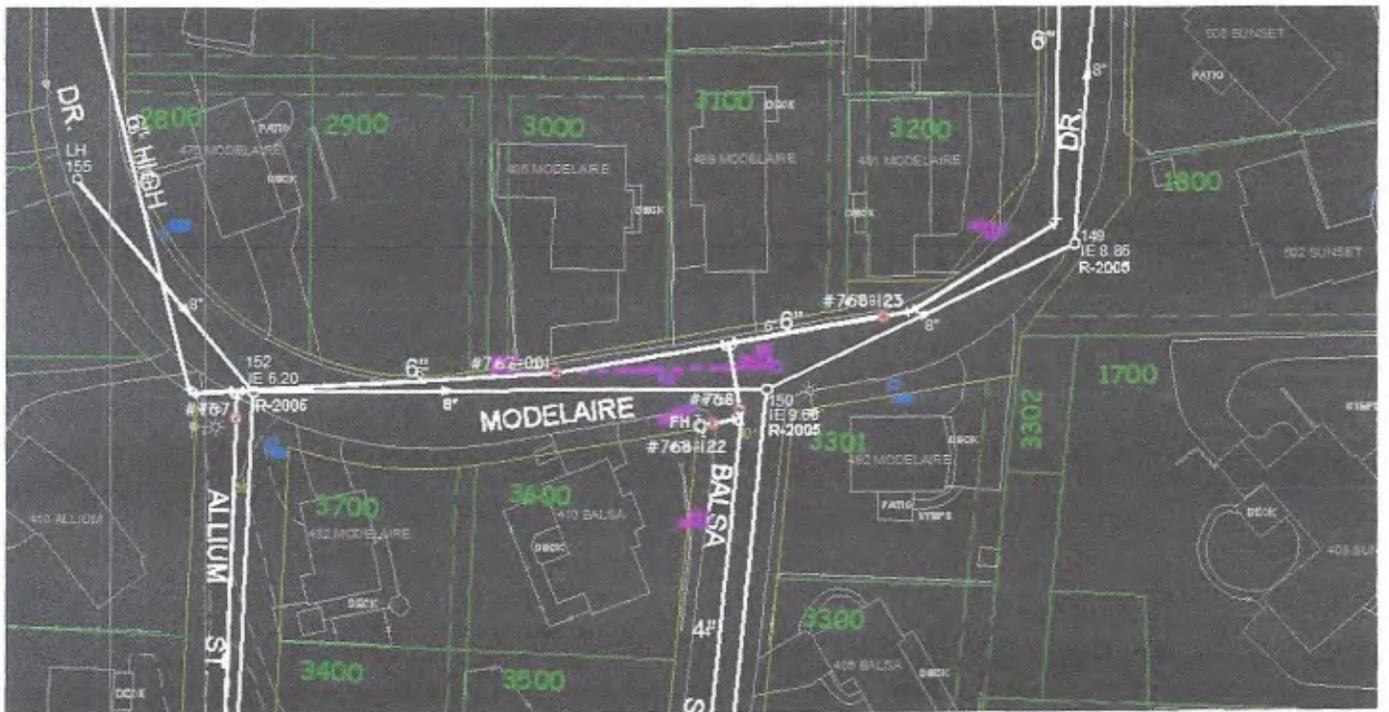
*Kyle Carpenter, PE*  
**Public Works Director**  
**City of La Grande**  
**Public Works**  
 Ph: (541) 962-1325  
 Fax: (541) 963-4844

2 attachments



Hawthorne.jpg  
150K

Modelaire.jpg  
120K





attachment U2

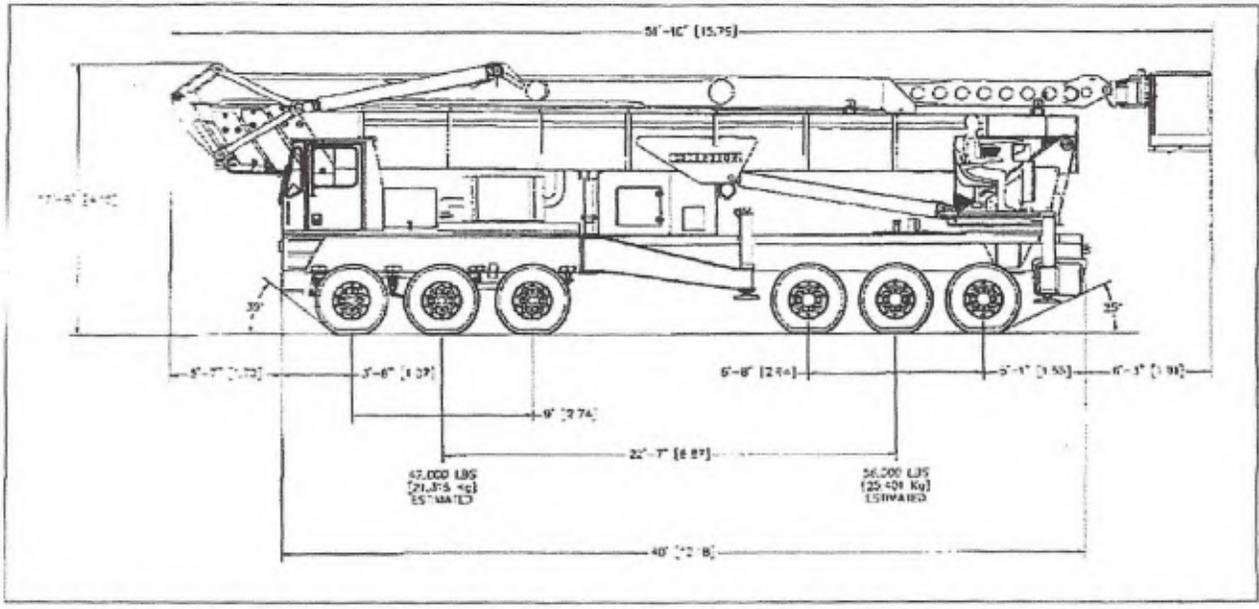


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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 tips 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
<b>Totals</b>	–	–	<b>620</b>	–	–	<b>188</b>

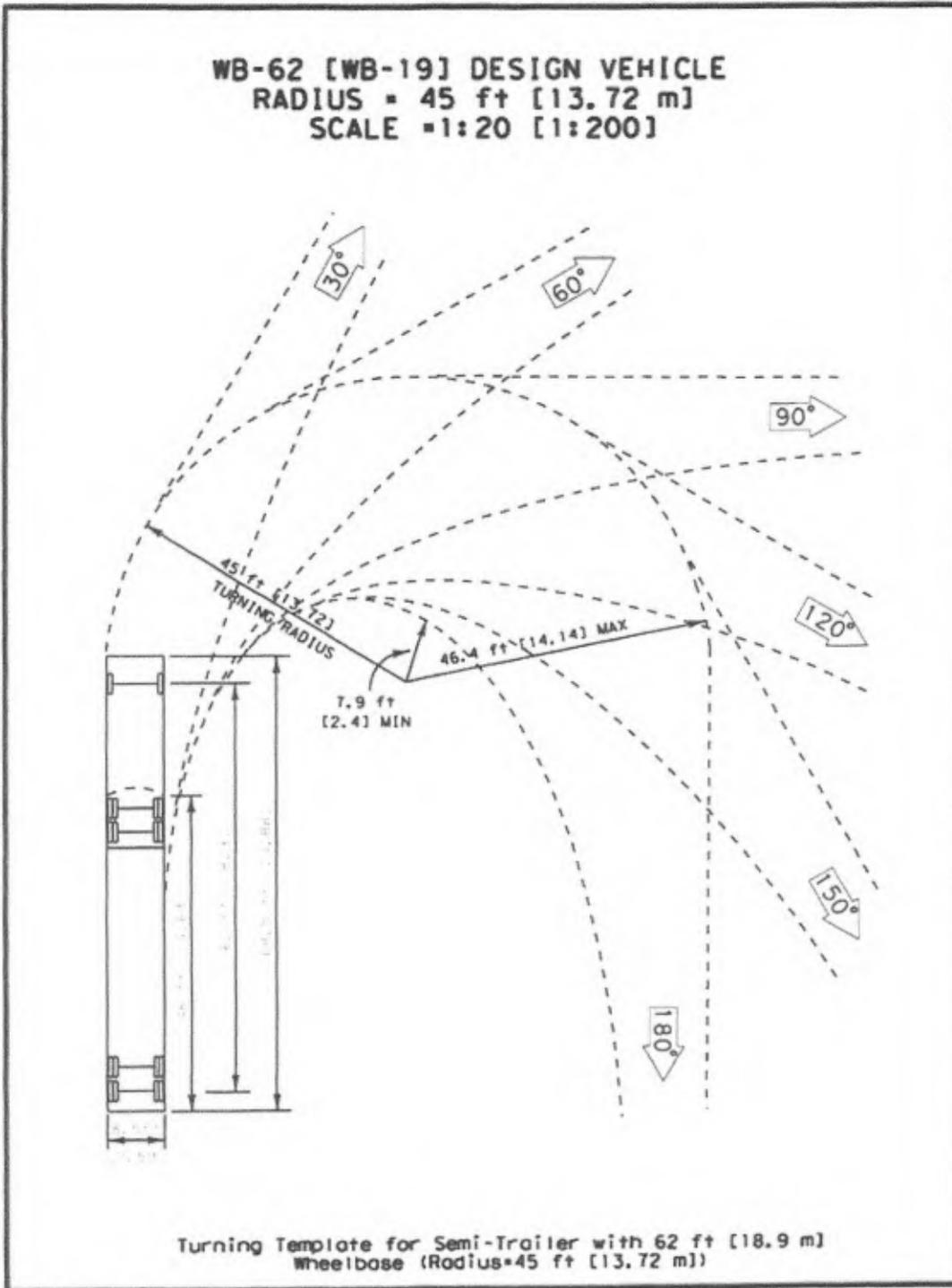


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

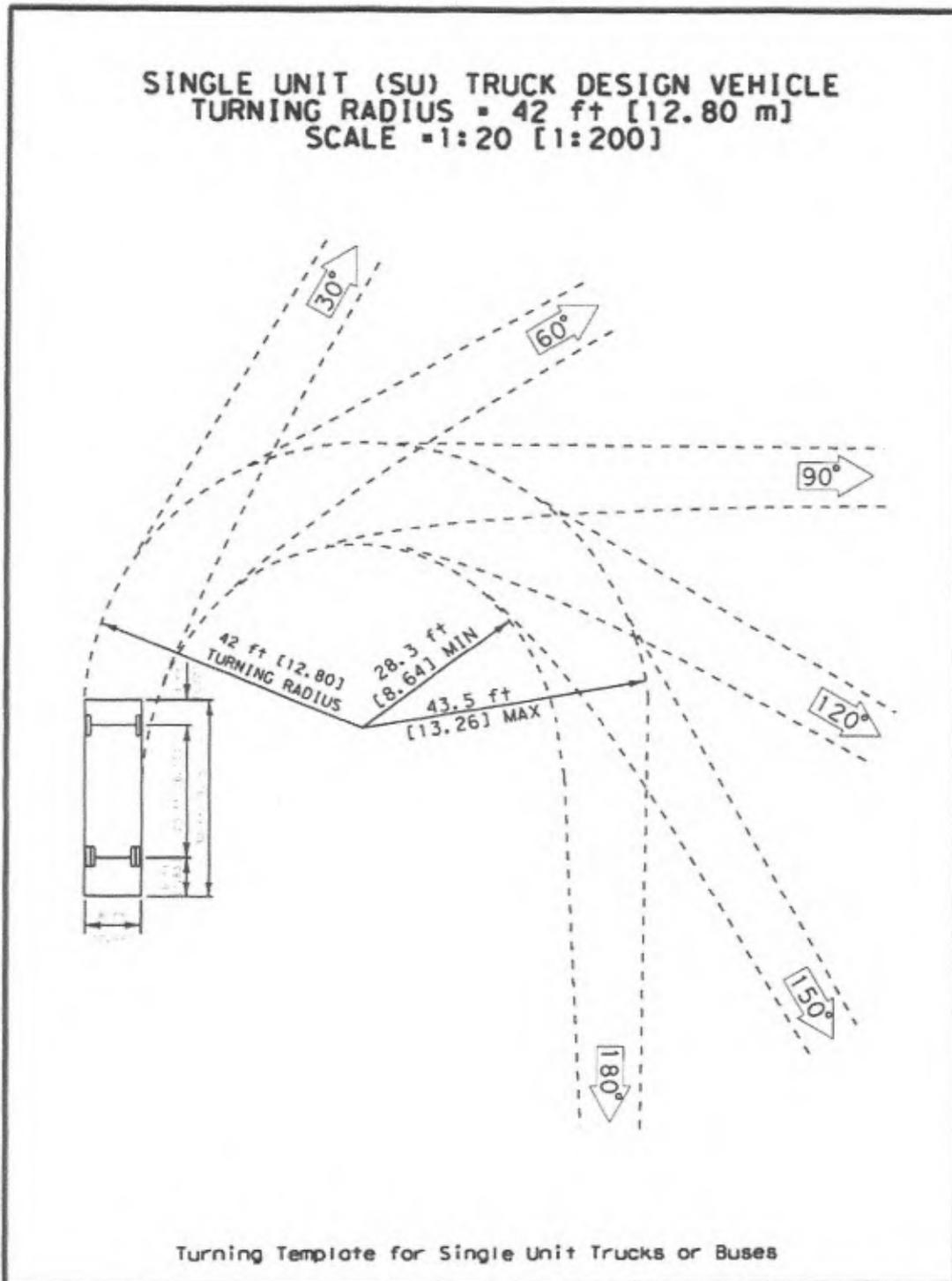


Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

**Section 2.** APPLICABILITY OF STATE TRAFFIC LAWS.

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

**Section 3.** DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

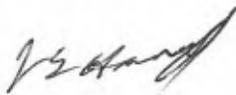
**Section 17. TRUCK ROUTES**

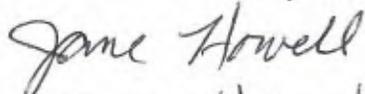
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

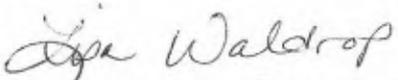
**Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES**

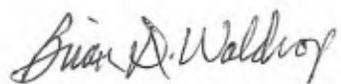
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

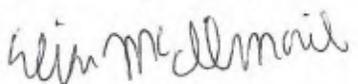
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

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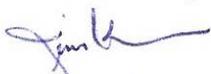
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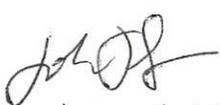
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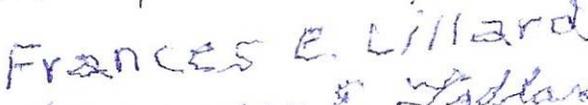
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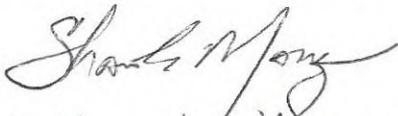
SIGNATURE   
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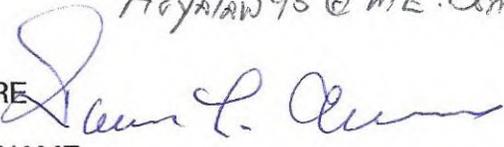
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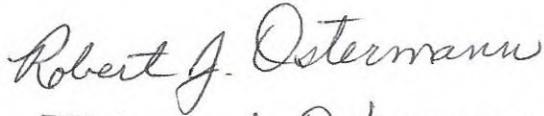
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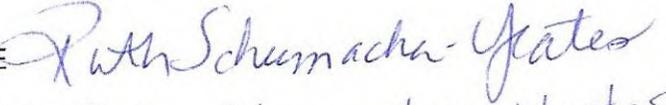
SIGNATURE   
PRINTED NAME Robin J. Ostermann  
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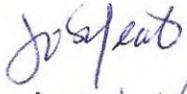
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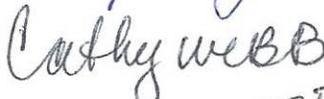
SIGNATURE   
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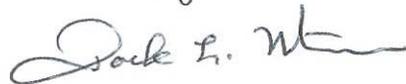
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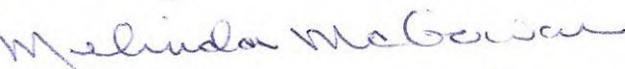
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SIGNATURE *Gary D. Pierson*

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SIGNATURE *Lynn Wheeler Duncan*

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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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SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

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SIGNATURE *Merle E. Comfort*  
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SIGNATURE *Gerald D. Juniper*  
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EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

## TARDAEWETHER Kellen \* ODOE

---

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

related medical problems and exhibit various reactions to loud noises.<sup>10</sup>  
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. <sup>11</sup>

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

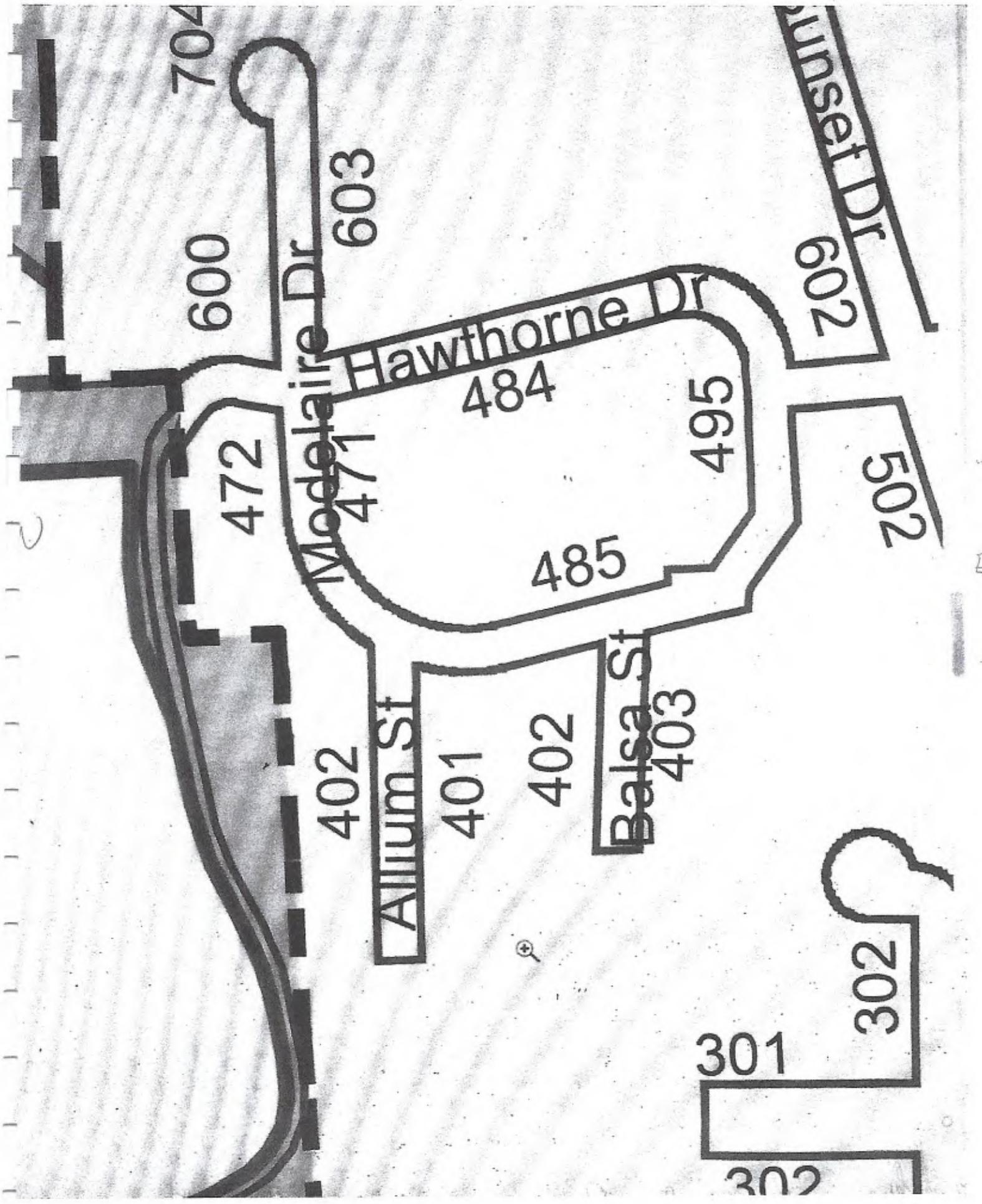
Sincerely,



Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

gmammen@eoni.com

N



### 3.3 Predicted Noise Levels

1 OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation  
2 of the proposed facility.  
3

#### 3.3.1 Construction Noise

##### 3.3.1.1 Predicted Construction Noise Levels

4 Project construction will occur sequentially, moving along the length of the Project route, or in  
5 other areas such as near access roads, structure sites, conductor pulling sites, and staging and  
6 maintenance areas. Overhead transmission line construction is typically completed in the  
7 following stages, but various construction activities may overlap, with multiple construction  
8 crews operating simultaneously:  
9

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

14 The following subsections discuss certain construction activities that will periodically generate  
15 audible noise, including blasting and rock breaking, implosive devices used during conductor  
16 stringing, helicopter operations, and vehicle traffic.  
17

##### **Blasting and Rock Breaking**

18 Blasting is a short-duration event as compared to rock removal methods, such as using track rig  
19 drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills.  
20 Modern blasting techniques include the electronically controlled ignition of multiple small-  
21 explosive charges in an area of rock that are delayed fractions of second, resulting in a total  
22 event duration that is generally less than a second. Impulse (instantaneous) noise from blasts  
23 could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.  
24

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

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

##### **Implosive Devices**

34 An implosive conductor splice consists of a split-second detonation with sound and flash.  
35 Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be  
36 developed by an individual certified and licensed to perform the work. The plan will  
37 communicate all safety and technical requirements including, but not limited to, delineation of  
38 the controlled access zone and distance away from residences.  
39

## 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](http://www.puc.state.or.us).

## Specific Standards for Wind Facilities

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

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

## Specific Standards for Transmission Lines

### OAR 345-024-0090

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



## Department of Environmental Quality

### Chapter 340

#### Division 35

#### NOISE CONTROL REGULATIONS

##### 340-035-0035

##### Noise Control Regulations for Industry and Commerce

###### (1) Standards and Regulations:

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

###### (b) New Noise Sources:

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

###### (B) New Sources Located on Previously Unused Site:

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

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

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

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

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

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

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

(3) Measurement:

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

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

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

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

(4) Monitoring and Reporting:

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

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

(A) Access to the site;

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

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

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

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

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

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

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

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

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

(g) Sounds that originate on construction sites.

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

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

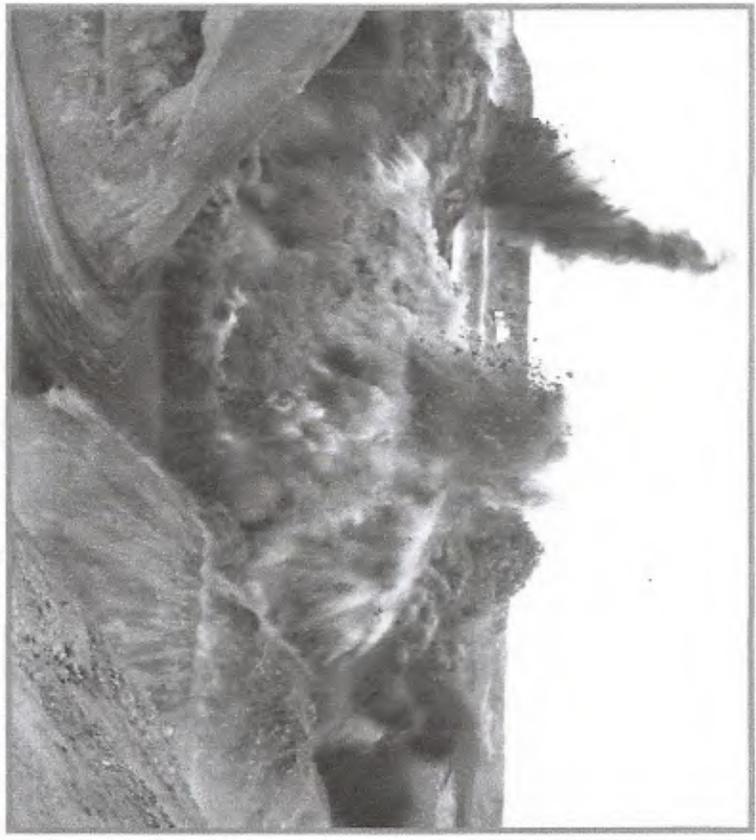
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal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

# Controlling the Adverse Effects of Blasting

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

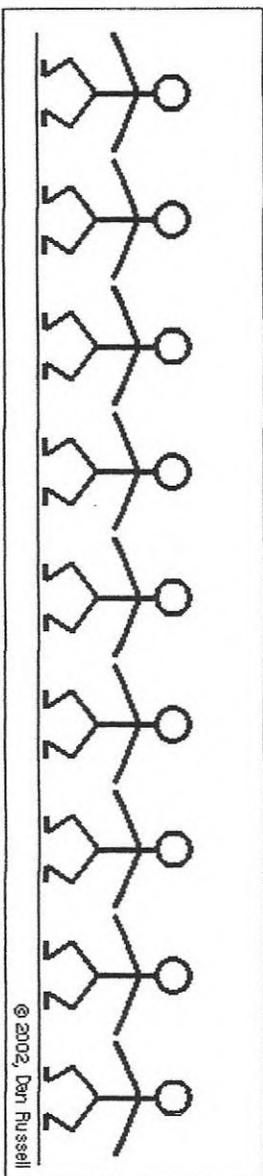
- vibrations,
- airblast, and
- flyrock.

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



## Part I: Ground Vibrations, Airblast, and Flyrock

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



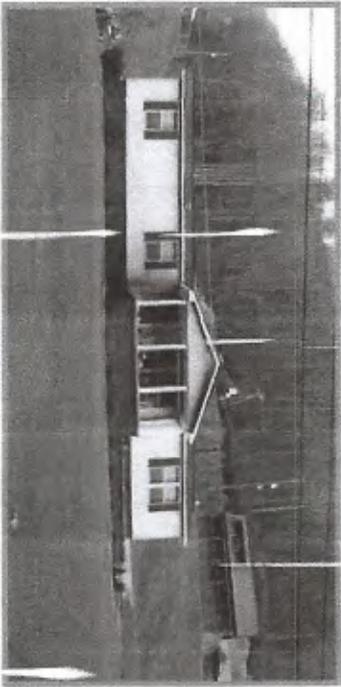
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

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

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

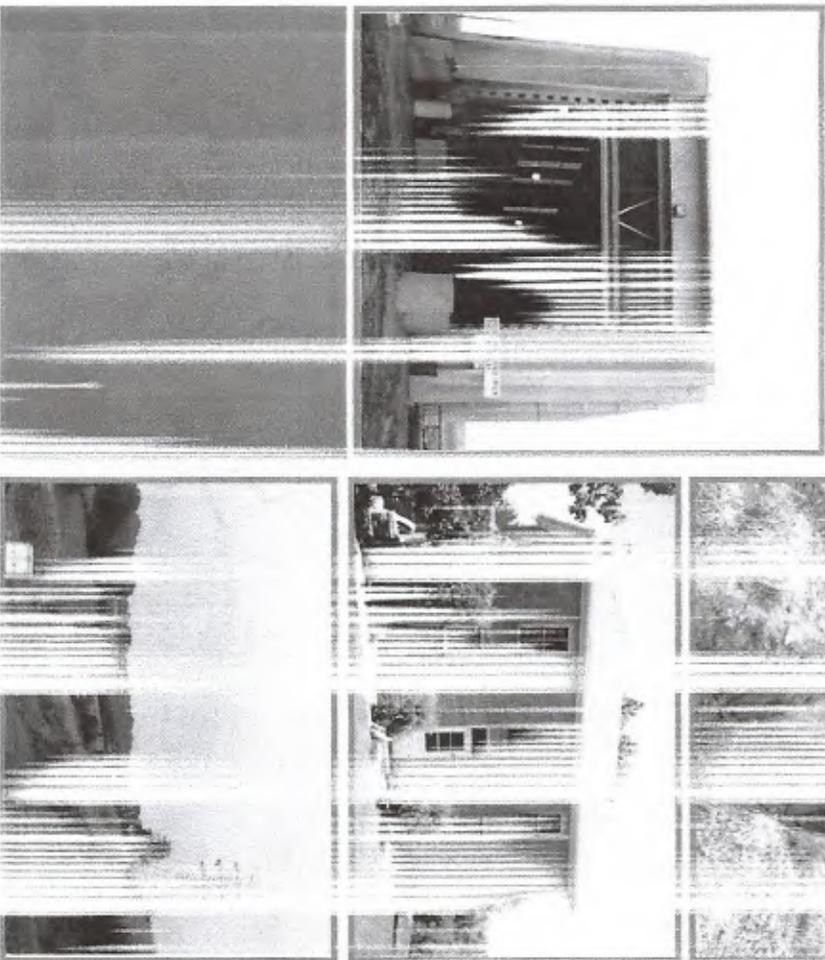
# Blasting Impacts on Structures

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



It is important to understand:

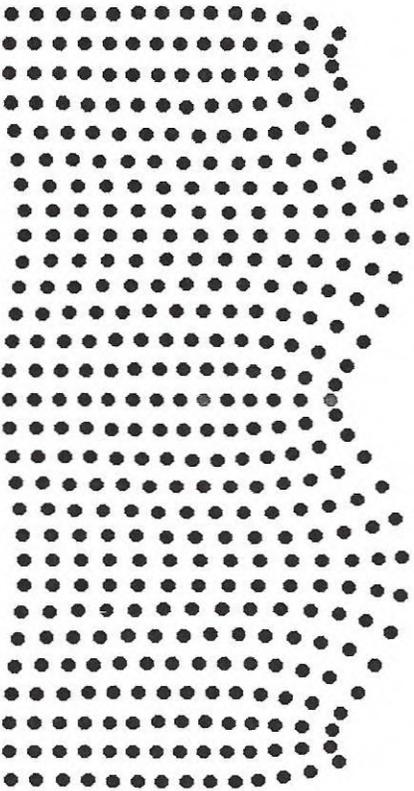
1. the causes of ground vibrations and airblast, and
2. what practices can be followed to control and minimize the adverse effects



## Ground Vibrations

---

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



©1999, Daniel A. Russell

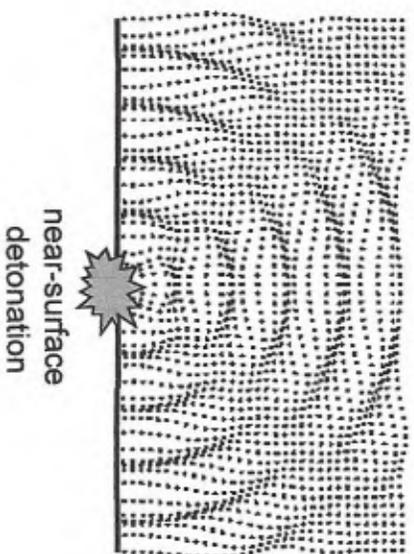
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

# Airblast

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

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



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

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

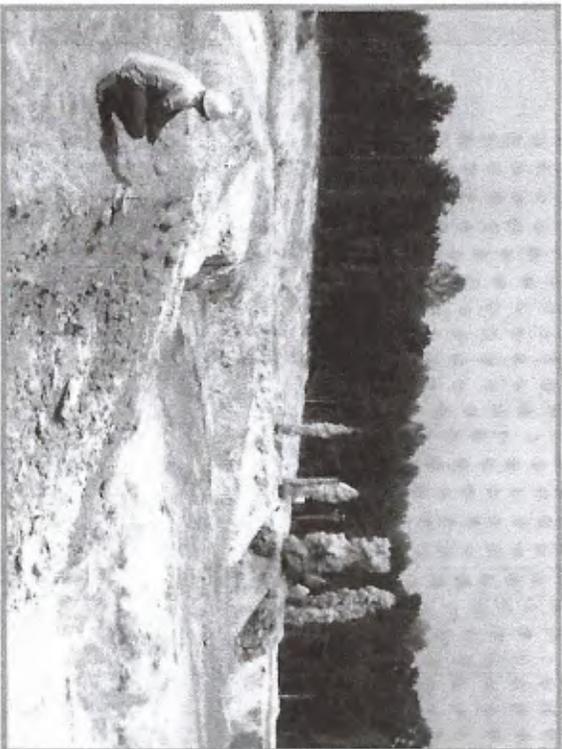


Exhibit 5

# Structure Response

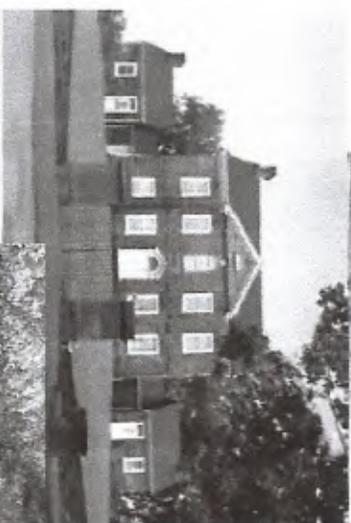
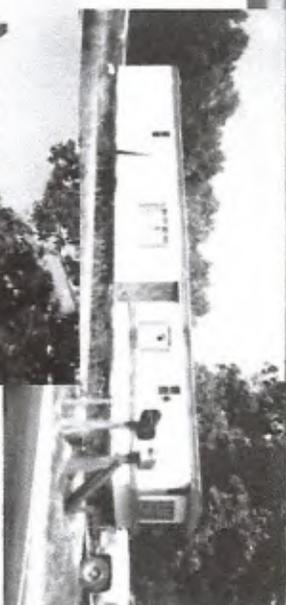
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

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

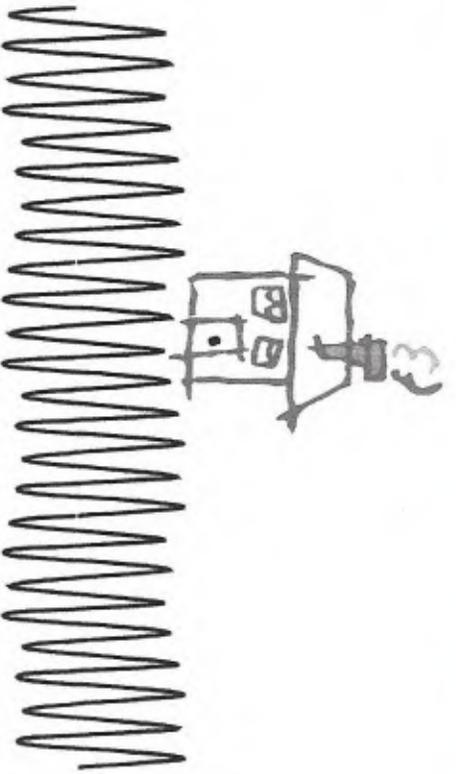
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

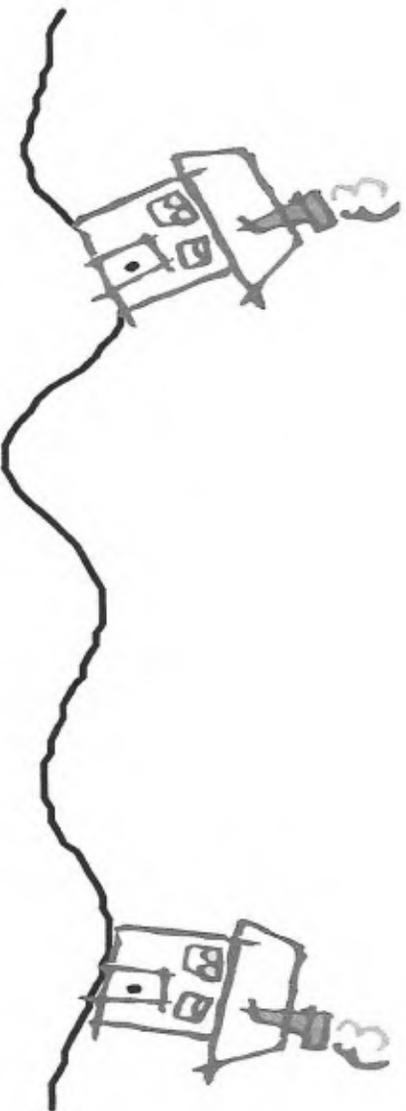


# Ground Vibration Structure Response

Exhibit 59



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.



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.



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*Harvard Men's Health Watch*

## A noisy problem

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

Published: March, 2019



Image: © Juanmonino/Getty Images

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

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

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

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Quiet in the Hospital: How Noise...

## Quiet in the Hospital: How Noise Reduction Helps Patients Heal

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

## References:

Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from [http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424\\_1\\_hospitals-neonatal-intensive-care-unit-noise](http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise)

Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>

Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

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## Noises Are Truly Horrible For People Who Have PTSD

20 Mar '2018 [Sound](#)

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

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

### Symptoms

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

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

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



### Fear

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

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

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

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

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### Abstract

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

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

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

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

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

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

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

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

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

September 5, 2018

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



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

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

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

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

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

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

Where to begin?

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

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

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

### Avoidance versus learning to cope

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

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

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

### Tackling one fear at a time

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

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

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

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

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

### Graded exposure

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

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

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

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

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

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## Additional Resources & Tools

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

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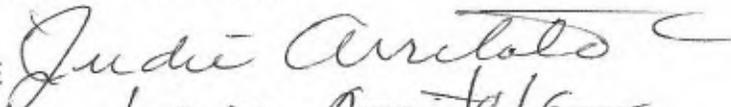


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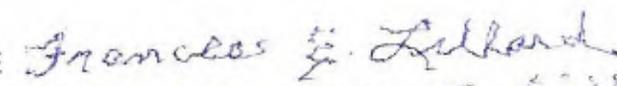
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)

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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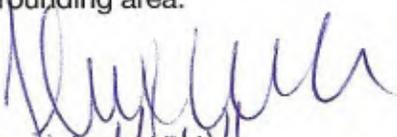
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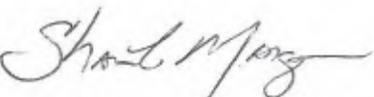
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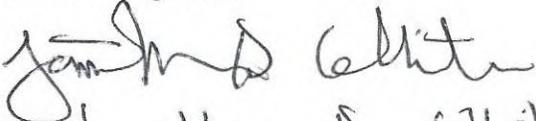
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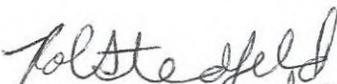
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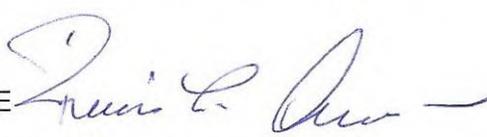
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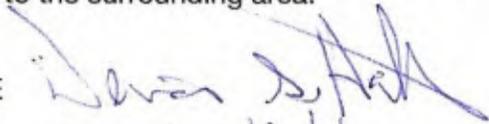
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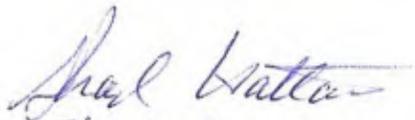
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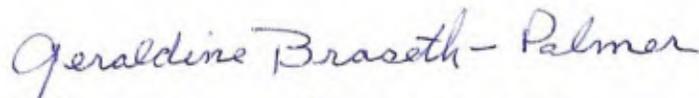
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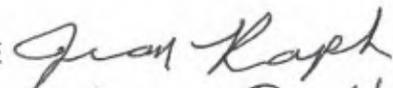
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EMAIL -

SIGNATURE *Anne G. Cavinto*  
PRINTED NAME Anne G. Cavinto  
ADDRESS 86 Hawthorne Dr. La Grande OR 97850  
EMAIL acavinet@ecu.edu

SIGNATURE *Joe Horst*  
PRINTED NAME JOE HORST  
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR. 97850  
EMAIL joehorst@con.com

SIGNATURE *Angela Sherer*  
PRINTED NAME Angela Sherer  
ADDRESS 91 W. Hawthorne Dr La Grande, OR 97850  
EMAIL asherer@frontier.com

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

SIGNATURE

*Merle E Comfort*

PRINTED NAME

MERLE E COMFORT

ADDRESS

209 SUIPIO LA GRANDE OR 97850

EMAIL

merlecomfort@gmail.com

SIGNATURE

*Robin L. Maille*

PRINTED NAME

Robin Maille

ADDRESS

401 Cedar St., La Grande

EMAIL

rmaille@icloud.com

SIGNATURE

*Carol S. Summers*

PRINTED NAME

CAROL S. SUMMERS

ADDRESS

2811 Beketen Lane La Grande, OR.

EMAIL

carolsummers1938@gmail.com

SIGNATURE

*Caroline Kaye Juniper*

PRINTED NAME

Caroline Kaye Juniper

ADDRESS

406 4th Street - La Grande - OR 97850

EMAIL

SIGNATURE

*Gerald D. Juniper*

PRINTED NAME

Gerald Darwin Juniper

ADDRESS

406 4th St. La Grande, OR. 97850

EMAIL

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

SIGNATURE *Robert J. Sherer*  
PRINTED NAME Robert J. Sherer  
ADDRESS 970 Hawthorne Dr, La Grande, OR 97850  
EMAIL asherer@frontier.com.

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

SIGNATURE *Bert R. Freewing*  
PRINTED NAME Bert R. Freewing  
ADDRESS 709 South 12<sup>th</sup> Street La Grande, OR 97850  
EMAIL jeanfreewing@gmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL



# Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Ashley O'Toole

Mailing Address (mandatory) 2 1/2 Depot Sq. #A  
La Grande, OR 97850

Phone Number (optional) (541) 663-7187 Email Address (optional) aso'toole1985@gmail.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](mailto: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.)

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1 impossible. We have families, we have jobs. We can't  
 2 afford litigation. A lot of us, I can't speak for  
 3 everybody, but I know I can't. This whole process is  
 4 the sacrifice of a few to serve the many. It's a  
 5 divide-and-conquer approach. It's not right.  
 6 I have to answer the questions of my kids  
 7 almost every weekend when we work the property, when we  
 8 go to hunt, hike, whatever it is that we do. Why does  
 9 that power line -- meaning the existing power line --  
 10 why does that exist? I don't know, that was before my  
 11 time, but it's here. What are we going to do if another  
 12 one comes through? I don't know. Dad, how is this  
 13 legal, how can they take our property? I don't know.  
 14 Imagine that for a second, trying to answer a  
 15 9-year-old boy of how you can have property and people  
 16 just take it. It's impossible.  
 17 I feel like the Council should take into  
 18 account the ability of the average person to be able to  
 19 comb through this paperwork and to present an articulate  
 20 argument which is being requested and demanded of us.  
 21 It's impossible. The Council should take into account  
 22 the average person's ability to understand and to  
 23 articulate this.  
 24 So ORS says that we have to cite certain  
 25 things; recreation, hunting, hiking. Hiking the Oregon

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1 Trail, the 8th grade me, wildlife, seeing it with my own  
 2 eyes; moose, elk, deer, several species, wolves.  
 3 So I'm happy to announce, Gail was being  
 4 modest, but the last bit of it is historic properties,  
 5 the historic property. We have since allowed  
 6 professional archeologists on to walk the trail, mark  
 7 the trail. It has been approved and recommended to the  
 8 National Historic Preservation Society as historic  
 9 property, in which how do you mitigate that? Just  
 10 because a marker -- or a tower rather, doesn't go right  
 11 in the middle of the trail?  
 12 Guys, we are talking 300 feet or less of not  
 13 only marked trail, some of the best marked trail that  
 14 you will see between here and the inception of Emigrant  
 15 Campground, burial sites. How do you mitigate that?  
 16 You can't. How do you mitigate it for the future  
 17 children? How do you mitigate that for the residents of  
 18 La Grande who may not even know about this?  
 19 I talk to people all the time who don't even  
 20 know this exists. Why the hell would they build another  
 21 power line? I can't answer that. You cannot mitigate  
 22 this. It's impossible.  
 23 Thank you.  
 24 HEARING OFFICER WEBSTER: Thank you.  
 25 Following Ashley O'Toole, we will have Kerry

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1 Tweit.  
 2 MR. ASHLEY O'TOOLE: Hi. My name is Ashley  
 3 O'Toole. I live at 2 1/2 Depot Street in La Grande.  
 4 Thank you to the Council for being here and staying here  
 5 with us to the bitter end and hearing what we all have  
 6 to say. I appreciate that.  
 7 I'll start with referencing a letter To the  
 8 Editor that appeared in "The Observer" that I wrote. It  
 9 was published online on March 7th of this year, titled,  
 10 "Nothing to gain, everything to lose: B2H Transmission  
 11 line is obsolete and devastating." I am just going to  
 12 read a few excerpts and sort of expand on a few of the  
 13 points.  
 14 "The B2H transmission line is a 20th century  
 15 solution in search of a modern problem that doesn't  
 16 exist. It's wasteful, obsolete and potentially  
 17 devastating."  
 18 La Grande has nothing to gain from this  
 19 project and everything to lose. It will ruin our  
 20 surrounding ecosystems, our hunting and recreational  
 21 grounds, and our historical sites, our property values,  
 22 our view of the surrounding mountains and our ability to  
 23 effectively protect ourselves from devastating  
 24 wildfires. All of this, to help a private corporation's  
 25 customers in another state receive hydropower originally

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1 intended for our state and Washington.  
 2 Since 2009, at least 12 similar proposals  
 3 across the country for these new high-voltage  
 4 transmission lines have been denied, and they have been  
 5 replaced by more cost-effective solutions.  
 6 I think that is it from the article. But as  
 7 you can see, I'm definitely of the Stop B2H crowd, not  
 8 move B2H crowd. So we hear people complaining about  
 9 this route or that route. Let it be clear, we really  
 10 are Stop B2H. I want to touch on a few points I think  
 11 from both of those routes, proposed routes.  
 12 I think I wanted to, at least first ask, just  
 13 because I'm not familiar with how long the Council has  
 14 been in town today or yesterday or tonight or tomorrow  
 15 morning, but I'm sure we have read the proposals, I'm  
 16 sure we have reviewed the engineering plans and  
 17 elevations and things. My question is: Perhaps, have  
 18 you yet physically been on Morgan Lake Road or do you  
 19 intend to be on Morgan Lake Road as you research this?  
 20 I think the points I wanted to make were how  
 21 steep it is and how sharp of turns those are, and I  
 22 understand that there could potentially be a mitigation  
 23 plan to that effect. I would love to see where in the  
 24 proposal in writing Idaho Power is really going to be  
 25 compelled to reach certain minimums with the municipal,

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1 the effectiveness of how these in town, along the route,  
 2 both at the county level and the city level.  
 3 Specifically when we talk to residents on the  
 4 Modelaire and Hawthorne Loop, which is in the city  
 5 limits, you guys want to try -- I should say Idaho Power  
 6 would love us to just kind of swallow this Morgan Lake  
 7 route in exchange for, what was it, \$100,000 to make the  
 8 park a little prettier? It doesn't make the towers go  
 9 away. It really doesn't.  
 10 I wanted to -- let me kind of continue to  
 11 expand on a few other points though. You may have also  
 12 already seen what we call the "mock tower," that sort of  
 13 model of the tower up on the hill facing town. That is  
 14 pretty darn close to where one of the proposed towers  
 15 will be on the Mill Creek route.  
 16 By my calculation and guess, if I was standing  
 17 in the middle of the south side of La Grande, say, on  
 18 the EOU football field, we will see about 13 towers,  
 19 plus or minus 1 or 2. I would love to be proven wrong,  
 20 but I have not seen any renderings from Idaho Power of  
 21 what this is going to look like. Surely in their master  
 22 plan that they are trying to sell to you an engineer has  
 23 put together an elevation of a view of what these things  
 24 are going to look like from certain points of view  
 25 overhead and so on.

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1 If they are so proud of the line, why have  
 2 they not shared this, why are we guessing what it could  
 3 look like from a visual standpoint?  
 4 I think one of the other points I wanted to  
 5 make was, we are sending this power over there. Idaho  
 6 Power did announce that there is going to be a new solar  
 7 plant come online, 120 megawatts just south of Twin  
 8 Falls. This kind of speaks to what Mr. Cimon was  
 9 talking about with this paradigm shift. That is solid  
 10 evidence of that concept, and it's announced and  
 11 probably touted by the same energy corporation that is  
 12 touting the archaic solution to the same problem.  
 13 So we have not seen the power demands in Idaho  
 14 follow the trends that they hoped they would see. The  
 15 population didn't grow like we said it would, people are  
 16 moving to more energy-efficient appliances and light  
 17 bulbs and smart meters. So how can you tell me 2026,  
 18 when this thing is scheduled to come online, that we are  
 19 going to need it.  
 20 I would love Idaho Power -- I just need to see  
 21 more proof from them that they actually need this line 5  
 22 years from now, 7, geez, 7 years from now, Matt. So  
 23 that's another point.  
 24 I think another point I'd like to touch on  
 25 here real quickly, looking at the time here especially,

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1 I am a real estate agent. And a point that hasn't  
 2 really been brought up very much, I think the Mayor  
 3 briefly mentioned that property values that are going to  
 4 be affected. As a real estate agent, I've already seen  
 5 this in our town. If you guys are interested, there is  
 6 a listing on Gekeler Lane right now, directly underneath  
 7 the 230kV line, where we currently get our power, that  
 8 listing agent has told me that that house was on the  
 9 market for most of last year with no success. Here we  
 10 are back in the selling season, it's still sitting on  
 11 the market with no success.  
 12 I can tell you with firsthand evidence, 2  
 13 years ago I sold a house that was on the market for 4  
 14 years because it was underneath the 230kV line.  
 15 So we are not just talking about home values,  
 16 but also just marketability, sellability. I mean,  
 17 people pull up on the driveway and they see the giant  
 18 power lines and they turn around. It's over.  
 19 There are many, many citizens on Morgan Lake  
 20 Road, Wood Road, and Marvin Lane, Modelaire and  
 21 Hawthorne, that are going to be dealing with this, and  
 22 Idaho Power's attempt to give them a one-time cash  
 23 payment for an easement to make them go away, it's not  
 24 going to work for the next generation, it's not going to  
 25 work to help sell that property down the line. There is

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1 going to be a very real effect on property values for  
 2 many, many of our citizens along the route.  
 3 The last point I wanted to make was about the  
 4 blasting in the geological hazard zone. Again, as a  
 5 real estate agent, I can give you evidence of a home on  
 6 Modelaire that was affected by recent blasting from  
 7 Grande Ronde Hospital. The hospital put in a parking  
 8 lot, they had to demolish or blow away a lot of earth.  
 9 When I submit my written statement -- I see my  
 10 time is up. When I submit my written statement to you,  
 11 I will demonstrate evidence from a home inspection  
 12 immediately before and after of a 3-inch crack in that  
 13 foundation that formed. Of course, correlation is not  
 14 always causation, but it's a pretty sure thing. It has  
 15 something to do with all the damn dynamite that was  
 16 going on for months and months right across the street.  
 17 Don't let them blast in the geological hazard  
 18 zone. You are asking for landslides, you are asking for  
 19 a lot of other dangerous things.  
 20 I've got more to talk about, but I want other  
 21 people to speak. Again, I really thank you all for  
 22 coming out this evening. Have a good night.  
 23 HEARING OFFICER WEBSTER: I don't know yet if  
 24 the Applicant wants to make any statements tonight or  
 25 not, but let me know.

Ashley O'Toole

road damage. no written  
promise of repair.  
How do we know these  
aren't empty promises?

→ Has council traveled ML road?  
- you've seen elevation map +  
engineer plans but have you actually  
seen it?

demand in 2026?

housing market <sup>Blasting ex</sup>  $\leq$  quite showing  
less values  
Renderings?

Solar Plant In Idaho  
south of twin falls 120 MW

Fire Mitigation - no project is best

dynamite in geo hazard  
Hawthorne etc.

approx 12 towers visible from  
low football field. Renderings?

Fire  
⊗

Stop, not move

August 14, 2019

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

Via E-MAIL: [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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

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

48.26°N 117° 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.

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

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

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

Thank you,



Signature

Printed Name:

Ashley O'Toole

Mailing Address:

2 1/2 Depot St. # A  
La Grande, OR 97850

Email:

aso+toole@gmail.com

August 5, 2019

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

[B2H.DPOComments@Oregon.gov](mailto: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 8<sup>th</sup> 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](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: Ashley O'Toole

Address: 2 1/2 Depot St #A  
La Grande, OR. 97850

## **TARDAEWETHER Kellen \* ODOE**

---

**From:** Cecelia Otto <ceceotto@yahoo.com>  
**Sent:** Thursday, August 15, 2019 7:15 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019

### **Dear Chairmen Beyeler and Members of the Council:**

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

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

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

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

Thank you,

A handwritten signature in black ink, appearing to read "Cecelia Otto". The signature is written in a cursive style with a large, stylized initial "C" and "O".

Printed name: Cecelia Otto

Mailing address: 4630 NE Hancock Street, Portland, OR 97213

Email address: [ceceotto@yahoo.com](mailto:ceceotto@yahoo.com)

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.

*Melissa Over*

(Signature)

Name: *Melissa Over*

Address *PO Box 71*  
*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](mailto: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: *Melissa Over*

Mailing Address: *Po Box 71  
Cave 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](mailto: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,

Melissa Over

Signature

Printed Name: *Melissa Over*

Mailing Address: *PO Box 71  
Cove OR 97824*

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 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 which will be addressed in a separate comment.

Melissa Over

Signature

Name: *Melissa Over*

Address: *PO Box 71*  
*Cove OR 97824*

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

August 5, 2019

[B2H.DPOComments@Oregon.gov](mailto: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,

Melissa Over

Name: *Melissa Over*

Address: *Po Box 71  
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](mailto: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:

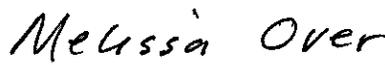
**Drill site 95/3 and 95/4, and its vicinity**, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems 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: *PO Box 71  
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 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](mailto: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 8<sup>th</sup> 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](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,

*Melissa Over*

---

Name: *Melissa Over*

Address: *PO Box 71*  
~~La Grande, OR. 97850~~  
*Cove 97824*

August 2, 2019

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

Melissa Over  
Signature

Melissa Over  
Printed Name

Mailing Address: PO Box 71  
Cove OR 97824



# 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) Bruce Owen

Mailing Address (mandatory) PO Box 137 Durkee Or 97945

Phone Number (optional) (541) 877 2245 Email Address (optional) \_\_\_\_\_

Today's Date: 6/19/19

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

Written comments can also be submitted today.

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

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

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy 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 on

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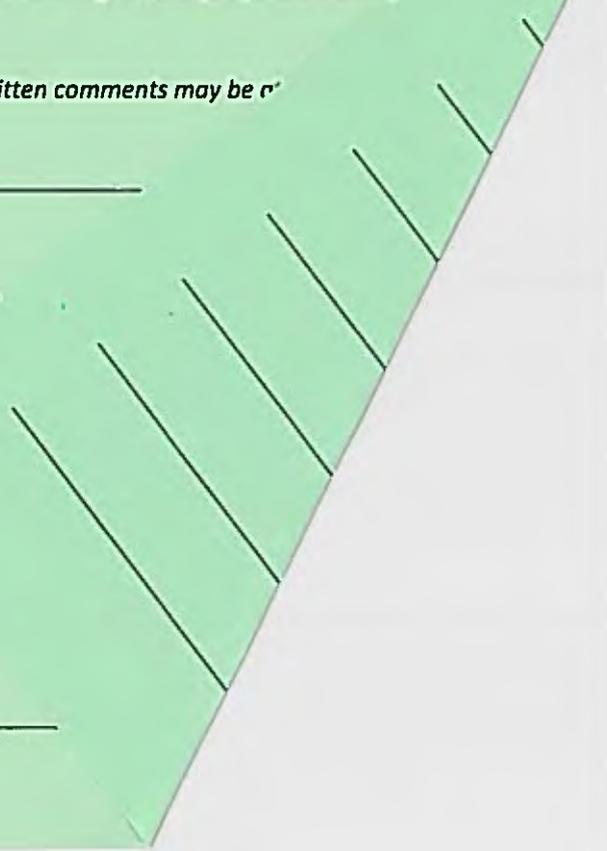
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Page 54

1 I'd like to digress momentarily to put forth a  
 2 brief history of where I'm coming from. No. 1, I've  
 3 been here in this area long enough to remember some of  
 4 the promises that were made by Idaho Power. Fish  
 5 passage either fish ladder, trucks or with -- pardon me,  
 6 thank you, Todd -- or with the construction of  
 7 fish-raising facilities. In every case, they have  
 8 waffled under these regulations to which is part of  
 9 Oregon law.

10 I could go on and have reams of material I've  
 11 collected on this. I'll get to some of the more recent  
 12 things here. Idaho Power most recently went to Oregon  
 13 asking about changing the laws about fish habitat in the  
 14 Snake River. They managed to do it, not because Oregon  
 15 felt it was appropriate, this was against Oregon law as  
 16 it stood, but because our own politicians waffled  
 17 underneath this.

18 This has been done over and over again. Most  
 19 recently in the paper as of June 6, 2019, once again,  
 20 our own politicians waffled under the regulations of  
 21 fish habitat, the passage of Clean Water Acts. It goes  
 22 on and on.

23 From a personal standpoint, the property to  
 24 which I have that is being impacted, years ago, 20 years  
 25 ago, we were required by Oregon state law to build

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1 another road that did not follow a tributary to Ladd  
 2 Creek. That road was built because we were required by  
 3 Oregon law to do it. This very same power line that B2H  
 4 wants to put in impacts that same tributary. A 250-foot  
 5 wide swath of barren ground to which they said they did  
 6 not want a road, barren ground road next to the water  
 7 source that would impact the redband trout.

8 Question to Oregon I have: Why is it I have  
 9 to obey Oregon laws and Idaho Power does not?

10 The other thing I question about that, too, in  
 11 terms of habitat, if you look at an aerial photograph of  
 12 our place, it's the only place within miles that has  
 13 old-growth timber, that has been a wildlife habitat in  
 14 our family for 60 years. That, in effect, is going to  
 15 be erased by this B2H line.

16 The question remains: Who's running Oregon;  
 17 Idaho or the Oregon citizens?

18 CHAIRMAN BEYELER: I did have one question.  
 19 MR. WAYNE KAAEN: Yes.

20 CHAIRMAN BEYELER: The nature of the lobbying  
 21 that you have talked about with Idaho Power, that was  
 22 with the Oregon Department of Fish and Wildlife or the  
 23 Oregon DEQ?

24 MR. WAYNE KAAEN: Near's I can tell it was  
 25 both.

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1 CHAIRMAN BEYELER: Was the nature of it  
 2 nitrogen supersaturation?

3 MR. WAYNE KAAEN: It had to do with water  
 4 temperature, it had to do with fish passage, and it had  
 5 to do with pollution in the river. Those three items  
 6 are the items that I researched on.

7 CHAIRMAN BEYELER: Okay. Thank you.

8 MR. WAYNE KAAEN: This is all on the Internet  
 9 that I have got out. And the last portion is my own  
 10 personal experience. Everything before that is stuff  
 11 that I extracted off the Internet and Oregon laws.

12 CHAIRMAN BEYELER: Will that be submitted?  
 13 MR. WAYNE KAAEN: I thought I just submitted  
 14 it.

15 CHAIRMAN BEYELER: I mean in writing, the  
 16 article?

17 MR. WAYNE KAAEN: I can do that, but I cannot  
 18 afford a dozen Philadelphia lawyers to defend me either.  
 19 Idaho Power can and I can't. But I suppose I could get  
 20 somebody to write up something for me. Would that be  
 21 appropriate?

22 CHAIRMAN BEYELER: Yes.

23 MR. WAYNE KAAEN: Okay, Barry. Thank you very  
 24 much for that comment. I appreciate it.

25 HEARING OFFICER WEBSTER: And if you submit

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1 it, please do so by July 23rd.

2 MR. WAYNE KAAEN: Boy, that's quite a time.  
 3 That really puts me under the crunch. Okay. Thank you.

4 HEARING OFFICER WEBSTER: Thank you.  
 5 Mr. Owen?

6 And is there anybody on the phone that would  
 7 like to give comment? Hearing none, we will take a  
 8 break after we hear from Mr. Owen, probably about a  
 9 15-minute break, and then we'll reconvene and then I  
 10 have a comment card here, we'll hear from Idaho Power.

11 MR. BRUCE OWEN: My name is Bruce Owen. I  
 12 live at 27910 Oxman Ranch Lane in Durkee, Oregon.

13 HEARING OFFICER WEBSTER: Your street name  
 14 again.

15 MR. BRUCE OWEN: 27910 Oxman Ranch Lane,  
 16 Durkee.

17 HEARING OFFICER WEBSTER: Thank you.

18 MR. BRUCE OWEN: You're welcome.

19 Twenty-five years ago, I retired and moved to  
 20 a lifelong dream of mine, a ranch in the Durkee area. I  
 21 bought it because of the scenic value and the isolation  
 22 with that. And for 25 years I've lived happily on that  
 23 ranch with the elk and the deer, and all the other game  
 24 animals there.

25 There is a power corridor through Durkee right

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1 down the freeway. There's two roads on Highway 30,  
 2 Interstate 84, and there is a railroad track with  
 3 multiple tracks through Durkee. There's a gas line --  
 4 two gas lines, as a matter of fact. And already at  
 5 least one power line that I know of.  
 6 And why they deviated from that direct route  
 7 up the power corridor in Durkee, I have no idea. But  
 8 they have put -- they've deviated to the southwest right  
 9 through the middle of my ranch. I mean, right through  
 10 the middle of my ranch.  
 11 I've had some discussions with Idaho Power,  
 12 and they have talked to me about maybe running it down  
 13 the south border of my ranch and then up the west side.  
 14 I said if worse comes to worse, I can agree to that.  
 15 But then I found out that they won't even talk to me  
 16 about it with any authority until after this meeting  
 17 that we have now and after the Siting Commission comes  
 18 up with their comments.  
 19 So I really have no good feelings about what  
 20 may happen. They've not promised me anything at all  
 21 except that they would avoid my cabin and my house by  
 22 the noise allotment area of 2,000 feet. Which, I mean,  
 23 that's nice I guess. But still right through the middle  
 24 of the ranch. It's been a lifelong dream, and I resent  
 25 it very much.

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1 And you know, if it was in a direct route  
 2 through the area, I could understand it. But they're  
 3 actually leaving the power corridor by about 2 1/2 miles  
 4 to come through my place. And for the life of me, I  
 5 don't understand why. And I would appreciate it if  
 6 someone would tell me the reason for that.  
 7 Those are the comments I have. They're  
 8 personal and I feel very strongly about them.  
 9 HEARING OFFICER WEBSTER: Thank you.  
 10 MR. BRUCE OWEN: Do you have any questions?  
 11 CHAIRMAN BEYELER: No.  
 12 HEARING OFFICER WEBSTER: Okay. It is  
 13 2 minutes to 6:00. Why don't we take a break and we'll  
 14 try and get everybody back and reconvene about 6:15.  
 15 (Recess taken.)  
 16 HEARING OFFICER WEBSTER: All right. Thanks  
 17 everybody for taking your seat again. We're back on.  
 18 We have one more commenter before we hear back  
 19 from Idaho Power. And Commissioner Bruce Nickels wanted  
 20 to make a statement?  
 21 UNIDENTIFIED SPEAKER: (Off microphone.)  
 22 HEARING OFFICER WEBSTER: Ma'am, I was just  
 23 clarifying that this is an opportunity to give your  
 24 comment, but the Council is not going to be answering  
 25 questions. But you'll have your opportunity to be heard

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1 tonight.  
 2 UNIDENTIFIED SPEAKER: Thank you.  
 3 HEARING OFFICER WEBSTER: Mr. Nickels. Thank  
 4 you.  
 5 COMMISSIONER BRUCE NICKELS: Thank you for  
 6 making me first.  
 7 So basically what I'm going to do is reiterate  
 8 what Baker County's position is. And one, the first  
 9 thing, there's no mitigation for the people that have  
 10 been promised things from Idaho Power in Durkee. And  
 11 the farm ground there is important to people. And  
 12 there's been cases that there's other sites that are  
 13 better.  
 14 Anyway, that's what I wanted to say. They  
 15 were promised they would be taken care of. That's now  
 16 been taken away, for whatever reason, I don't know.  
 17 There's also the Oregon Department of Energy.  
 18 There hasn't been any analysis done of burial to  
 19 mitigate the visual impact of the Interpretive Center or  
 20 compensatory mitigation for Baker County. That  
 21 Interpretive Center is very important to tourism for our  
 22 whole county and all of eastern Oregon. Tourism is very  
 23 important to Baker, and we have a hard enough time  
 24 trying to build that up and then you take away the  
 25 visual aspect of it, and you're making us go backwards

Page 61

1 again. And we get nothing other than grief out of it.  
 2 The last thing, you didn't comply with Baker  
 3 County's land use plan. We need a substation if you're  
 4 going to put this thing here. And I know substations  
 5 cost a lot of money but Baker County is getting really  
 6 nothing out of this but grief. And with power, extra  
 7 power for Baker, we have a chance of some economic  
 8 development. We need some or a lot of power for  
 9 manufacturing and also business. If we don't have that,  
 10 Baker County has little chance to grow because we don't  
 11 have enough power; we can't attract those kind of  
 12 businesses.  
 13 So that's all I have to say. Other than the  
 14 fact I personally don't want to look at the dang lines  
 15 because I'm living very close to the freeway so I will  
 16 be able to see them, whether they're brown or whatever  
 17 color you want to make them. So I really don't want to  
 18 look at those. You should have put them on the other  
 19 side of somebody else's hill.  
 20 So thank you.  
 21 HEARING OFFICER WEBSTER: Thank you. And  
 22 we'll need the green sheet.  
 23 MR. BRUCE NICKELS: Yes. I told you I'd give  
 24 you that.  
 25 HEARING OFFICER WEBSTER: And I don't know if

August 18, 2019

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

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:

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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.

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areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

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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.

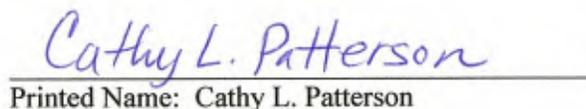
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I appreciate your consideration and your attention to this matter.

Sincerely,

  
Signature

  
Printed Name: Cathy L. Patterson

Mailing Address:  
405 First 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.

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c/o Kellen Tardaewether, Siting Senior Analyst  
Oregon Department of Energy  
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July 27, 2019

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c/o Kellen Tardaewether, Siting Senior Analyst  
Oregon Department of Energy  
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Via EMAIL: [B2H.DPOComments@Oregon.gov](mailto:B2H.DPOComments@Oregon.gov)

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Sincerely,

  
Signature Printed Name:

Mailing Address: 60751 Wood Road  
LaGrande, OR 97850

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August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

In summary:

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

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

 \_\_\_\_\_  
Signature Printed Name

Mailing Address: 60751 Wood Road  
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](mailto: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 8<sup>th</sup> 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](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,

Janetta S. Paul

Name: Janetta S. Paul

Address: 66751 Wood Road  
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](mailto: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: JANETTA S. PAUL

Mailing Address: 60751 Wood Road  
LaGrande, OR 97850

August 5, 2019

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

Via EMAIL: [B2H.DPOComments@Oregon.gov](mailto: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:

LANETTA S. PAUL

Mailing Address:

60751 Wood Road  
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](mailto: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,

Lanetta S. Paul

Name: Lanetta S. PAUL

Address:

66751 Wood Road  
Le 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) Gary Pearson

Mailing Address (mandatory) 654 King Ave  
Ontario, Oregon 97914

Phone Number (optional) ( ) \_\_\_\_\_ Email Address (optional) gary6707@msn.com

Today's Date: 6/18/2019

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

Written comments can also be submitted today.

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

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

*Will follow Roger Finley*  


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.)

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1 Someone is going to comment on that later. "The  
 2 alternative route," called the Double Mountain, does  
 3 cross "the Owyhee Wild and Scenic River. Someone has  
 4 decided that Wild and Scenic Rivers is a higher priority  
 5 than EFU land, both have to be addressed in EFU [sic]  
 6 criteria. The other...concern is Northwest of Vale  
 7 [Oregon] where the B2H [power line] again crosses EFU  
 8 land. The alternative route there crosses Sage Grouse  
 9 habitat. Again, both EFU and Wildlife habitat are  
 10 points that have to be addressed by EFSC. Again someone  
 11 has decided that Sage Grouse habitat is a higher  
 12 priority than EFU land. SIP is asking EFSC to evaluate  
 13 ORS 345-20-10 which defines what EFU land is and the  
 14 protection it is afforded. We also ask for EFSC to  
 15 evaluate ORS 215.275 which lists the criteria that  
 16 [does] allow the power line such as B2H to cross EFU  
 17 land.

18 "In summary, SIP is generally well pleased  
 19 with Idaho Power for stopping the fast track process in  
 20 2010 and listening to all the stakeholders. Through a  
 21 collaborative [process] we have devised the best  
 22 possible route for the B2H power line through Malheur  
 23 County. SIP would like to see Idaho Power go ahead and  
 24 construct the power line. Most...members of SIP are  
 25 engaged in farming. With pressure from the Clean Water

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1 Act, many acres of EFU land are [now] being converted  
 2 from surface flow...to either" drip or sprinkler  
 3 irrigation. "Making this switch requires energy to run  
 4 pumps and motors. Also SIP understands that the greater  
 5 Boise area is experiencing a booming population growth.  
 6 Both these factors together contribute to greater  
 7 consumption of electrical power each year. Though some  
 8 of this increased demand has been met through the use of  
 9 renewable energy...such as wind and solar, irrigators  
 10 need power 24/7...not only when the wind blows or the  
 11 sun shines. SIP applauds Idaho Power for looking into  
 12 the future and trying to provide for our needs.

13 "Sincerely, Roger Findley."  
 14 HEARING OFFICER WEBSTER: Thank you,  
 15 Mr. Findley.  
 16 Just before we hear from Mr. Pearson, the next  
 17 one up after Mr. Pearson will be Jay Chamberlin.  
 18 And Mr. Findley, for the record, if you could  
 19 please state your address.  
 20 MR. ROGER FINDLEY: 3535 Butte Drive, Ontario,  
 21 Oregon.  
 22 HEARING OFFICER WEBSTER: Thank you.  
 23 Mr. Pearson, your name and address.  
 24 MR. GARY PEARSON: Thank you.  
 25 Hello. My name is Gary Pearson. And while I

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1 might be a stranger to you folks, I assure you I'm not a  
 2 stranger to this project or, in fact, Idaho Power.  
 3 I'm a long-time resident of Malheur County,  
 4 and I've been involved as a concerned citizen with the  
 5 B2H project for over 10 years. That involvement  
 6 includes being in the first meetings with officials from  
 7 Idaho Power outlining our reasons for resisting their  
 8 original planned route for the 500-kV power line. I was  
 9 on the citizens advisory panel set up by Idaho Power,  
 10 which resulted in numerous additional meetings with  
 11 Idaho Power which finally resulted in an alternative  
 12 route that would avoid Malheur County exclusive farm use  
 13 agricultural land.

14 I have testified in front of several  
 15 government entities, including a government hearing in  
 16 Salem. I am a board member of the nonprofit entity  
 17 known as Stop Idaho Power. That group was instrumental  
 18 in the decision by Idaho Power to institute the claims  
 19 advisory process in the first place.

20 The only reason I am outlining my history with  
 21 this project is to document for the record the fact that  
 22 I parrot the same exact issues that Roger Findley just  
 23 outlined involving the entire process, and as well as  
 24 the fact that the area near Adrian and north of Vale,  
 25 the line is still going across some acreage that is

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1 classified as EFU land.  
 2 And I further want to document the fact and  
 3 get on record that after 10 years of effort involving  
 4 hundreds of hours of time, I do not want to be shut out  
 5 from further proceedings and/or hearings down the road  
 6 if they become necessary.

7 I would also like to applaud Idaho Power in  
 8 having the wisdom to listen to the citizens of Malheur  
 9 County, and work with us to change their original plan  
 10 and work to find an alternative route that would avoid  
 11 damaging the Malheur County agricultural industry, which  
 12 is basically our only industry. We are very, very close  
 13 to that goal.

14 Thank you.  
 15 HEARING OFFICER WEBSTER: Mr. Pearson, if you  
 16 would please just add your address for the record.  
 17 MR. GARY PEARSON: I live at 654 King Avenue,  
 18 Ontario, Oregon 97914.  
 19 HEARING OFFICER WEBSTER: Thank you.  
 20 MR. GARY PEARSON: If you'd like a copy of  
 21 this, I would like to give you a clean copy. This looks  
 22 like a road map because I made many changes in the last  
 23 10 minutes.  
 24 HEARING OFFICER WEBSTER: Before we hear from  
 25 Mr. Chamberlin, the next up is Irene Gilbert.

## **ESTERSON Sarah \* ODOE**

---

**From:** Kathy PfisterMinogue <kate.pfisterminogue@gmail.com>  
**Sent:** Thursday, August 22, 2019 4:56 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** stop B2H

Greetings

Like many of us in Eastern Oregon, I vehemently oppose B2H. I hope you are listening to the large numbers of citizens here who oppose this transmission line which has no benefit to anyone living here and in fact is a large detriment. It will place 1228, 150 foot high towers that will destroy the view in our scenic community where tourism is important and where those of us who live here value the view shed. It will decrease many land values. It involves a 305 mile area of clear cut and affects over 11,000 acres of farmland. Perhaps when the original plan was made, the transmission of power line across long distances was more needed. Currently, the increased accessibility of solar energy along with better systems of energy storage make this expensive and disruptive power line obsolete. Additionally, micro grids are much safer in terms of disruption from outside attacks on our power systems.

I sincerely hope you will listen to those of us who live in this community. I hope you will have the courage to reconsider this plan

Kathy Pfister-Minogue  
54338 Mt Emily road  
La Grande Oregon 97850  
5419107903

## TARDAEWETHER Kellen \* ODOE

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**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" <sup>1</sup> specifically the Modelaire-Hawthorne Loop) <sup>2</sup>, 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." <sup>3</sup>

My impression from reviewing the application Page 17 <sup>4</sup> 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. <sup>2</sup>

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." <sup>5</sup>

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

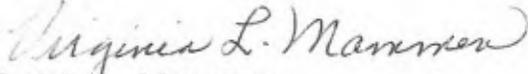
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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 <sup>4</sup>	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 <sup>5</sup>	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 <sup>1</sup>	Total Paved Width <sup>2</sup>	Total ROW Width <sup>3</sup>	Private Access Spacing
Downtown Arterial	required	12'	3'6" <sup>6</sup>	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

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

<sup>2</sup>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.

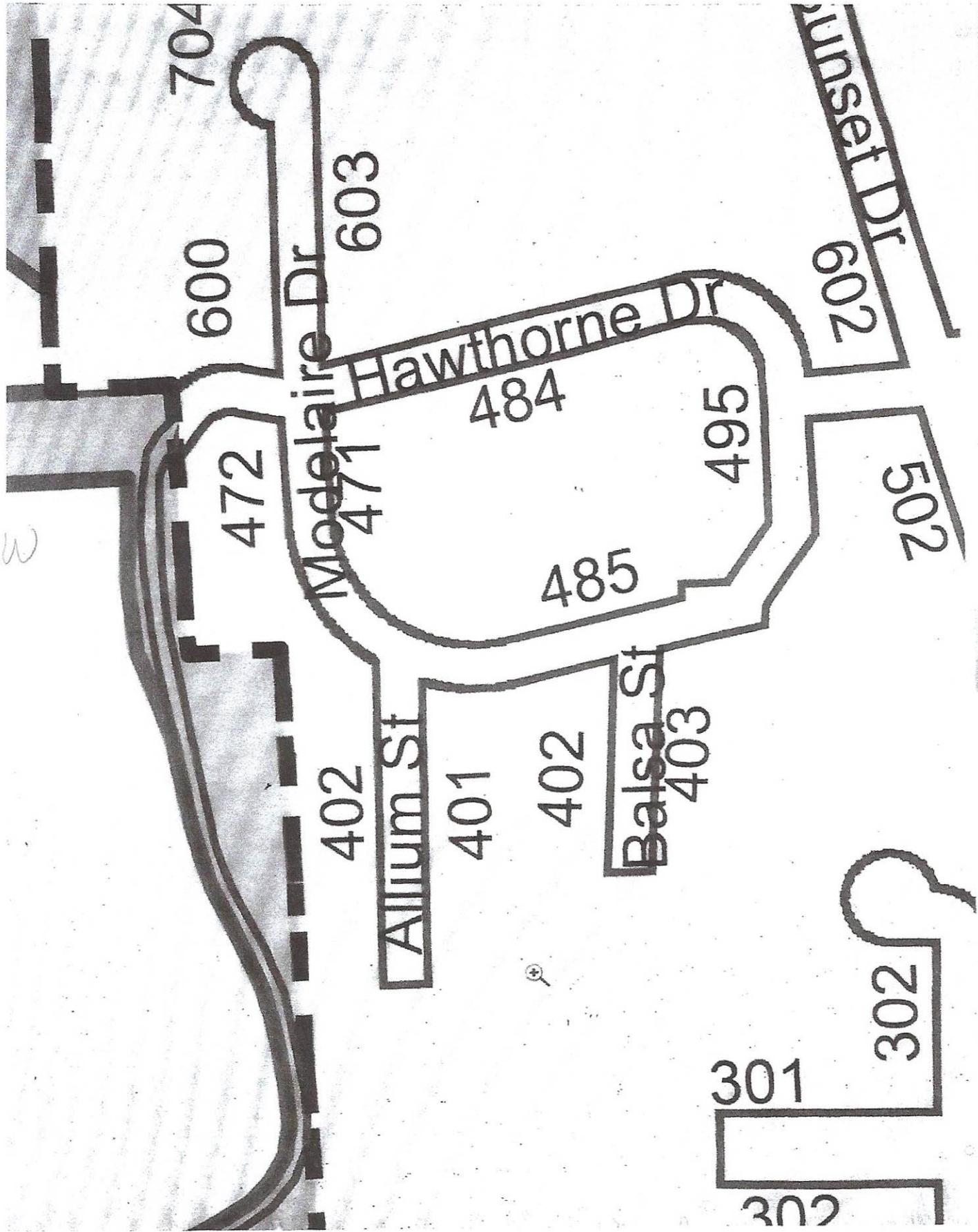
The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

<sup>3</sup>These right-of-way width ranges are for new streets.

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

<sup>5</sup> 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



W

E

S

## Public Services

### OAR 345-022-0110

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

## Waste Minimization

### OAR 345-022-0120

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

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

## Need for a Facility

### OAR 345-023-0005

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

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>proposed helipad is a necessary supporting facility.</p> <p>The project construction has two major road systems through La Grande that are proposed for this project – Morgan Lake Road via Gekeler Lane, 'C' Avenue, Walnut Street, and on up Morgan Lake Road. Roads along these routes are used by the ambulance service for accessing the hospital, the public transit system on its normal daily route, citizens to access locations within and outside this area and also for the school busing system for transporting kids to the La Grande Middle School, La Grande High School and Central Elementary School. In addition to the vehicular modes of travel, those routes are heavily used by bicyclists and pedestrians. The other route that would be utilized is the same route with the exception of turning onto Sunset Drive and up Hawthorne Street to a private gravel road that heads up the area above Deal Canyon. Two other routes that are not addressed but that would be obvious access routes for construction would be South 12th Street and South 20th Street. As a general rule, City streets are built with ninety degree angles, which may restrict some</p> <p>To address the City's concerns regarding traffic and road use within the city's limits, Idaho Power has added the following proposed conditions to Exhibit K:</p> <p><i>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:</i></p> <p><i>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 ASG Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i></p> <p><i>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</i></p> <p><i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i></p> <p><i>Land Use Condition 26: During construction in Union County, the site certificate holder shall conduct all work in compliance with the Union County-specific</i></p>
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**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.

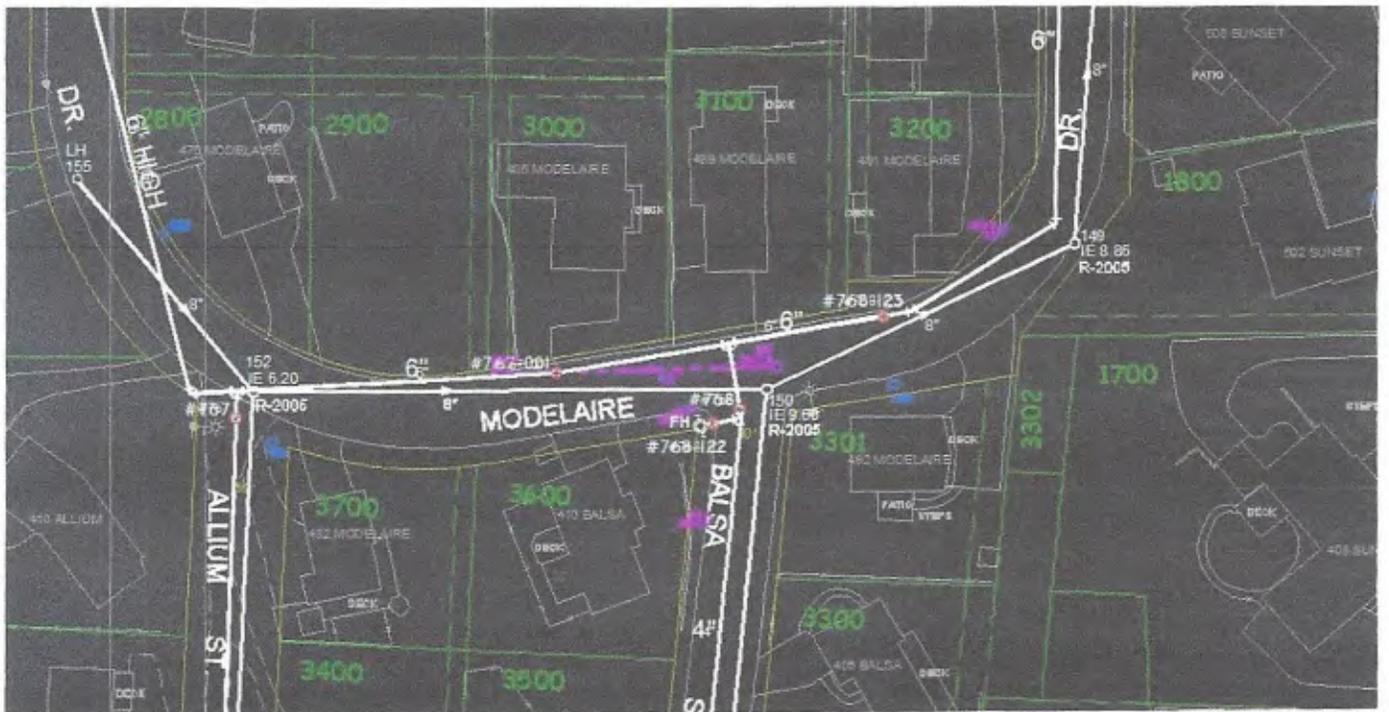
*Kyle Carpenter, PE*  
**Public Works Director**  
**City of La Grande**  
**Public Works**  
 Ph: (541) 962-1325  
 Fax: (541) 963-4844

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 tips 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
<b>Totals</b>	–	–	<b>620</b>	–	–	<b>188</b>

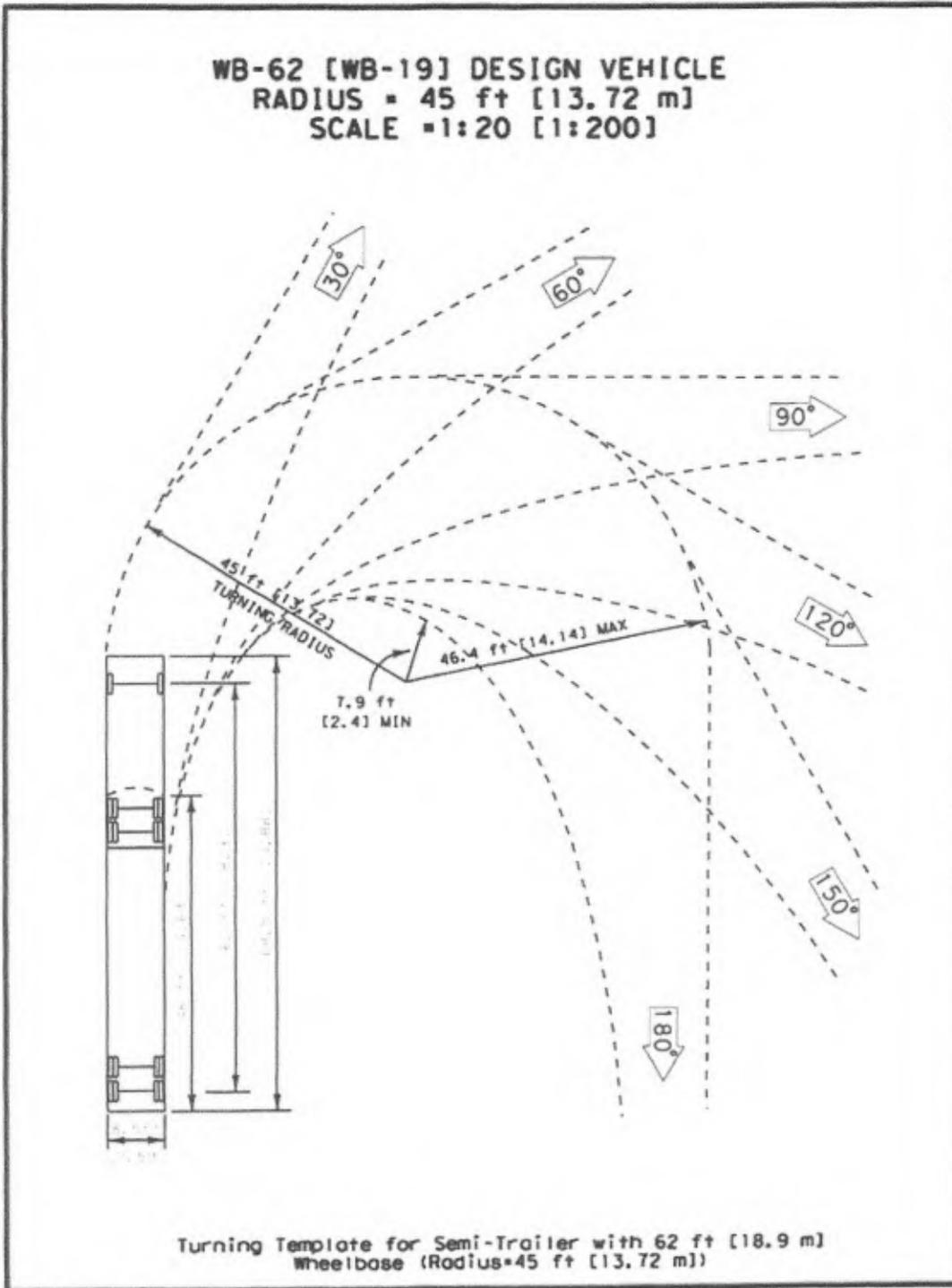


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

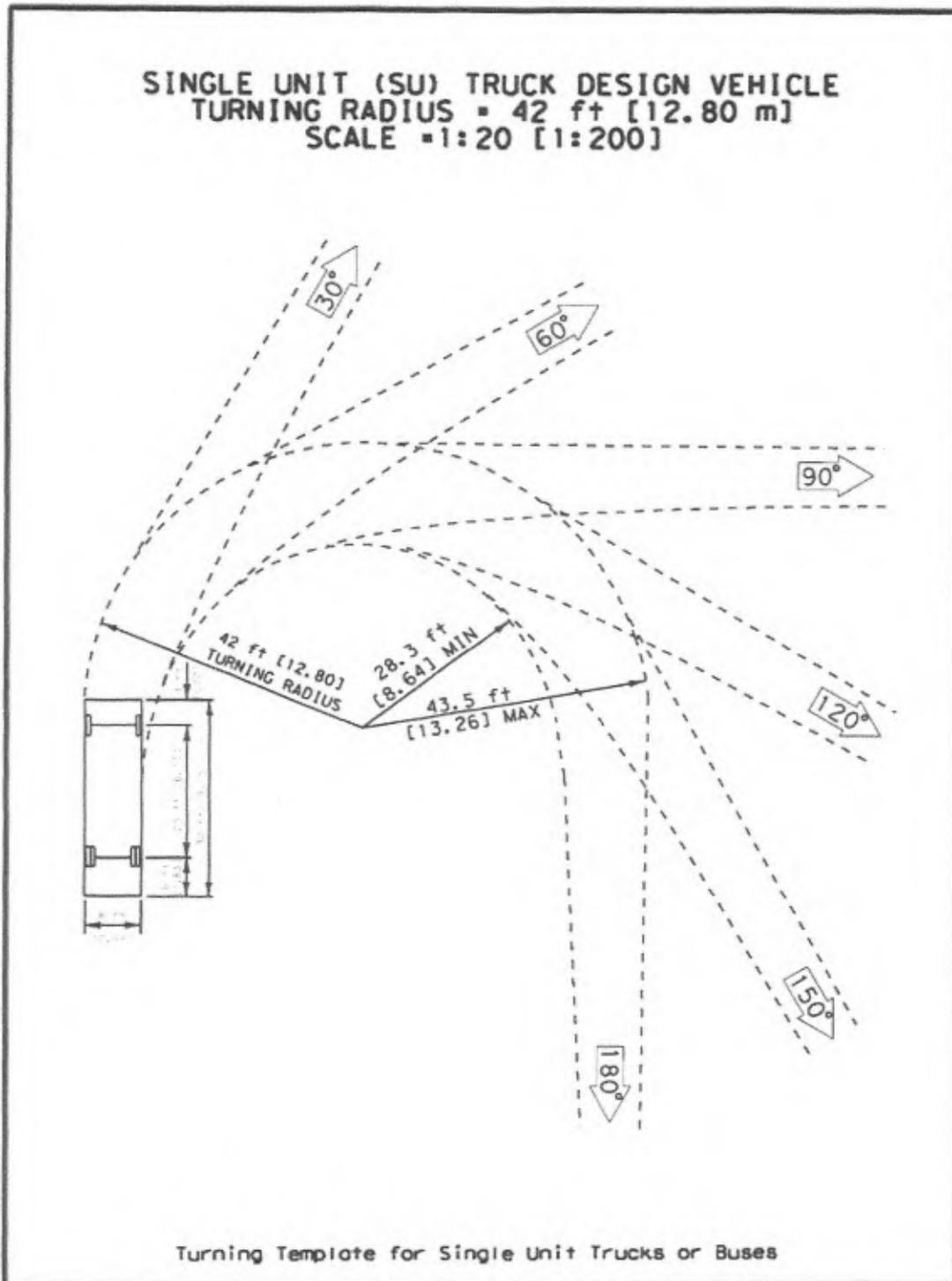


Exhibit 15

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

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

THE CITY OF LA GRANDE ORDAINS AS FOLLOWS:

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

**Section 2.** APPLICABILITY OF STATE TRAFFIC LAWS.

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

**Section 3.** DEFINITIONS

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

a. Alley

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

b. Bicycle

A bicycle is a vehicle that:

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

c. Bicycle Lane

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

d. Bicycle Path

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

e. Block

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

f. Central Business District

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

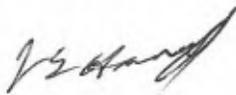
**Section 17. TRUCK ROUTES**

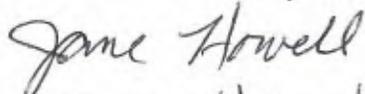
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

**Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES**

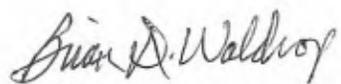
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

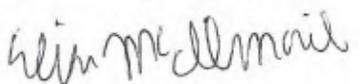
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SIGNATURE   
PRINTED NAME James E. Howell II  
ADDRESS 482 Modelaire Dr  
EMAIL jinhowell2@frontier.com

SIGNATURE   
PRINTED NAME Jane Howell  
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SIGNATURE   
PRINTED NAME Lisa Waldrop  
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EMAIL ldjw62@gmail.com

SIGNATURE   
PRINTED NAME BRIAN D. WALDROP  
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EMAIL bdwaldrop58@gmail.com

SIGNATURE   
PRINTED NAME ELISE McILMAIL  
ADDRESS 476 MODELAIRES DR.  
EMAIL mcilmail151@hotmail.com

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

  
Jessie Huxell  
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

  
C Huxell  
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CHRIS Huxell @ EMAIL.COM

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Marie Skinner  
Marie Skinner  
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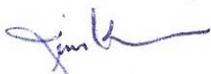
ADDRESS

EMAIL

Blake Bars  
Blake Bars  
1101 G Ave La Grande  
blakebars@gmail.com

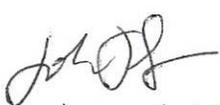
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SIGNATURE   
PRINTED NAME D. Dale Mammen  
ADDRESS 405 BRISA, La Grande, Or  
EMAIL d mammen @ eoni. com

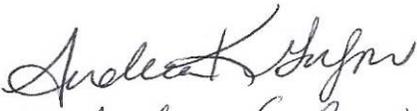
SIGNATURE   
PRINTED NAME Jim Kreider  
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La Grande, OR 97850  
EMAIL jkreider@campblackdog.org

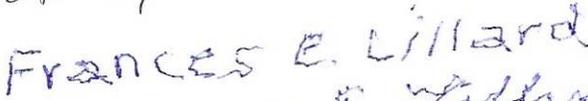
SIGNATURE   
PRINTED NAME Judie Arritola  
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SIGNATURE   
PRINTED NAME Pasco Arritola  
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SIGNATURE   
PRINTED NAME JOHN BARLITZ  
ADDRESS 484 HAWTHORNE LG, OR 97850  
EMAIL

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SIGNATURE   
PRINTED NAME Andrea Gulzow  
ADDRESS 486 Hawthorne DR, LA Grande  
EMAIL foreverfamily33@aol.com

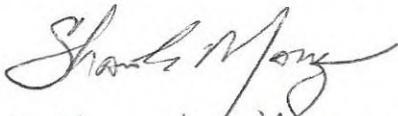
SIGNATURE   
PRINTED NAME Frances E. Lillard  
ADDRESS 471 Modelaire Dr. L.G.  
EMAIL

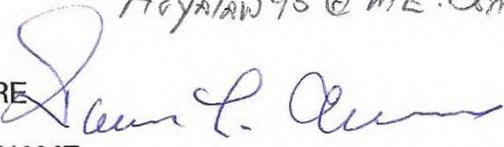
SIGNATURE   
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ADDRESS 410 Allium St  
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SIGNATURE   
PRINTED NAME M. Jeannette Smith  
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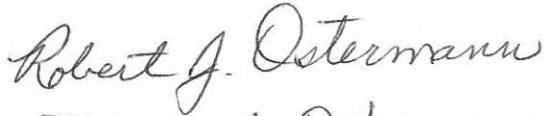
SIGNATURE   
PRINTED NAME KIMBERLEY HEITSTUMAN  
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850  
EMAIL kimheitstuman@hotmail.com

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SIGNATURE:   
PRINTED NAME Shawn K. Mangum  
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EMAIL Hoyalan95@ME.com

SIGNATURE   
PRINTED NAME  
ADDRESS Connie L. Allen 541-9637720  
410 Balsa Street LaGrande, Oregon 97858  
EMAIL N/A

SIGNATURE   
PRINTED NAME Linda M. Snyder  
ADDRESS 491 Modelaire  
EMAIL

SIGNATURE   
PRINTED NAME Robert J. Ostermann  
ADDRESS 495 Modelaire Dr. La Grande, OR 97850  
EMAIL

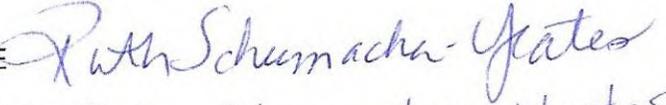
SIGNATURE   
PRINTED NAME Robin J. Ostermann  
ADDRESS 495 Modelaire Dr La Grande, OR 97850  
EMAIL

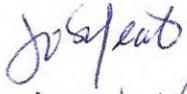
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SIGNATURE   
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SIGNATURE   
PRINTED NAME Robin Stedfeld  
ADDRESS 485 Modelaine Dr. La Grande  
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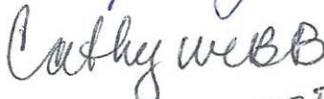
SIGNATURE   
PRINTED NAME Rita Allen  
ADDRESS 410 Balsa St. La Grande Or.  
EMAIL

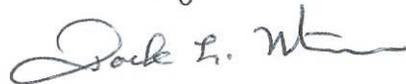
SIGNATURE   
PRINTED NAME Ruth Schumacher Yeates  
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SIGNATURE   
PRINTED NAME JOHN YEATES  
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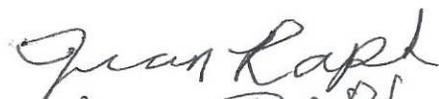
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SIGNATURE   
PRINTED NAME LOIS BARRY  
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SIGNATURE   
PRINTED NAME CATHY WEBB  
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EMAIL thunkski@gmail.com

SIGNATURE   
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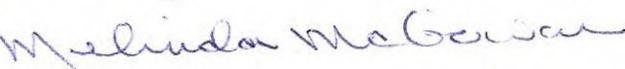
SIGNATURE   
PRINTED NAME GERALDINE BRASETH-PALMER  
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EMAIL 

SIGNATURE   
PRINTED NAME Jean RAPH  
ADDRESS 1509 MADISON AVE LaGrande, OR 97850  
EMAIL Jraph19@gmail.com

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SIGNATURE   
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PRINTED NAME Coy Sexton  
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PRINTED NAME Keith D. Hudson  
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SIGNATURE   
PRINTED NAME Laura Elly Hudson  
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EMAIL ellyhudson@gmail.com

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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  
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SIGNATURE *Anne G. Cavinato*  
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SIGNATURE *Joe Horst*  
PRINTED NAME JOE HORST  
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SIGNATURE *Angela Sherer*  
PRINTED NAME ANGELA Sherer  
ADDRESS 91 W. Hawthorne Dr. La Grande, OR 97850  
EMAIL asherer@frontier.com

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SIGNATURE *Robert J. Sherer*  
PRINTED NAME Robert J. Sherer  
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SIGNATURE *Heather M. Null*  
PRINTED NAME Heather M. Null  
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SIGNATURE *Bert R. Freewing*  
PRINTED NAME Bert R. Freewing  
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EMAIL jeanfreewing@gmail.com

SIGNATURE *Lindsey McCullough*  
PRINTED NAME Lindsey McCullough  
ADDRESS 406 Balsa St., La Grande, OR 97850  
EMAIL lindz\_mm91@hotmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

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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*  
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SIGNATURE *Bruce C Kevan*  
PRINTED NAME *Bruce C Kevan*  
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SIGNATURE *Carol S. Summers*  
PRINTED NAME CAROL S. SUMMERS  
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EMAIL carolsummers1935@gmail.com

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

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

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

## TARDAEWETHER Kellen \* ODOE

---

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that 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.<sup>10</sup>  
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. <sup>11</sup>

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

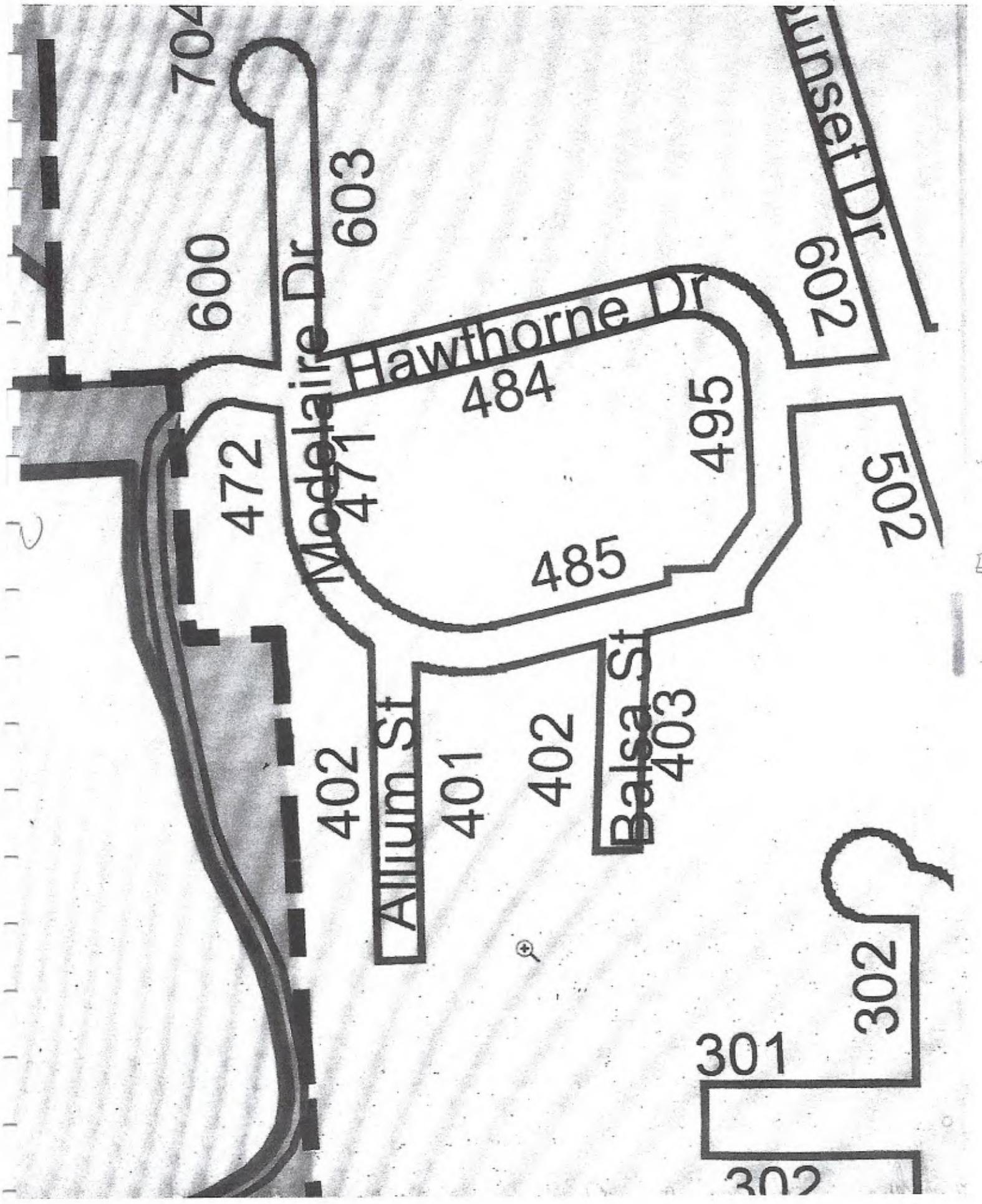
Sincerely,



Virginia L. Mammen  
405 Balsa  
La Grande, Oregon 97850

gmammen@eoni.com

N



### 3.3 Predicted Noise Levels

1 OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation  
2 of the proposed facility.  
3

#### 3.3.1 Construction Noise

##### 3.3.1.1 Predicted Construction Noise Levels

4 Project construction will occur sequentially, moving along the length of the Project route, or in  
5 other areas such as near access roads, structure sites, conductor pulling sites, and staging and  
6 maintenance areas. Overhead transmission line construction is typically completed in the  
7 following stages, but various construction activities may overlap, with multiple construction  
8 crews operating simultaneously:  
9

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

14 The following subsections discuss certain construction activities that will periodically generate  
15 audible noise, including blasting and rock breaking, implosive devices used during conductor  
16 stringing, helicopter operations, and vehicle traffic.  
17

##### **Blasting and Rock Breaking**

18 Blasting is a short-duration event as compared to rock removal methods, such as using track rig  
19 drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills.  
20 Modern blasting techniques include the electronically controlled ignition of multiple small-  
21 explosive charges in an area of rock that are delayed fractions of second, resulting in a total  
22 event duration that is generally less than a second. Impulse (instantaneous) noise from blasts  
23 could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.  
24

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

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

##### **Implosive Devices**

34 An implosive conductor splice consists of a split-second detonation with sound and flash.  
35 Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be  
36 developed by an individual certified and licensed to perform the work. The plan will  
37 communicate all safety and technical requirements including, but not limited to, delineation of  
38 the controlled access zone and distance away from residences.  
39

**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](http://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.



## Department of Environmental Quality

### Chapter 340

#### Division 35

#### NOISE CONTROL REGULATIONS

##### 340-035-0035

##### Noise Control Regulations for Industry and Commerce

###### (1) Standards and Regulations:

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

###### (b) New Noise Sources:

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

###### (B) New Sources Located on Previously Unused Site:

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

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

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

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

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

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

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

(3) Measurement:

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

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

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

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

(4) Monitoring and Reporting:

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

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

(A) Access to the site;

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

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

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

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

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

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

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

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

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

(g) Sounds that originate on construction sites.

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

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

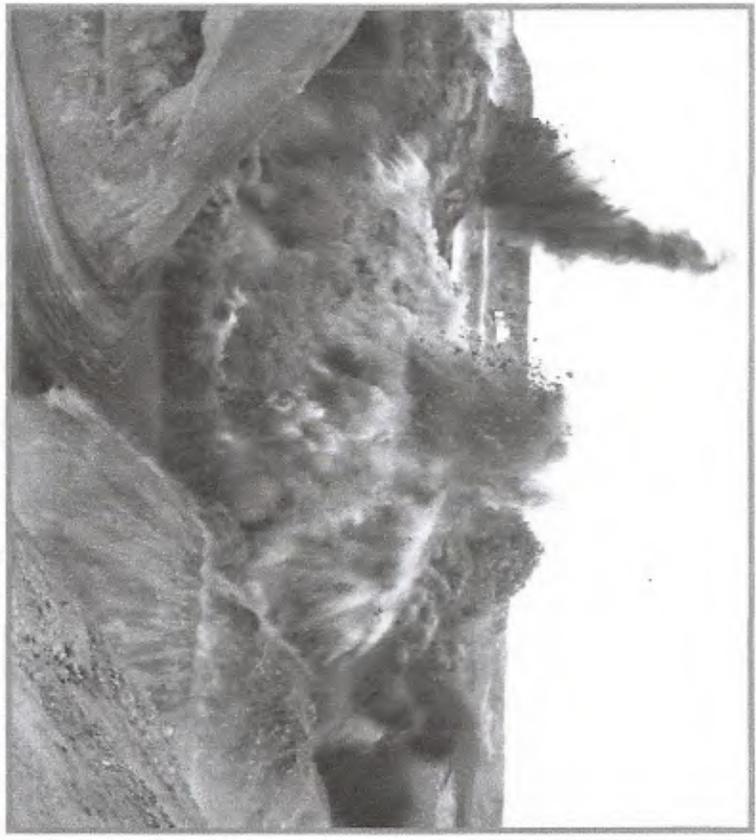
(j) Sounds generated by the operation of aircraft and subject to pre-emptive federal regulation. This exception does not apply to aircraft engine testing, activity conducted at the airport that is not directly related to flight operations, and any other activity not pre-emptively regulated by the federal government or controlled under OAR 340-035-0045;

# Controlling the Adverse Effects of Blasting

This module addresses the control of offsite impacts that result from blasting, namely:

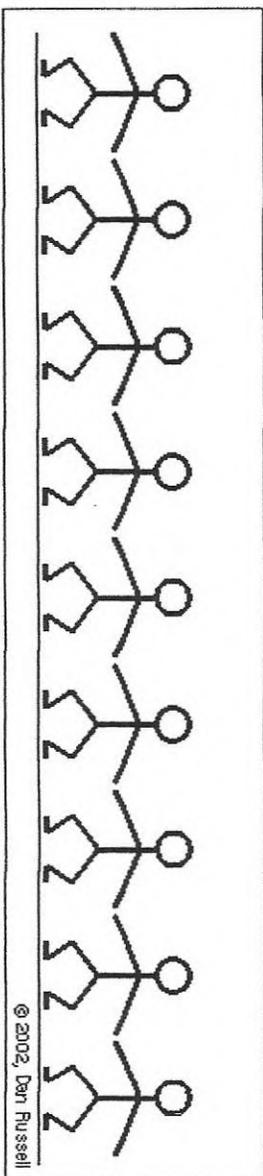
- vibrations,
- airblast, and
- flyrock.

Much of the information in the module is derived from the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The performance standards apply to all surface coal mines. Similar standards have been adopted on some State and local levels and applied to non-coal blasting operations such as quarrying and construction.



## Part I: Ground Vibrations, Airblast, and Flyrock

Explosive energy is used to break rock. However, the use of this energy is not 100-percent efficient. Some of the energy escapes into the atmosphere to generate **airblast or air vibrations**. Some of the energy also leaves the blast site through the surface soil and bedrock in the form of **ground vibrations**.



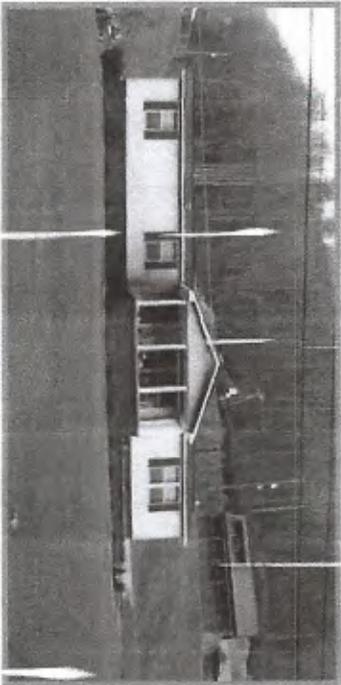
Both air and ground vibrations create waves that disturb the material in which they travel. When these waves encounter a structure, they cause it to shake. Ground vibrations enter the house through the basement and airblast enters the house through the walls and roof.

Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior noise" will alarm and startle people living in the house.

**Flyrock** is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.

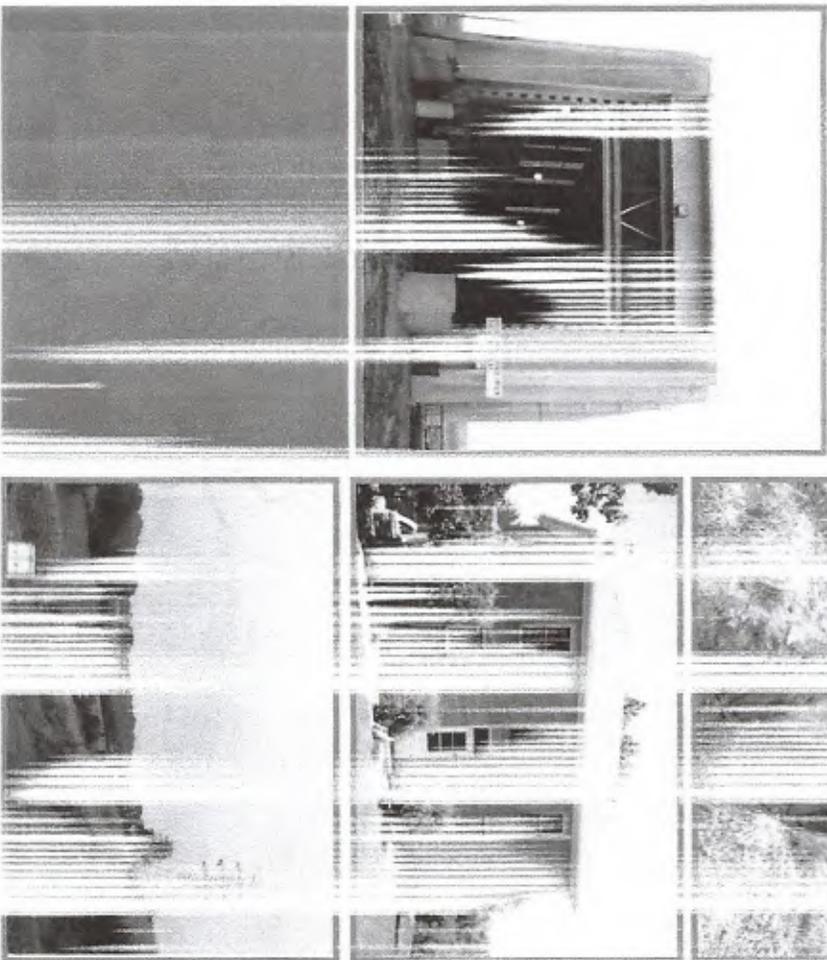
# Blasting Impacts on Structures

Both above-ground and below-ground structures are susceptible to vibration impacts. Structures can include onsite mine offices and buildings, as well as offsite residences, schools, churches, power-transmission lines, and buried pipelines. Some of these structures may include historic or cultural features sensitive to even low levels of vibrations.



It is important to understand:

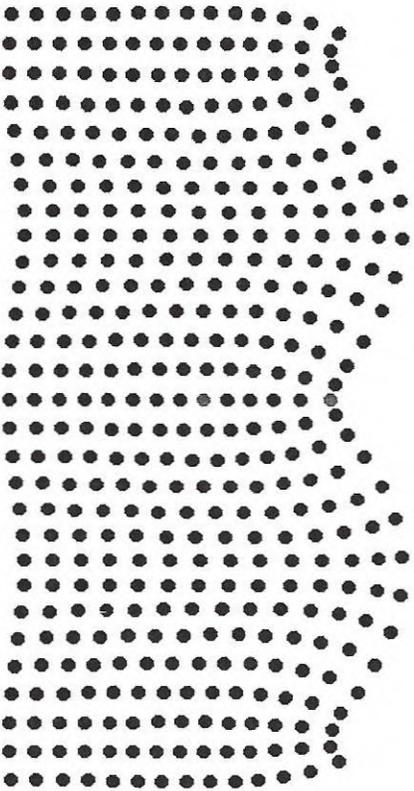
1. the causes of ground vibrations and airblast, and
2. what practices can be followed to control and minimize the adverse effects



## Ground Vibrations

---

Ground vibrations propagate away from a blast site as Rayleigh (or surface) waves. These waves form a disturbance in the ground that displaces particles of soil or rock as they pass by. Particle motions are quite complicated. At the ground surface (free boundary), measured particle motions have the greatest displacements, and displacements decrease with depth (see the illustration below). At a depth of between 20 to 50 feet below ground surface, particle displacements are barely detectable. Structures that are well coupled to the ground tend to move with this motion; structures buried in the ground are less affected by surface motions.



©1999, Daniel A. Russell

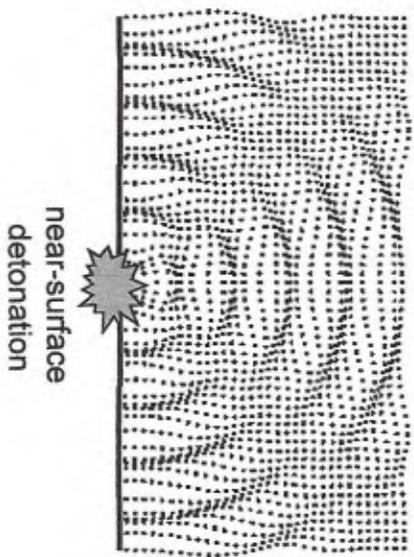
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

# Airblast

Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or inaudible. Elevated airblast levels are generated when explosive energy in the form gases escape from the detonating blast holes. Energy escapes either through the top stemming or through fractures in the rock along the face or at the ground surface.



Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

Both ground vibrations and airblast cause structures to shake structures. Occupants in structures that are located far from a blast may experience shaking from vibration and airblast as two separate, closely spaced events. This can be particularly bothersome, as it prolongs the duration of structure shaking and leads the property owner to think that two separate blasts occurred.

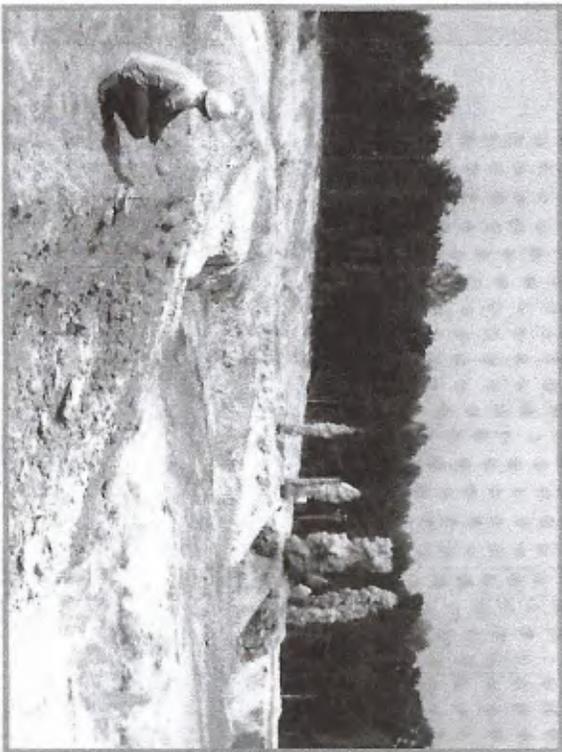


Exhibit 5

# Structure Response

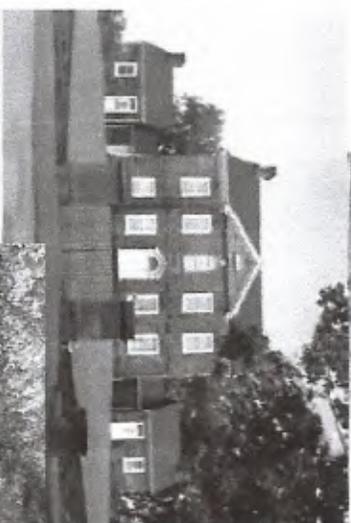
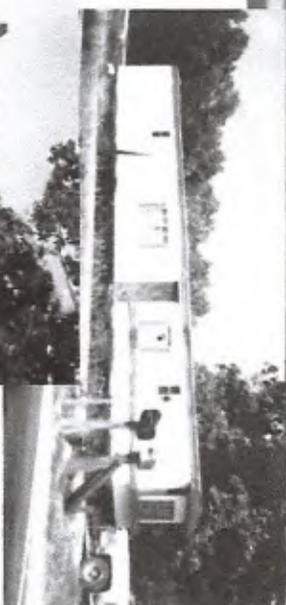
As ground and air vibrations reach a structure, each will cause it to shake. Structure response is dependant on the vibration characteristics (frequency and amplitude) and structure type.

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

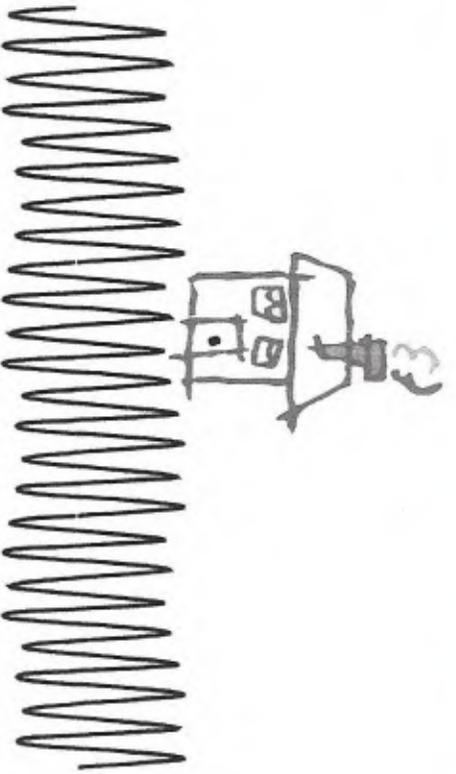
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

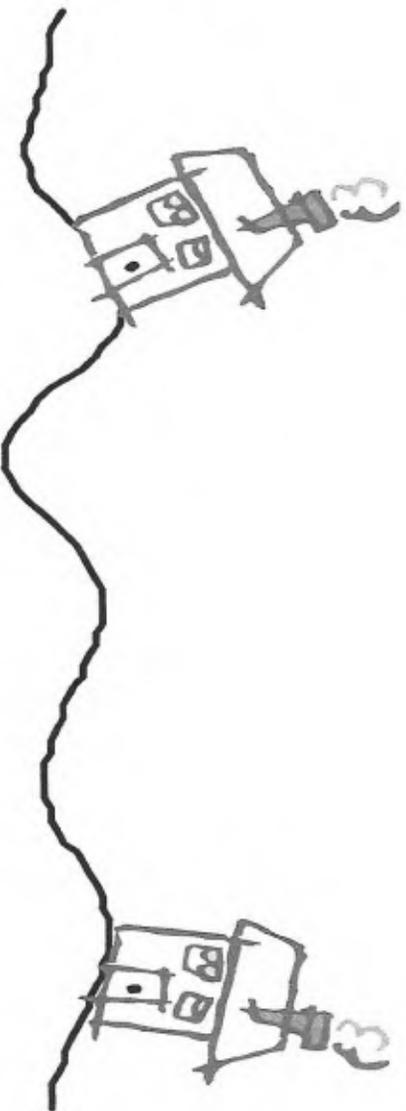


# Ground Vibration Structure Response

Exhibit 59



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.



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.



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## A noisy problem

**People often become more sensitive to noise as they age, which can affect their mental and physical health.**

Published: March, 2019



Image: © Juanmonino/Getty Images

Are you more sensitive to noises than you used to be? Do certain sounds now feel too loud and jarring? Don't worry; it's actually quite normal.

Age-related hearing loss is common among older adults and affects about two-thirds of men in their 70s and 85% of men ages 80 and older. Although it's not clear why, this can also make people hypersensitive to sounds that they used to tolerate easily, which in turn can affect their well-being.

"Exposure to noises from crowds, traffic, and other everyday sounds can become harder to tolerate and increase stress levels, leading to anxiety and a reduction in overall quality of life," says Dr. Stephanie Tompkins, an audiologist with Harvard-affiliated Massachusetts Eye and Ear. "As your sensitivity to noises increases, this can lead to greater isolation, too, as you may try to avoid potentially noisy places and situations."

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Quiet in the Hospital: How Noise...

## Quiet in the Hospital: How Noise Reduction Helps Patients Heal

on June 7, 2018 (<https://medcenterblog.uvmhealth.org/innovations/hospital-noise-reduction/>) in Innovation (<https://medcenterblog.uvmhealth.org/category/innovations/>) by UVM Medical Center (<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.

## References:

Deardorff, J. (2011). Chicago Tribune.com. Chicago Tribune, Health. Hospitals drowning in noise. Retrieved from [http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424\\_1\\_hospitals-neonatal-intensive-care-unit-noise](http://articles.chicagotribune.com/2011-04-24/health/ct-met-hospital-noise-20110424_1_hospitals-neonatal-intensive-care-unit-noise)

Garcia, J. (2012). Medscape.com. Medscape Today, News. Hospital Noise Results in Significant Patient Sleep Loss. Retrieved from <http://www.medscape.com/viewarticle/756575>

Sciencedaily.com. (2005). Rise In Hospital Noise Poses Problems For Patients And Staff. Retrieved from <http://www.sciencedaily.com/releases/2005/11/051121101949.htm>

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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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*Front Psychol.* 2013; 4: 578.

PMCID: PMC3757288

Published online 2013 Aug 30. doi: [10.3389/fpsyg.2013.00578](https://doi.org/10.3389/fpsyg.2013.00578)

PMID: [24009598](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.

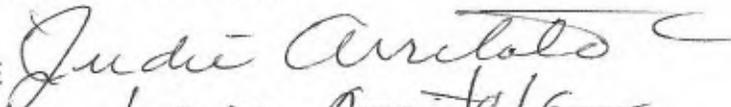
Where to begin?

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.

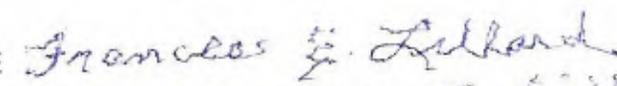


I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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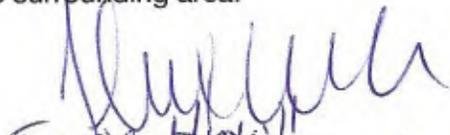
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ADDRESS

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Jessie Huxoll

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PRINTED NAME

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Brent H Smith

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M. Jeannette Smith

410 Allium Street

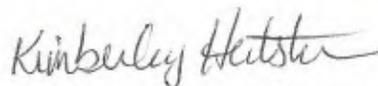
jeannettecupton@gmail.com

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KIMBERLEY HEITSTUMAN

2409 CENTURY LP, LABRANDE, OR 97850

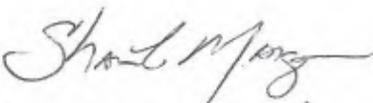
kimheitstuman@hotmail.com

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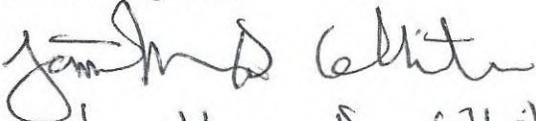


Shawn K. Mangum

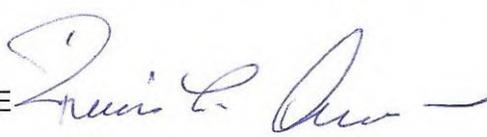
2409 E. M. Ave.

Hoya/kw95@me.com

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SIGNATURE   
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SIGNATURE *Robin J. Ostermann*  
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EMAIL

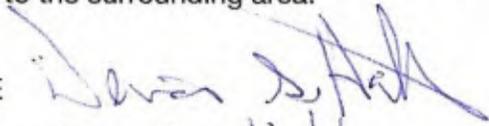
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SIGNATURE *Ruth Schumacher Yeates*  
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SIGNATURE



PRINTED NAME

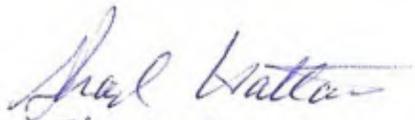
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SIGNATURE



PRINTED NAME

Shad Hattan

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hattansl88@gmail.com

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PRINTED NAME

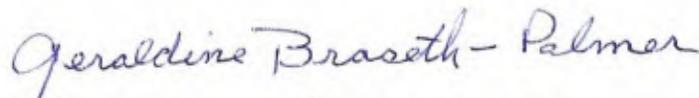
Jack L. Martin

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SIGNATURE



PRINTED NAME

GERALDINE BRASETH-PALMER

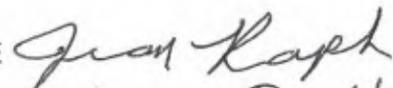
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Jean RAPH

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PRINTED NAME JOE HORST  
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MERLE E COMFORT

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Caroline Kaye Juniper

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EMAIL

SIGNATURE

*Gerald D. Juniper*

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Gerald Darwin Juniper

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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Robert J. Sherer*  
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EMAIL jeanfreewing@gmail.com

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

SIGNATURE  
PRINTED NAME  
ADDRESS  
EMAIL

**ESTERSON Sarah \* ODOE**

---

**From:** Buck Pilkenton <buck48@eoni.com>  
**Sent:** Wednesday, August 21, 2019 10:04 PM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Stop B2H

B2H.BPOC,

Eastern Oregon and Greenland have at least two things in common. Lots of open space and no desire to turn it over to an occupier. The proposed B2H is an avaricious, asinine, amoral insult to the people, geography and culture of the affected area. Do not allow this inefficient, obsolete, and just plain ugly monstrosity to foul Oregon's land. The virtues of stopping B2H trump the meager and false benefits claimed by its pushers.

Thank you,

Buck Pilkenton

39203 Deer Creek Road

Sumpter Valley Oregon 97877

541 894 2527

**TARDAEWETHER Kellen \* ODOE**

---

**From:** Ryan Neal <RyanN@portofmorrow.com>  
**Sent:** Friday, June 14, 2019 8:50 AM  
**To:** B2H DPOComments \* ODOE  
**Subject:** Public Comments B2H  
**Attachments:** B2H Letter of Support Energy Site Council 6-14-19.pdf

Good Morning,

Attached you will find public comment for upcoming comment period for B2H project from the Port of Morrow. Thank you for your time.

**Ryan Neal**

Executive Director



T: 541-481-7678  
M: 541-371-1546  
F: 541-481-2679  
[ryann@portofmorrow.com](mailto:ryann@portofmorrow.com) -  
[www.portofmorrow.com](http://www.portofmorrow.com)  
2 Marine Dr. PO Box 200 • Boardman OR,  
97818

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Members of the Energy Facility Siting Council:

Reliable, economic power is crucial to the continued success of the Port of Morrow. Over the years, we've relied on a plentiful power supply to attract data centers and other electricity-intensive businesses to the port.

We need the Boardman to Hemingway (B2H) transmission line to keep the momentum going. B2H will provide enough capacity to ensure our local businesses can grow and new ones can be built, providing jobs and improving the economic future of our state and region.

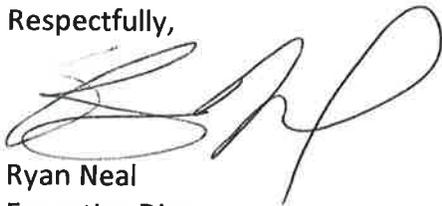
Existing lines have paved the way for the Port of Morrow's success. But their capacity is limited, and they can't carry any more energy in peak times. B2H will give us a direct connection to up to 1,000 megawatts of power and free up capacity on the existing lines. Besides connecting us to power generated in the Pacific Northwest and Mountain West, it will give us access to surplus solar power in the Southwest.

The importance of this project to the Port of Morrow's sustained prosperity, which helps keep Oregon's economy on track, cannot be overstated.

Please take this benefit into consideration when making your decision on a site certificate for Boardman to Hemingway.

Thank you and please contact me with any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ryan Neal', written over a faint, illegible stamp or background.

Ryan Neal  
Executive Director



# 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) Timothy C. Proesch

Mailing Address (mandatory) 2104 Owyhee Lake Road  
P.O. Box 2588 Nyssa, OR 97913

Phone Number (optional) (971) 270-4479 Email Address (optional) owyheecassis@gmail.com

Today's Date: June 18 2019

Do you wish to make oral public testimony at this Hearing: Yes  No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst  
Oregon Department of Energy  
550 Capitol Street NE  
Salem, OR 97301  
Fax: 503-378-6457  
Email: [B2H.DPOComments@oregon.gov](mailto: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.)

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Page 50

1 HEARING OFFICER WEBSTER: Thank you for your  
 2 comment. Thanks.  
 3 Next we'll hear from Mr. -- I can't tell if  
 4 it's a "P" or an "F." Is it Froesch or Proesch?  
 5 Following Mr. Proesch we will hear from JoAnn  
 6 Marlette.  
 7 MR. TIMOTHY PROESCH: My name is Timothy  
 8 Proesch. I live at 2104 Lake Owyhee Road, which is a  
 9 Nyssa address also but closer to Adrian, as the Fosses  
 10 as well. So if you guys, you've been on your map and  
 11 looked at section 13 and tower 255/4. So I purchased  
 12 this property in November of last year. This was just  
 13 brought to my attention not even 2 weeks ago that you  
 14 guys have proposed to the previous owner that you guys  
 15 had an agreement with them to survey this land to put  
 16 this in. So if you look at this section 13, not only  
 17 are you guys putting a tower on my proposed new home  
 18 site, you guys are also wanting to use an existing road  
 19 that I use to access my irrigation for the whole  
 20 property, which is 113.7 acres.  
 21 Nobody from Idaho Power, nobody from Oregon  
 22 Department of Energy has contacted me. The last time  
 23 there was even a title search done on this property,  
 24 knowing it was on the market, was May of last year. So  
 25 we're looking at year and a half that you guys haven't

Page 51

1 done any due diligence to continue to see, knowing this  
 2 property was on the market. And now I feel like I'm  
 3 being forced into allowing this to transpire because  
 4 this is your guys' proposed route.  
 5 So I am not obligated to continue to follow  
 6 the contractual agreement that you guys had with the  
 7 previous owner for the surveying of this land. I  
 8 purchased this property outright from the previous  
 9 owner; there's no bank loan or anything on this  
 10 property.  
 11 And so I have come ill-prepared for this  
 12 meeting because I just found out about this, and I have  
 13 not been contacted by anybody; not Idaho Power, like I  
 14 said, not Oregon Department of Energy, nobody. This was  
 15 brought to light to me by my neighbors. They said, Do  
 16 you know about this? I said, No, absolutely not, nobody  
 17 has contacted me whatsoever regarding this issue. But  
 18 yet, the proposed route runs right through my property  
 19 with the tower and an access road which is going to take  
 20 up a huge chunk of my land.  
 21 So there's several issues that I am going to  
 22 bring to your guys' attention in my formal written to  
 23 you guys because, like I said, this was just brought to  
 24 my attention. But to have this not discussed with me  
 25 through any kind of proper channels and not doing a

Page 52

1 continued property search and title search on these  
 2 properties that impact private land, I think is kind of  
 3 an oversight that needs to be addressed. Because now  
 4 here I am owning this property for almost a year now and  
 5 not been contacted whatsoever regarding this, but yet,  
 6 your proposed site runs right on my property, and then  
 7 your lines are going to drape from my property and my  
 8 new proposed home site across that pivot that Mr. Foss  
 9 discussed previously.  
 10 So I mean, I haven't seen another map; I just  
 11 have the map that was presented to me by Idaho Power  
 12 yesterday. I talked to a representative from Idaho  
 13 Power yesterday, who came to my house, who showed me the  
 14 detailed map. And I haven't even seen whatever, the  
 15 other map you guys are talking about, Double Mountain.  
 16 So I don't even know how close that infringes on my  
 17 property.  
 18 But to have this just being brought to light  
 19 and you guys want to move forward with this project, is  
 20 kind of devastating to me, especially for the amount of  
 21 property that I purchased and for the price I purchased  
 22 it for, there's a reason I purchased this property away  
 23 from everything and everybody; not to be impeded on by  
 24 anybody else, especially a big corporation.  
 25 I feel kind of bullied into this whole thing.

Page 53

1 And talking with Idaho Power, we talked about the  
 2 eminent domain also, which I don't feel like is fair to  
 3 somebody who's a private landowner. Especially I  
 4 shouldn't have to follow a contractual agreement you  
 5 guys had with somebody else just for the survey of the  
 6 property. Here it is impeding clear through my  
 7 property, and it's impacting my neighbors and everybody  
 8 around me.  
 9 I have future plans for development for this  
 10 land, not just to have Idaho Power take up the majority  
 11 of my land. Like I said, if you zoom in on this, you  
 12 guys are taking up a huge chunk of my property. The  
 13 biggest chunk of my property that I have, which is like  
 14 88.8 acres, you guys are going to drive right through  
 15 the middle of it to access your guys' tower and then  
 16 your tower is going to be on my property, on my new  
 17 proposed home site that I've been planning since I  
 18 bought this property a year ago.  
 19 And to just have this brought to me, it wasn't  
 20 even brought to me through the proper channels, it was a  
 21 concerned neighbor that was concerned because he knew my  
 22 future plans and knew what I had done and how much money  
 23 and how much capital I have invested in doing this.  
 24 This is my life savings. Yes, I'm younger than most of  
 25 these people that are speaking out about this, but it's

Page 54

1 not from not doing my due diligence of the zoning of  
 2 this property to be developed, and coming up with that  
 3 kind of money to purchase a property of that magnitude.  
 4 I think that all of these things should be  
 5 considered, especially when encroaching on private land,  
 6 because it does impact us, everybody around us. And I  
 7 know you guys have been working on this project for a  
 8 long time, but I think there needs to be some other  
 9 proposed routes instead of encroaching on private land,  
 10 especially when we pay for this land, we've purchased  
 11 this land, not to be encroached on, not to be bullied  
 12 into doing something that a corporation wants to do  
 13 because it's convenient for them to transfer power to  
 14 other places.  
 15 After talking to the representative from Idaho  
 16 Power, he basically told me that you guys are just going  
 17 to pump a bunch of power through there to Portland. How  
 18 does that benefit me? There is no benefit to any of us  
 19 for this proposed line. None. I'm not getting more  
 20 power, I'm not getting anything from it other than it  
 21 being a nuisance and it impacting us tremendously.  
 22 Also with the electromagnetic field that it  
 23 produces, I have four babies. If BLM wants all these  
 24 studies done to be able to run through BLM land, how it  
 25 impacts nature and the environment and the waterways,

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1 how does it impact my family and my children, my future?  
 2 This is already -- the reason we purchased the  
 3 property the way we did is to put it into a trust to  
 4 never be sold after it's developed, for it to stay in  
 5 the family to create a legacy. Not to have some power  
 6 lines running through there that, who knows. I mean,  
 7 you guys have been working on this 10 years. Are you  
 8 guys going to change it again in 10 years and want to  
 9 put more there? Am I slowly just going to get closed in  
 10 on? There's been no definitive answers to these  
 11 questions that I've asked. Like I said, I've never been  
 12 contacted by any representatives; I had to contact Idaho  
 13 Power to talk to them. Nobody has contacted me except  
 14 for my neighbors.  
 15 So I feel this was a big oversight on your  
 16 guys' part by not contacting me as the landowner. Like  
 17 I said, I put everything, my whole life savings into  
 18 this property and I want to continue to do that, but at  
 19 this juncture, I mean, it's a major devastating loss for  
 20 me financially if this continues to happen because it  
 21 impedes a lot of my property.  
 22 And I told the representative from Idaho Power  
 23 that I'm definitely not comfortable with this situation.  
 24 I mean, there's no open communication other than me  
 25 contacting them and having them come to my house.

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1 And it's not every day that a property of this  
 2 size is purchased in Malheur County for the intentions  
 3 that we have, which I can go into in my written  
 4 statement. But I'm wanting this to be something for  
 5 everybody to enjoy. We have multiple things going on.  
 6 There are tons of wildlife, tons of geothermal activity.  
 7 I have four geothermal wells on this property that can  
 8 be utilized for multiple purposes.  
 9 The whole intention of this was to create  
 10 something for Malheur County, for the people here; not  
 11 just myself and not just capitalizing on this potential  
 12 that it has. But the road to the lake goes right  
 13 through my property. Everybody that goes to the lake  
 14 could enjoy this and be a part of this. I feel it is  
 15 detrimental to that development to have Idaho Power go  
 16 right through my property and then to take up this much  
 17 of my land.  
 18 I worked hard to have the money to be able to  
 19 purchase something of this magnitude. So to have it  
 20 impeded and to have it kind of looking like it's going  
 21 to be diminished to the capacity that nobody's even  
 22 going to want to recreate there. I mean, this is a huge  
 23 recreation area. On top of there's nothing like this  
 24 that's available to the people of this community in  
 25 Malheur County. Not only that, but the tourism that

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1 this whole area draws. I mean, people drive up there  
 2 just to look at that siphon because of the magnitude of  
 3 the siphon. So it's not just the wildlife and our  
 4 property and our neighbors' property, the irrigation  
 5 district sees people using these access roads to see the  
 6 magnitude of something that great.  
 7 And I feel like having this transmission line  
 8 go through there is going to be totally detrimental to  
 9 everything that everybody in our area sees the potential  
 10 in this whole recreation area from the lake clear down  
 11 to the local grocery store that's there. Because if  
 12 this happens, that local grocery store is going to  
 13 suffer also. It's not just one thing or another.  
 14 There's so much that we have to consider in this whole  
 15 thing, and I feel like none of these things are being  
 16 discussed. And yes, there are certain things we should  
 17 put in there as far as how it's going to impact. And I  
 18 understand you guys have your guidelines, but put  
 19 yourself in my shoes. If you just paid this much money  
 20 for 113 acres and then find out, Hey, sorry, we're going  
 21 to take your road away from you and we're going to put a  
 22 tower on your property where you want to build your  
 23 house.  
 24 I think this all needs to be considered. I  
 25 will write up a formal letter to you guys once I do some

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1 more stuff, because like I said, I was very ill-prepared  
 2 for this meeting.  
 3 HEARING OFFICER WEBSTER: Thank you.  
 4 Ms. Marlette.  
 5 MR. JOANN MARLETTE: I'm JoAnn Marlette. I  
 6 reside at 2031 Court Street, Baker City, Oregon. And  
 7 I'm here to speak to you about the surveys for wildlife  
 8 habitat.  
 9 The survey area for wildlife habitat is not  
 10 adequate and the information is not current.  
 11 The survey area for wildlife habitat impacts  
 12 is identified as the siting corridors where the  
 13 transmission line and other developments will be  
 14 constructed. The surveys that were completed were done  
 15 during 2011 through 2014. The material provided is not  
 16 current per ODFW page P1-17 of the application, stating  
 17 the surveys are good for 3 years and the sample size was  
 18 too small on which to base any decisions. Wildlife  
 19 Condition 2 requires preconstruction surveys regardless  
 20 of any prior surveys. The small amount of available  
 21 habitat surveyed and the outdated nature of the surveys  
 22 do not allow a determination that this development  
 23 complies with OAR 345-022-0060.  
 24 This transmission line will span over 300  
 25 miles. Given the lack of information currently

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1 available, and the limited area planned for future  
 2 wildlife surveys, it is not possible to determine  
 3 whether or not the transmission line will be in  
 4 compliance with the above rules. The lack of  
 5 information extending beyond the site borders makes it  
 6 impossible for the developer to know if they are working  
 7 too close to an active raptor nest or whether they  
 8 comply with setback requirements.  
 9 Without a current, up-to-date survey, there  
 10 will be no baseline for impact assessment in order to  
 11 determine how significant the impacts may be and  
 12 determine if they preclude issuance of a site  
 13 certificate.  
 14 I will be providing written comment prior to  
 15 the July 23rd deadline.  
 16 Thank you.  
 17 HEARING OFFICER WEBSTER: Thank you.  
 18 Is there anybody else here that would like to  
 19 give comment this evening? Is there anybody on the  
 20 phone, do we know, that joined us?  
 21 IT PERSON: No.  
 22 HEARING OFFICER WEBSTER: Okay.  
 23 MR. DUSTIN BAKER: I have the form here. I'll  
 24 give it to you. I'll submit some written, too.  
 25 HEARING OFFICER WEBSTER: This is Dustin

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1 Baker. Mr. -- is it Baker?  
 2 MR. DUSTIN BAKER: Baker, yes.  
 3 HEARING OFFICER WEBSTER: Mr. Baker, if you  
 4 could please state your name and your address for the  
 5 record.  
 6 MR. DUSTIN BAKER: My name is Dustin Baker. I  
 7 live at 2340 Rock Springs Canyon Road, about a mile and  
 8 a half north and a little bit west of Jim Foss who  
 9 testified earlier. I'm also a manager of Faith Land  
 10 Company, and we own property on the Malheur River west  
 11 of the irrigated land. And Idaho Power will cross that  
 12 location. At this time their proposed route is across  
 13 that location.  
 14 Regarding the Faith Land Company property,  
 15 Idaho Power has been very good about contacting us, come  
 16 out and visited our location, helped site the towers,  
 17 where they're going to be, consulted with us on the best  
 18 routes for their access roads, and were very thorough in  
 19 that process. So I want to commend them on that.  
 20 However, in regards to the property that we  
 21 own on Rock Springs Canyon Road, the property  
 22 transmission line does not technically cross our  
 23 property; the easement goes across the corner of our  
 24 property. And so the power lines are sited just off of  
 25 our property line. Idaho Power has not contacted us in

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1 regards to that property in any way, had no  
 2 representatives from Idaho Power come and look at that  
 3 proposed siting.  
 4 So my concern is similar to Foss's, is that  
 5 the current proposed route will create additional roads,  
 6 additional access, additional traffic, that we as  
 7 private landowners will need to contend with and deal  
 8 with. In my opinion, if they would have consulted with  
 9 local landowners who know the area more thoroughly in  
 10 this location, we could have helped them locate the  
 11 power line approximately 1 mile directly to the west and  
 12 farther to the south that would have avoided any of the  
 13 exclusive farm use property and been off of private  
 14 property.  
 15 I'm not sure their reasoning for wanting to  
 16 continue to keep the power line as close to private  
 17 property as they can. I don't know if it's easier for  
 18 them to deal with private property owners than it is to  
 19 deal with the BLM, Bureau of Land Management. But in  
 20 this case, they could have done a much better job  
 21 consulting with the local landowners in that specific  
 22 area.  
 23 That's what I'd like to say. Thank you.  
 24 HEARING OFFICER WEBSTER: Thank you.  
 25 Anybody else this evening?

## ESTERSON Sarah \* ODOE

---

**From:** Owyhee Oasis <owyheeoasis@gmail.com>  
**Sent:** Thursday, August 22, 2019 11:14 AM  
**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:** CH. 469 Oregon Legislature with highlighted points.pages; 21S45E1300301\_Survey Results\_20190722.pdf; Owyhee River\_20190821\_v2.pdf

Date: August 22, 2019

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Energy Facilities 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 would like to introduce myself, my name is Timothy Proesch. Our address is 2104 Owyhee lake road Nyssa, Oregon 97913. I am writing this letter today because this project was just recently brought to my attention. We started the purchase of this property almost one year ago to the day I am writing this, we were finally able to close in November of 2018 as this was a major purchase the property was almost 3/4 of a million dollars and is 113.4 acres. After weeks of negotiations we finally came to an agreement. During this time we asked the owners, caretaker, and title company about this proposed project and were told it was an old project that had subsided for multiple reasons, that being said it was definitely a determining factor for purchasing 2104 Owyhee lake road. So from day one we have been deceived and that has continued through now.

The only persons and or entities to contact us about this project were our neighbors. Idaho power has not followed through with any due diligence in completing this project or they would have continued to title search all of these private properties that they would like to utilize for their benefit of this Boardman to Hemingway line project. I have continually and tire contacted Idaho power to get any and all information about this project as we were notified only a week and a half prior to the Efsc meetings being held around Oregon. When I addressed the council publicly I had voiced that I was ill prepared as I needed to find out more about this project and how it would intrude upon our property and what our role would be in this project. I was given a small map and quite frankly was appalled at how intrusive it was to our property, especially without any contact from the entity wanting to utilize our property for their benefit. Finally about three days prior to the EFSC public comment period I contacted Idaho power and remember this is only about four days after finding out about this. I was put into contact with an Idaho power project engineer named Mike Vaughn, after contacting him Mr. Vaughn was to our property very shortly thereafter. As the president of our company and myself sat down with Mr. Vaughn he explained very vaguely what the project entailed, also at this time we had a lot of questions which I would speculate anyone would once you look at the attached map and see how much of our land they proposed to take over for their company. During this meeting we were encouraged to let them do their job and not continue with our development because it would impede their goal and we would just have to demolish and remove any development that would be in their way and we should wait for EFSC to approve their project. During this time we also questioned what would happen if we weren't ok with this project and what recourse we would have? We were told that it was happening no matter what that they had worked on this and sorry we weren't involved but there would be no recourse in this matter and if we didn't cooperate that they would push for inanimate property domain repossession, big words for us to absorb but we had an understanding of what this meant so I replied "how could this happen?" I was told by Mr. Vaughn that we didn't have "deep enough pockets to battle this in court". At the initial meeting on our property we asked Mr. Vaughn for any and all paperwork he could provide us pertaining to this project. And the only materials I was provided at this time were what our neighbors provided and nothing from Idaho power. I show up to the EFSC public meeting to make my public statement, I hear someone call my name from across the room and see someone I have never seen before calling out my name, it is another Idaho power representative whom I have never met in my life but he knew exactly who I was, introduces himself

as Mark from Idaho power, again I tell him we are not interested in them using our land for there project again I am told sorry about your luck but its happening and really nothing I can do at this juncture because it is so late in the planning stages. I make my public comment to the board the meeting commences and Mark wants to talk to me yet again. I told him my neighbors, family and myself are not interested in this project and why weren't we notified? I was told well since BLM forced them onto private lands in the 305 mile stretch of this project it crosses and interferes with over 700 private properties and they cant talk to everybody and title search all these properties continually to ensure it isn't a problematic to the property owners. Mark also encouraged me to try and talk to my neighbors and see if we could arrange a meeting, I said well my neighbors are not interested either and that they were upset with me because they thought we were ok with your project because of how much land of ours was going to be used in this project as that was not the case at all.

A few weeks later we received a phone call of a cordial invitation to a banquet dinner from Idaho power for us and our neighbors to discuss the matter at hand. We were assured our neighbors would be attending as they were just invited and confirmed as going. We show up to the address we were given, The Vale Grange Hall which is bout 30 minutes away from our residence. We arrive and it is in fact not what was described the only people in attendance are 8 Idaho power employees and our two closest neighbors. We all start talking to Idaho power looking at maps and discussing this proposed project. During this meeting I ask once again for documents pertaining to this project and I was told they had it all together and I should be receiving it within a day or two and that it could be emailed as well. Finally after about two hours of back and forth we asked ok so why are we here? They said well we want to know how you feel about this project and if you have any suggestions on alternative routes or anything for this project. I stand up with the map they provided and go to the overhead projector and show them what they have outlined as Vale BLM district utilities corridor, I explained to them at this point it would benefit all parties involved if they were to include this utilities corridor into there site mapping and avoid all of our properties all together. I proposed to Idaho power that I had come up with an A,B, and C option that suites our needs and asked if they had other options if EFSC dines there current proposal MR.Vaughn said No, there is no B option this is happening and it will be difficult to stop this project, My A proposal was in our favor that EFSC denies this project, B they find an alternative route that avoids all of us and utilizes the existing corridor, And C we go to court. My neighbors and myself agreed that it should be the designated route and that we would like them to contact BLM to get this done. The meeting commences and my wife and I are confronted by Mike Vaughn and another Idaho power associate and told if we want any of the information we will have to subpoena this information because of legality purposes and that it isn't public information because it was between Idaho power and the previous land owners, I was emailed a biological survey of our property which is completely inaccurate and could be considered a falsified document in order to achieve there ultimate goal, also at this time our neighbors are also talking to other Idaho power representatives. I walk over to where my neighbor Mr. Jim Foss is standing talking to and Idaho power representative and they are offering him two brand new pivots to replace the existing one he has because the power-lines magnetic field will cause issues to the existing GPS operated one that is currently in operation on his property. We leave and the neighbors and I agree to be in touch soon. A few days later we hold a meeting at the Owyhee water shed with our neighbors and discuss what our next steps are. We all agree to setup a meeting with BLM.

With the help of Roger Finley we were able to get meeting scheduled with vale BLM representative Renae and Brent. All of our neighbors and Mr. Finley as well as representative Lynn Finley are in attendance. During this meeting we discussed the process and what role each representative of each entity played in the planning of this project. Introduced ourselves and proceeded to delve into the discussion. We proposed several options to the BLM for routes, even to go as far as offer to purchase land to be utilized for this project or to do a land exchange. The discussion also led into co-locating the new power lines within the existing power corridor and we were told that wasn't possible because of 9/11. 9/11? So we are fear mongering the general public with unprecedented or factual documentation of terroristic threats to a power corridor that is of insignificant threat for a terrorist attack? We all left feeling like the meeting that we had was productive and that they would work with Idaho power to remedy this. Just this morning 8/22 as I was writing this letter I had to stop and have a scheduled conference call with Idaho power regarding there new proposed route they discussed with BLM, once again it was a half hearted attempt on Idaho powers part to remedy this situation. I was railroaded once again into having to subpoena any information even though through the public information freedom act, and told that there was no information that can be provided to us at this point.

In short, to summarize the gravity of this situation we are not accepting of this project. We have been continually and persistently deceived and deprived of any information to be able to site specific ORS numbers. I can assure you the biological, cultural, and eis surveys have been not conducted in such a manner other than to achieve Idaho powers goal of using our personal private property to their benefit. I would hope the council can understand our position and hold accountable Idaho power for the manner in which they have approached this project. I have been put off in every way trying to obtain information regarding this project and there are several ORS numbers that have not been strategically

followed in this process. I have had limited time in this manner to obtain specific ORS numbers and compile the complete list of the deceitful process Idaho power has been conducting there business, from limited public input or information to incomplete survey information they have provided to EFSC. I hope that the bribery of offering equipment and or services to achieve their goals is taken into consideration as well. I will include some maps and a few ORS numbers and information on a separate attachment.

In closing I want to thank you for taking your time to read this letter documenting my experience with this entity in the short time I have had the opportunity to preserve my property from such a project that will be detrimental to my way of life as well as my investment and the quality of life for our friends neighbors and children who are the future generation that will be preserving this property and the way we have choose to live our lives in the canyon lands of Malheur county. EFSC must deny the this site certificate and include all of these factors in determining that there is a better way in the future to achieve projects of this magnitude. Without deceiving the general public, private landowners ,and EFSC. I have also included many points of contact for further comment and discussion of this matter and encourage any and all continued contact to stay informed and up to date on this project.

Best regards,

Timothy C. Proesch

2104 Owyhee lake road Nyssa, Oregon, 97913

P.O.BOX 2583 Nyssa, Oregon, 97913

[owyheeoasis@gmail.com](mailto:owyheeoasis@gmail.com)

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Work-(541) 212-4611

Ch. 469 Attachment has specific highlighted areas to be pointed out, the first map (Parcel 21S45E1300301 survey results) is Idaho Powers Inaccurate geological survey of the property, The second map is a revised map that we were sent yesterday, August 21, 2019 after Idaho Powers PRIVATE meeting with Vale BLM.

Boardman to Hemingway  
Transmission Line Project

**Parcel 21S45E1300301  
Survey Results**

Malheur County, Oregon



Survey Results

- Parcel Boundary (21S45E1300301)
- Wildlife Sightings
- Noxious Weeds**
- Bur buttercup
- Canada thistle
- Field bindweed
- Kochia
- Russian thistle
- Scotch thistle
- Whitetop
- Habitat**
- Agriculture / Developed
- Open Water / Unvegetated Wetland
- Shrub / Grass
- Wetland

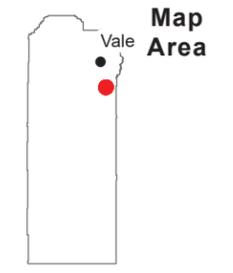
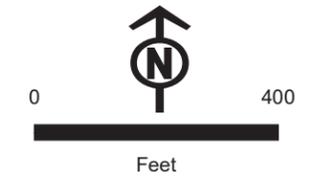
Project Features

- Proposed Route
- Site Boundary (Survey Corridor)
- Mile
- Tenth
- Access**
- Existing Road, Substantial Modification, 21-70% Improvements
- New Road, Primitive
- Work Areas**
- Pulling and Tensioning
- Structure Work Area
- Land Status**
- Bureau of Land Management
- Private
- Designated Utility Corridors**
- Vale District (BLM) Utility Corridor

Notes:  
Not intended for construction, or any uses other than intended purpose.

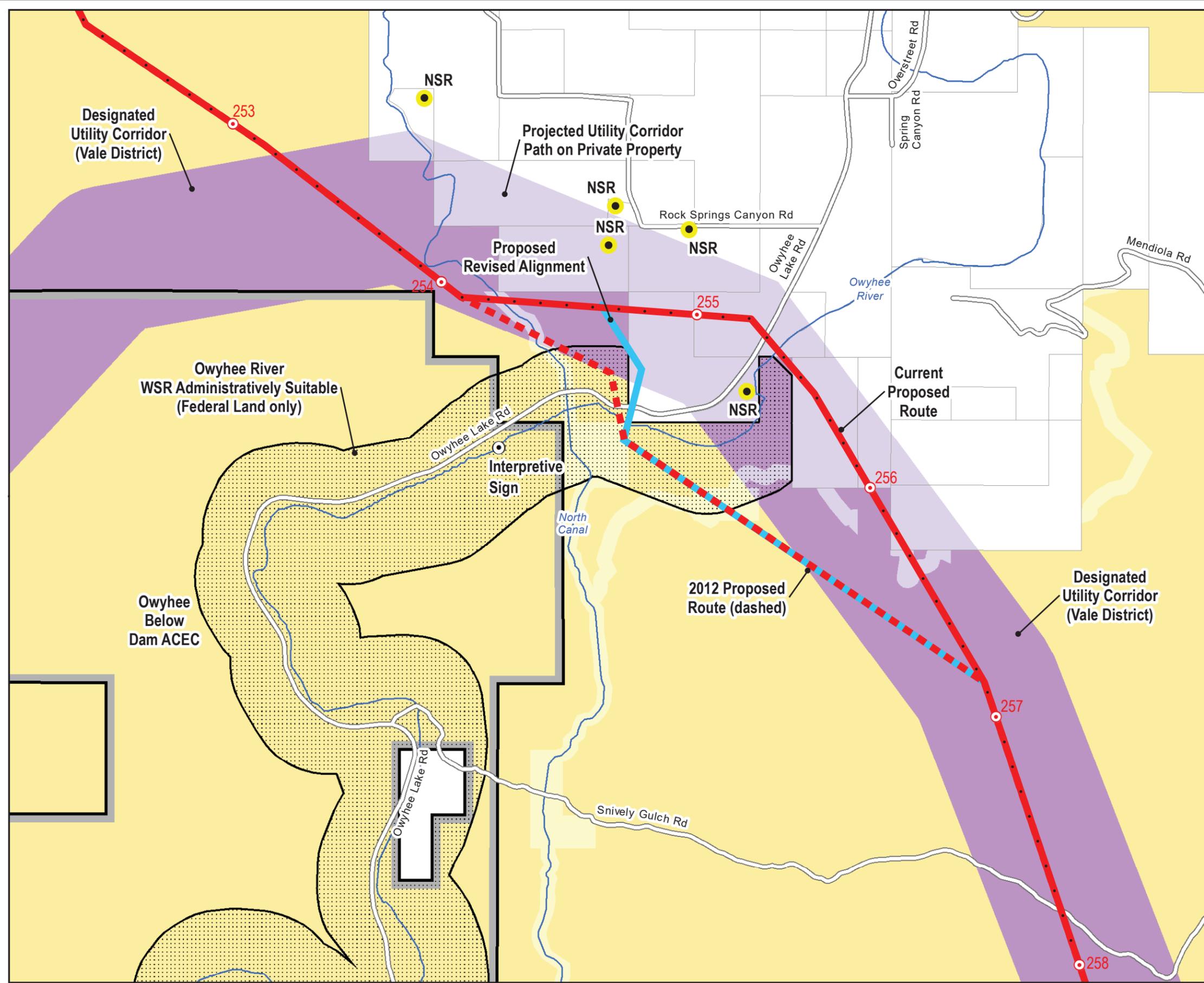
Data Source(s):  
BLM, Idaho Power, Malheur County, ORBIC, Tetra Tech

Base Map:  
Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Boardman to Hemingway  
Transmission Line Project

**Area in the Vicinity of the  
Owyhee River Crossing**  
Malheur County, Oregon



**Project Features**

- Proposed Route
- - - 2012 Proposed Route
- Proposed Revised Alignment
- ⊙ Mile
- Tenth

**Roads**

- Roads
- River or Canal

**Land Status**

- Bureau of Land Management
- Bureau of Reclamation
- Parcels (Private)

**Designated Utility Corridors**

- Vale District (BLM) Utility Corridor
- Projected Path of Utility Corridor on Private Property

**Owyhee River WSR**

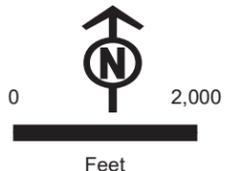
- WSR Administratively Suitable (Federal Land only)

**Other Features**

- Owyhee Below Dam ACEC
- Noise-Sensitive Receptor
- Lower Owyhee Wildlife Watching Interpretive Sign

**Notes:**  
Not intended for construction, or any uses other than intended purpose.

**Data Source(s):**  
BLM, Esri, Idaho Power, StreamNet





*Juniper Products by Wes Prouty*

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P.O. Box 138  
35188 Vandecar Rd.  
Durkee, OR 97905-0138

May 28, 2019

KELLEN TARDAEWETHER  
OREGON DEPT. OF ENERGY

RE: B2H. DFOComments:

This letter is to support the proposed route of B2H through the Durkee area of Baker County, Oregon, and the entire route of B2H.

*Wesley B Prouty*  
Wesley B Prouty