

Attachment 2

DPO Comment Index and DPO Comments

**Boardman to Hemingway Transmission Line Project
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DPO Page #	Comment	Proposed Edit
Page 4	Typo	For additional discussion of the comparison between the deferral <u>federal</u> NEPA review and permitting process and the Oregon Energy Facility Siting Council's review and permitting process see section III.A, <i>Transmission Corridor Selection</i> , of this order.
Page 39	Typo	The applicant proposes four pulling and tensioning sites to include light-duty fly yards. The counties in which the light-duty fly years <u>yards</u> are proposed to be located are Umatilla, Baker and Malheur counties.
Page 41	Typo	Under ORS 469.503, to issue a site certificate, the Council shall determine that the preponderance of evidence on the record supports <u>findings</u> that the facility complies with the applicable standards adopted by the Council.
Page 52	Certain of this information may be considered confidential Critical Energy Infrastructure Information or confidential business information, and therefore, the condition language should specify that submittal to the identified entities may require procedures designed to protect that confidentiality— e.g., non-disclosure agreements. Idaho Power proposes additional condition language referencing those procedures, language that ODOE has used in other proposed conditions.	Recommended General of Review Standard Condition 5: The certificate holder shall submit, <u>subject to confidential material submission procedures</u> , a legal description of the site to the Department, Malheur County Planning Department, Baker County Planning Department, Union County Planning Department, Umatilla County Planning Department, and Morrow County Planning Department within 90 days after beginning operation of the facility.
Page 54	Throughout the DPO there are conditions relating to the finalization of the draft plans, including mitigation plans, which are submitted to the Department for approval in consultation with certain reviewing agencies (e.g., ODFW, SHPO, county planning departments, or other agencies). These proposed conditions, however, generally do not address the timing associated with this review and consultation by ODOE and reviewing agencies, except that in most cases the plans need to be finalized before construction may begin. To ensure that review and approval of these plans does not unreasonably delay the commencement of construction, Idaho Power requests that ODOE recommend a	Idaho Power proposes that ODOE add the following discussion on or about Page 54 following Recommended General Standard of Review Condition 10: <u>Throughout the DPO there are conditions relating to the finalization of certain draft plans, including mitigation plans, which will be submitted to the Department for approval in consultation with the appropriate reviewing agencies. To ensure timely review and approval of these plans in a manner that does not unreasonably delay the commencement of construction, the Department proposes the following condition:</u>

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	new condition that clarifies the duration of review and consultation process, and specifies procedures if the reviewing agency declines to timely comment.	<u>Recommended General of Review Standard Condition 11: For draft plans that require final review by the Department and/or consultation with counties or reviewing agencies, such review and consultation will not unreasonably delay approval of the final plan, and in any event, such review and consultation will be completed by the Department and the identified counties/reviewing agencies within 60 days.</u>
Page 54	If ODOE adopts Idaho Power's proposal to add a condition describing the plan review process, ODOE should update the condition numbering accordingly. There are also two typos in the condition language.	Recommended General Standard of Review Condition 11 12: Subject to conditions of the site certificate, the certificate holder may construct the facility anywhere within the site boundary (approved corridor(s)), and as described in ASC Exhibit B and represented in ASC Exhibit C Attachment C-2 and C-3 mapsets. The approved corridors include: a. The proposed route in Morrow, Umatilla, Union, Baker, and Malheur counties;
Page 59	Typo	These inspections are conducted from either the ground or air and are designed to ensure the integrity of the system by identifying obvious line threatening defects. Emergency line patrols are performed in response to any unexplained system outage or interruption, or whenever requested by a dispatcher, to identify a major structural failures or issues.
Pages 59-60	Certain of this information may be considered confidential Critical Energy Infrastructure Information or confidential business information, and therefore, the condition language should specify that submittal to the identified entities may require procedures designed to protect that confidentiality—e.g., non-disclosure agreements. Idaho Power proposes additional condition language referencing those procedures, language that ODOE has used in other proposed conditions.	Recommended Organizational Expertise Condition 1: During operations, the certificate holder shall provide, <u>subject to confidential material submission procedures</u> , documentation of inspection, including date inspection(s) occurred, issues identified, and any corrective actions taken, within the annual report submitted to the Department pursuant to OAR 345-026-0080 (1)(b), for the following:
Pages 60-61	Because ODOE is requesting information related to a very discrete contract provision and the remainder of the contract would be irrelevant to this request and likely to include	Recommended Organizational Expertise Condition 4: Prior to construction, the certificate holder shall contractually require all construction contractors and subcontractors involved in

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	<p>confidential business information, Idaho Power requests that ODOE amend the condition to require a copy only of the contract terms that are directly related to legal and site certificate compliance.</p> <p>Idaho Power also requests ODOE make clear that Idaho Power's contractors, on Idaho Power's behalf, may perform the site certificate condition requirements.</p>	<p>the construction of the facility to comply with all applicable laws and regulations and with the terms and conditions of the site certificate. The certificate holder shall provide <u>to the Department</u> a copy of executed contracts to the Department <u>the executed contract terms requiring legal/site certificate compliance</u>. Copies of <u>the relevant</u> contracts terms may redact business confidential information. <u>The contractors, on behalf of the certificate holder, may perform the requirements set forth in these site certificate conditions. However, such performance, and Such such</u> contractual provisions, shall not relieve the site certificate holder of responsibility under the site certificate.</p>
Page 62	Typo/clarification	None of the possible issues identified in the audits presented a material risk to the bulk electric system, nor were they not associated with a transmission service interruption, and nor did they adversely impact distribution customers
Page 63	Typo	The applicant sites <u>states</u> that it settled the citations with OSHA.
Page 76	<p>The introductory phrase stating "Prior to construction" seems unnecessary given the timing references that follow that phrase (i.e., "At least 90 days prior to construction").</p> <p>And typos</p>	<p>Recommended Structural Standard Condition 1: Prior to construction of a phase or segment of the facility:</p> <p>a. At least 90-days (delete dash) prior to construction of a phase or segment of the facility, unless otherwise agreed to by the Department, the certificate holder shall submit an investigation plan for the pre-construction site-specific geologic and geotechnical investigation to the Department for review in consultation with DOGAMI. The investigation plan shall specify the investigation methods to be used to evaluate site-specific seismic and non-seismic hazards identified in (b) of this condition and should, at a minimum, be consistent with the Oregon State Board of Geologist Examiners Guideline for Preparing Engineering Geologic Reports and include methods for literature review, geotechnical field exploration program, laboratory testing, mapping and detailed site reconnaissance.</p>

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		<p>b. At least 90-days (delete dash) prior to construction of a phase or segment of the facility, unless otherwise agreed to bye by the Department, the certificate holder shall submit to the Department and DOGAMI a pre-construction site-specific geological and geotechnical investigation report (report) for review, demonstrating that the facility site has been adequately characterized and the facility and temporary construction activities, such as blasting, have been designed and located to avoid seismic, soil and geologic hazards. The report shall at a minimum include information derived from the geological and geotechnical investigations regarding:</p> <p>...</p> <p>4. Potential slope instability and landslide hazards based on boring locations spaced approximately 1 mile along the alignment and at dead-end structures; any corners or changes in alignment heading (angles); crossings of highways, major roads, rivers, railroads, and utilities as power transmission lines, natural gas pipelines, and canals; and, locations necessary to verify lithologic changes and/or geologic hazards such as landslides, steep slopes, or soft soil area.</p>
Page 84	Typo	Increased wildfire and forest disturbances may result in decreased vegetative cover on sleep-steep slopes, thereby increasing runoff and erosion rates.
Page 84	Typo	The Department notes that these mitigation measures includes-include measures to reduce the risks posed by flooding, soil erosion, landslides, and mass wasting events.
Page 103, Table LU-1, Footnote 1	Typo	Specifically, MCZO Sections 3.010(C) (utility and transmission towers), (G) (dimensional standards) and (H) (yard setbacks) were omitted because under ORS 215.283(1)(g), a utility facility necessary for public service is permitted subject only to the requirements of ORS 215.275 and the county cannot impose additional approval criteria; ORS 215.283 and 215.275 requirements are addressed later in this order.

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Page 105	Typo	In addition a to the 500 kV transmission line, proposed facility components within EFU zoned land would include
Page 105	Idaho Power requests that ODOE remove the term "conditional" because, as ODOE states in the paragraph following this one, the County's conditional use requirements are not applicable.	Based on review of the referenced court decision and historic Council land use evaluations, the Department agrees and recommends Council find that proposed and alternative facility components should be evaluated as a utility facility necessary for public service and therefore would be a conditionally permitted use in EFU zoned land under MCZO Section 3.010(D)(17).
	Typo	Notwithstanding the language in the County's code, the conditional use requirements beyond those that are consistent with ORS 215.275 are not applicable to proposed and alternative facility components because, as a utility facility necessary for public service under ORS 215.283(1) (e) , the use is permitted subject only to the requirements of ORS 215.275 and the county cannot impose additional approval criteria.
Page 105-106	<p>ODOE's citation to ORS 215.296 appears to be an error. ORS 215.296 applies to uses allowed under ORS 215.213(2) and (11), and ORS 215.283(2) and (4). Here, the project is authorized under (1) of those statutes as a "utility facility necessary for public service," and not under ORS 215.213(2) or (11), or ORS 215.283(2) or (4). Therefore, ORS 215.296 does not apply to this project. In its place, Idaho Power suggests that ODOE may have meant to reference ORS 215.275(5), which discusses accepted farm practices similar to ORS 215.296. Consider substituting in ORS 215.275(5) or eliminating it altogether since ORS 215.275, without the subsection, is already included.</p> <p>Also, ODOE should include a footnote recognizing that Idaho Power did a county-specific analysis for each county, showing the Project must cross EFU, even though such analysis was not required.</p>	<p>For facility components located in EFU zoned land, the land use compliance evaluation is limited to ORS 215.275, as presented in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215.296<u>275(5)</u> (Exclusive Farm Use Requirements) of this order. <u>Footnote</u></p> <p style="text-align: center;"><u>Footnote: Although beyond what is required to demonstrate compliance with ORS 215.275, the applicant performed a county-specific alternatives analysis for each county in its Exhibit K. Please refer to Exhibit K, Section 6.4.5 for additional information specific to Morrow County.</u></p>

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Page 109	Typo	If the corridor is a 18 State Highway, use ODOT standards. (MC-C-8-98)
Page 114	Confusing text	Based on this evaluation, four Goal 5 stream/riparian resources would be located on private/state land within the proposed site boundary including: Butter Creek, Matlock Canyon Creek, Little Butter Creek, and Sand Hollow Creek; and two Goal 5 habitat and wildlife related resources would be located on federally-owned (public) land within the site boundary including: Naval Weapons System Training Facility (NWSTF) Boardman and certain Washington ground squirrel (WAGS) habitat, which are two resources <u>that overlap geographically and are both designated as a Goal 5 resource for the protection of WAGS habitat but are basically one in the same (i.e. the Goal 5 resource identified as "certain WAGS habitat" is located within the NWSTF Boardman site and the NWSTF Boardman site is a Goal 5 resource for WAGS habitat).</u>
Page 116	Typo	Based on the proposed construction activity, and the presumed basis of Goal 5 protection as an important water/riparian area, potential impacts from stream crossings and road modifications would result from permanent and temporary removal and fill; and, erosion and vegetation disturbance impacts associated with the temporary steam <u>stream</u> crossings.
Page 121	Clarification	Recommended Land Use Condition 1: . . . c. During construction, the certificate holder shall comply with <u>the</u> conditions of permits <u>and consultation requirements</u> listed in (a) and (b), <u>and if applicable, (d).</u>
Page 127	Typo Also, ODOE should include at least a footnote recognizing that Idaho Power did a county-specific analysis for each county, showing the Project must cross EFU, even though such analysis was not required.	Therefore, for these locations, the land use compliance evaluation is limited to ORS 215.275, as presented in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215. 296275(5) (Exclusive Farm Use Requirements) of this order. <u>Footnote</u>

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		<p><u>Footnote: Although beyond what is required to demonstrate compliance with ORS 215.275, the applicant performed a county-specific alternatives analysis for each county in its Exhibit K. Please refer to Exhibit K, Section 6.5.5 for additional information specific to Umatilla County.</u></p>
Page 127	ODOE should recognize that the Umatilla County Planning Department directed Idaho Power to treat the GZ Zone as Goal 4 forest lands.	Proposed facility components would be located on forested lands within the GF zone, <u>and the Umatilla County Planning Department directed the applicant to analyze the proposed facility in the GF zone as being in Goal 4 forest lands.</u>
Page 128	<p>Typos</p> <p>And clarifications</p>	<p>The Department agrees and recommends Council conclude that UCDC 152.4085(R) does not apply to facility components proposed to be located in GF zoned land. However, it is noted that in the absence of UCDC 152.4085(R), there are no land use categories within UCDC 152.4085 for the proposed facility. However, <u>in the absence of applicable local substantive criteria, state rules apply. ,because Because the facility components are proposed to be located in forest land, OAR Chapter 660, Division 006 would apply. In particular, LCDC Chapter 660 establishes authorized uses within forest lands as inclusive of transmission lines within a 100 foot right-of-way, state rules would apply directly.</u></p>
Page 142	Typo	<p>Based on the analysis provided in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215.296275(5) of this order and ASC Exhibit K Section 4.0, Section 6.5.2.1, Section 6.5.2.2, and Section 6.5.5, the Department recommends Council find that construction and operation of the proposed facility would not significantly impact accepted farm practices, including costs.</p>
Page 144	Clarifying that Oregon Forest Practices Act compliance applies only to those roads within designated forest land.	<p>Recommended Land Use Condition 4: Prior to construction of any phase or segment of facility components in Umatilla County, the certificate holder shall work with the Public Works Department on building standards for the road improvements and construction, and <u>for any roads proposed</u></p>

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		<u>to be constructed in forest land in Umatilla County, the certificate holder</u> will ensure road construction is consistent with the Oregon Forest Practices Act.
Page 144	Clarification	Recommended Land Use Condition 5: . . . iii. Within the transmission line right-of-way, a maximum of 25% of existing natural vegetation along streams, lakes, and wetlands may be removed, unless <u>removal of a greater quantity of vegetation is</u> necessary
Page 149	Typo	Notwithstanding the language in the County's code, the conditional use requirements beyond those that are consistent with ORS 215.275 are not applicable to proposed facility components because, as a utility facility necessary for public service under ORS 215.283(1)(g), the use is permitted subject only to the requirements of ORS 215.275 and the county cannot impose additional approval criteria.
Page 150	Typo Also, ODOE should include at least a footnote recognizing that Idaho Power did a county-specific analysis for each county, showing the Project must cross EFU, even though such analysis was not required.	Therefore, for these locations, the land use compliance evaluation is limited to ORS 215.275, as presented in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215. 296 <u>275(5)</u> (Exclusive Farm Use Requirements) of this order. ^{Footnote} <u>Footnote: Although beyond what is required to demonstrate compliance with ORS 215.275, the applicant performed a county-specific alternatives analysis for each county in its Exhibit K. Please refer to Exhibit K, Section 6.6.5 for additional information specific to Union County.</u>
Page 150	ODOE should recognize that the Union County Planning Department directed this analysis.	<u>For the A-2 zone, the Union County Planning Department directed the applicant to perform a predominant use analysis to determine whether the land within in the site boundary is rangeland or cropland.</u> The applicant provides an analysis of the predominant use within the parcels crossed by the proposed facility in the A-2 zone, based on taxlot data from

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		the county, soil type data from SSURGO, and 2011 aerial photography.
Page 151	Typo	The evaluation of whether the proposed facility is necessary for public service is provided in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215. 296 <u>275(5)</u> (Exclusive Farm Use Requirements) of this order.
Page 153	ODOE should recognize that the Union County Planning Department directed this analysis.	<u>For the A-4 zone, the Union County Planning Department directed the applicant to perform a predominant use analysis to determine whether the land within in the site boundary is rangeland or forest land.</u> The applicant provides an analysis of the predominant uses within the parcels crossed by the proposed facility in the A-4 zone, based on taxlot data from the county, soil type data from SSURGO, and 2011 aerial photography.
Pages 153-154	Typo And clarification linking conclusion to the analysis in the next paragraph.	For the proposed and alternative facility components located within forestland portions of the A-4 zone, the county code refers to OAR Chapter 660 Division 6 – which is evaluated in Section IV.E.2.2. ORS <u>552772</u> .210 and OAR 660-006-0025 of this order. <u>Based on the evaluation presented in Section IV.E.2.2. of this order, the Department recommends Council find that the proposed and alternative facility is consistent with OAR Chapter 660, Division 6 and is, therefore, allowed on the predominantly forestland portions of the A-4 zone.</u>
Page 154	Typo	Based on the evaluation presented in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215. 296 <u>275(5)</u> (Exclusive Farm Use Requirements) of this order, the Department recommends Council find that the proposed and alternative facility satisfies the ORS 215.275(2) factors and is, therefore, allowed on the predominantly farmland portions of the A-4 zone.
Pages 155-156	Clarification	UCZPSO 5.04(3) Criteria 1 and 2 mirror OAR 660-006-0025(4)(q), which is evaluated in Section IV.E.2.2. ORS 772.210 and OAR 660-006-0025 of this order. UCZPSO 5.04(3) Criteria 3 applies to home occupations, parks and

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		campgrounds and temporary hardship dwellings, and therefore because these uses do not cover <u>apply to</u> new electrical transmission lines, would not apply to the proposed facility.
Page 170	Typo	Recommended Land Use Condition 7: . . . i. All signage shall comply with the provisions of UCZPSO 5.08.
Page 173	For Morrow, Umatilla, Union, and Malheur counties, ODOE included a description of the ancillary facilities, but did not include similar discussion for Baker County. ODOE should include that discussion for consistency and to help the reader. And typo	As described above, proposed facility components within Baker County's EFU zone include 69.2 miles of 500 kV transmission line. <u>The applicant identifies that ancillary facilities to the proposed transmission line located within EFU-zoned land would include and</u> five multi-use areas, one light-duty fly yard and two communication stations. <u>The applicant asserts that ancillary facilities, based on a 2001 and 2005 court decision, should be considered under the "utility facility necessary for public service" land use category.</u> ^{Footnote} <u>Based on review of the referenced court decision and historic Council land use evaluations, the Department agrees and recommends Council find that proposed facility components should be evaluated as ,which the Department recommends Council find would be</u> a major utility facility and therefore <u>would be</u> a conditionally permitted use within EFU zoned land under BCZSO Section 301.02(D). However, notwithstanding the language in the County's code, the conditional use requirements beyond those that are consistent with ORS 215.275 are not applicable to proposed facility components because, as a utility facility necessary for public service under ORS 215.283(1)(g), the use is permitted subject only to the requirements of ORS 215.275 and the county cannot impose additional approval criteria. <u>Footnote: See Save Our Rural Or. v. Energy Facility Siting Council, 339 Or. 353, 384 (2005) (upholding Council's</u>

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		determination that ancillary facilities are considered “utility facilities necessary for public service” ; Cox v. Polk County, 174 Or. Ct. App. 332, 343-44 (2001) (“utility facilities necessary for public service” may include ancillary or off-site equipment).
Page 173	Typo Also, ODOE should include at least a footnote recognizing that Idaho Power did a county-specific analysis for each county, showing the Project must cross EFU, even though such analysis was not required.	Therefore, for these locations, the land use compliance evaluation is limited to ORS 215.275, as presented in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215.296275(5) (Exclusive Farm Use Requirements) of this order. Footnote Footnote: Although beyond what is required to demonstrate compliance with ORS 215.275, the applicant performed a county-specific alternatives analysis for each county in its Exhibit K. Please refer to Exhibit K, Section 6.8.5 for additional information specific to Baker County.
Page 178	Typo	The proposed facility and site boundary would be located within Baker County’s Big Game Overlay zone and could potentially impact several scenic resources protected under the Baker County Comprehensive Plan Goal 5 Resources element.
Page 178	Typo	Proposed facility components in Baker County would predominately be located in EFU zoned land, which with a small segment (0.2 miles) of a substantially modified road to be located in RSA zoned land.
Page 179	Typos	However, the impact assessment is not evaluated in this section because, in the absence of a county adopted protective ive program for these resources, there is are no not applicable criteria for by which to evaluate the potential impacts.
Page 180	Typo	Baker County implements a Weed Control Plan based on statutory requirements for imposed under ORS 569.530 through ORS 569.450.

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<p>Page 184-185</p>	<p>Proposed language is similar to language provided for other counties. ODOE should include this language for consistency.</p>	<p>The Department agrees and recommends Council find that the proposed facility components located in EFU and ERU-zoned land would be a use permitted outright under MCC 6-3A-2.</p> <p><u>Proposed facility components would be located in EFU-zoned land across five Oregon counties including Morrow, Umatilla, Union, Baker, and Malheur. Therefore, for these locations, the land use compliance evaluation is limited to ORS 215.275, as presented in Section IV.E.2.1., ORS 215.283, ORS 215.275 and ORS 215.276 (Exclusive Farm Use Requirements) of this order.</u>^{Footnote}</p> <p><u>Footnote: Although beyond what is required to demonstrate compliance with ORS 215.275, the applicant performed a county-specific alternatives analysis for each county in its Exhibit K. Please refer to Exhibit K, Section 6.10.5 for additional information specific to Malheur County.</u></p>
<p>Pages 190-191</p>	<p>ODOE should add a discussion regarding the NPZO Dimensional Standards, which are addressed in the application and Recommended Land Use Condition 13.</p>	<p><u>NPZO 4.03: Dimensional Standards</u></p> <p><u><i>In the (C-2) Commercial Interchange Zone, yards shall be maintained as follows: 1. There shall be a front yard of at least thirty (30) feet. 2. There shall be no side yard setback except at least twenty (20) feet when adjacent to a Residential Zone, or on the street side of a corner lot. 3. There shall be no rear yard setback, except at least twenty (20) feet when adjacent to a Residential Zone. 4. No buildings or structure hereafter erected or enlarged shall exceed a height of forty-five (45) feet.</i></u></p> <p><u>Dimensional standards are not evaluated as applicable substantive criteria; however, it is noted that the applicant evaluates these criteria and represents that the proposed</u></p>

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		<u>facilities will comply with NPZO 4.03(1) and (4), and that NPZO 4.03(2) and (3) are not applicable because the proposed facility is not adjacent to a Residential Zone. Based on the Department's review, the Department considers the applicant's analysis to demonstrate consistency with these provisions.</u>
Page 193	Typo	There are no alternative routes or facility component locations proposed within City of Huntington.
Page 195, Subheading	Typo	IV.E.2.1. ORS 215.283, ORS 215.275 and ORS 215. 296 <u>275(5)</u> (Exclusive Farm Use Zone Requirements)
Page 195	Typos Clarification	Statutes which apply directly to the proposed facility include ORS 215.275, <u>and 215.283, and;</u> ORS 215. 296 <u>275(5) has been adopted by the applicable counties, but because it is the same criteria across counties, is addressed in this section.</u>
Page 196	Clarifications	ORS 215.275(2)(a) requires <u>provides</u> that, in order to site the proposed facility on EFU-zoned land, the applicant <u>may</u> demonstrate that the proposed facility must be sited in an EFU zone due to technical and engineering feasibility constraints.
Page 197	Clarifications	The applicant did not provide examples or present a discussion of geophysical areas that would present technical or engineering feasibility constraints; as such, the Department recommends that the Council find that the applicant would not satisfy technical and engineering feasibility as described in ORS 215.275(2)(a) <u>was not the primary driver for siting the project on EFU-zoned land.</u>
Page 197	Typo Clarification	As demonstrated in ASC <u>Figure Exhibit K</u> , Figure K-3, a large portion of the area between the two points of interconnection is EFU zoned land, <u>and the applicant explains in ASC Exhibit B that EFU lands cover approximately 77 percent of the seven-county study area in Oregon.</u>
Page 197	Clarifications, providing added support for ODOE's conclusions regarding avoidance of EFU lands	Because large areas of EFU zoned lands exist between the two points of interconnection, it would be impossible to construct the proposed facility while avoiding all EFU zoned

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		<p>lands (with the exception that the transmission line would be required to completely bypass Oregon and travel only within Washington and Idaho states).^{Footnote}</p> <p><u>Footnote: The applicant developed a conceptual EFU-avoidance route shown in ASC Exhibit K, Figure K-3, which demonstrates that the shortest route that would avoid all EFU lands would be required to bypass Oregon entirely and is not a reasonably direct route.</u></p> <p>Given that large areas of EFU zoned land exist between the two proposed transmission endpoints, the Department agrees that there would be no reasonably direct route that would allow the applicant to construct the transmission line while also avoiding all impacts to EFU zoned land. As such, the Department recommends that the Council find the associated transmission line is “locationally dependent” and therefore satisfies ORS 215.275(2)(b).</p> <p><u>Additionally, while the facility is “locationally dependent” and avoidance of EFU was not possible, the applicant represents that it attempted to design the proposed route to avoid lands zoned EFU to the maximum extent practicable. Although not required by ORS 215.275, the applicant represents that its extensive siting process prioritized avoiding impacts to irrigated and other high value farmland to the maximum extent practicable. As explained in detail in ASC Exhibit B, Attachment B-1, Appendix C, IPC identified irrigated farmland as a “high avoidance” constraint throughout its siting process. Nonetheless, the applicant had to balance minimizing impacts to EFU with avoiding impacts to the many protected resources in the study area (which are discussed in detail in ASC Exhibit B). The applicant represents that it continued to refine its proposed route in response to site-specific</u></p>
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		<p><u>information and landowner requests; and many of these micrositing changes included changes to minimize impacts to irrigated agriculture and agricultural operations. For example, an earlier version of the proposed route crossed 17.8 mile of irrigated farmland, and the current version of the proposed route crosses 6.6 miles of irrigated farmland.</u>^{Footnote}</p> <p><u>Footnote: The applicant represents that it endeavored to further reduce impacts to agricultural land by developing the West of Bombing Range Road Alternative (see ASC Exhibit B, Attachment B-4, 2015 Supplemental Siting Study). Working with BPA and the Navy, the applicant developed the West of Bombing Range Road Alternative, which takes advantage of an existing 69-kV transmission line ROW and was sited to minimize impacts to agriculture and NWSTF Boardman flight operations, and reduce impacts to WAGS habitat (through micrositing). The West of Bombing Range Road Alternative significantly reduced, but did not completely eliminate, impacts to agricultural lands and operations.</u></p>
Page 197	Clarification	<p>ORS 215.275(2)(c) requires <u>provides</u> that, in order to site the proposed facility on EFU zoned land, the applicant <u>may</u> demonstrate that the proposed facility must be sited on EFU zoned land due to a lack of available urban and nonresource lands.</p>
Page 198	Clarification	<p>ORS 215.275(2)(d) requires <u>provides</u> that, in order to site the proposed facility on EFU zoned land, the applicant <u>may</u> demonstrate that the proposed facility must be sited in EFU zoned land in order to utilize existing rights-of-way</p>
Page 198	Typo Clarification	<p>ORS 215.275(12)(e) provides that if the applicant may can demonstrate <u>that the proposed facility must be sited in EFU zoned land due to</u> specific health and safety reasons that would require the siting of the utility facility on EFU zoned</p>

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		land, then the applicant meets its regulatory burden under the statute and may site the utility facility on EFU zoned land.
Page 199	Clarification	As such, the Department recommends that the Council find the that public health and safety concerns in accordance with ORS 215.275(2)(e) were not the primary drivers for siting the proposed transmission line is not required to be sited on EFU zoned land to specifically respond to a public health or safety concern and therefore would not satisfy the criteria under ORS 215.275(1)(e).
Page 199	Typo Clarification	ORS 215.275(1 2)(f) provides that if the applicant may can demonstrate that <u>the proposed facility must be sited in EFU zoned land if</u> there are specific requirements imposed by state or federal agencies that would require the siting of the utility facility on EFU zoned land, then the applicant meets its regulatory burden under the statute and may site the utility facility on EFU zoned land.
Page 199	Typo	As such, the Department recommends that the Council find the proposed transmission line is not required to be sited on EFU zoned land to comply with additional state or federal requirements and therefore would not satisfy the criteria under ORS 215.275(1 2)(f).
Page 199	Idaho Power requests ODOE move its <i>215.275 Conclusion</i> section to the end of the alternatives analysis, because the conclusion addresses the subsection (2) alternatives analysis and not the other subsections of ORS 215.275.	<u>215.275(2) Conclusion</u> <u>As noted above, the applicant is required to meet one of the factors provided in subsection (2) to demonstrate compliance with ORS 215.275. The Department recommends that the Council find that the proposed facility is "locationally dependent" and that the applicant demonstrated that there is a "lack of available urban or nonresource lands" upon which to site the proposed facility, and that siting was driven in part by the "availability of existing rights-of-way." Therefore, the Department recommends Council find that the proposed facility would satisfy three of the factors set forth in</u>

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		<u>subsection (2) and therefore demonstrates that the utility facility must be sited on EFU zoned land.</u>
Page 199	Missing subheading, request adding subheadings for each subsection of ORS 215.275	<u>Restoration</u> Under ORS 215.275(4), the owners of a utility facility must be responsible for restoring, as nearly as possible, to its former condition, any agricultural land and associated improvements that are damaged or otherwise disturbed.
Page 200	Typos	Specific measures to minimize and mitigate agricultural impacts in each County , and recommended conditions to ensure compliance with those measures, are discussed below in the evaluation of compliance with each County's land use criteria <u>ORS 215.275(5)</u> .
Page 200	Idaho Power requests ODOE move this discussion from the <i>EFU Zoned Land Restoration</i> section to here because it seems more relevant to the (4) analysis.	<u>The applicant is required to minimize impacts to farming practices; the applicant must restore lands to a useful, nonhazardous condition and; the applicant must maintain a bond or letter of credit in the unlikely scenario that a third party would be required to decommission the facility and return lands to a pre-construction condition. As such, the applicant has provided the relevant information and the conditions contained within Section IV.G., Retirement and Financial Assurance would ensure that the applicant restores agricultural lands.</u>
Page 200	Missing subheading, request adding subheadings for each subsection of ORS 215.275 Clarification	<u>Mitigation of Impacts to Surrounding Agricultural Land</u> ORS 215.275(5) requires that the reviewing body impose clear and objective conditions of approval on the application to mitigate the impacts of the proposed facility, if any, on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmlands.
Page 200	Redundant text	Recommended Land Use Condition 14: The certificate holder shall:

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		<p>a. Prior to construction of any phase or segment of the facility, the certificate holder submit to the Department a final Agricultural Assessment and Mitigation Plan (based on the draft plan included as Attachment K-1 of the Final Order on the ASC) for review and approval, in consultation with Morrow, Umatilla, Union, Baker and Malheur counties.</p> <p>b. During construction of any phase or segment of the facility, the certificate holder shall implement the mitigation, monitoring and reporting measures as detailed in the final Agricultural Assessment and Mitigation Plan.</p>
<p>Pages 201-202</p>	<p>Idaho Power suggests that ODOE re-write the <i>Accepted Farm Practices on Surrounding Lands</i> section, replacing it with a discussion directed at ORS 275(5) rather than ORS 215.296, which doesn't apply to the project.</p>	<p>ORS 215.296 states:</p> <p>A use allowed under ORS 215.213 (Uses permitted in exclusive farm use zones in counties that adopted marginal lands system prior to 1993) (2) or (11) or 215.283 (Uses permitted in exclusive farm use zones in nonmarginal lands counties) (2) or (4) may be approved only where the local governing body or its designee finds that the use will not:</p> <p>i. Force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; and</p> <p>ii. Significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use."</p> <p>ORS 215.296(1) requires that the local governing body or its designate (in this instance the Council) may approve a use permitted under ORS 215.283(2) only when it determines that the use: "(a) Will not force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; and (b) Will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use."</p>

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		<p>ORS 215.296, which is mirrored in applicable county zoning provisions presented in this order, establishes approval standards for all conditional uses within EFU-zoned land and requires the Council to find that the conditional use would not force a significant change in, or significantly increase the cost of, accepted farm or forest practices on surrounding lands. While there are forest practices employed on surrounding lands in Umatilla and Union counties, the underlying land use zone in these counties is Grazing Farm and Timber Grazing, respectively, and not EFU. Therefore, the analysis focuses on potential impacts to farm practices and the cost of farm practices on surrounding lands in EFU zone.</p>
Page 205, Footnote 178	Typo	<p>The evaluation under ORS 215.283, 215.275, and 215.296<u>275(5)</u> is specific to EFU and Agriculture-Grazing.</p>
Page 208	Typo	<p>Potential impacts to the cost of accepted farm practices from construction and operation of the proposed facility include: a one-time costs to landowners, such as physical disturbance arising from the construction areas and roadways; annual costs, such as costs associated with weed control around towers and increased costs associated with farming around tower equipment; costs associated with land removed from production (other than areas containing a transmission tower), such as roadways or areas that are not readily irrigated due to field obstructions; costs associated with the disruption of a CRP program and; (5) costs associated with re-organizing irrigation systems.</p>
Page 209	Typo	<p>Based on the evaluation presented in ASC Exhibit K and reasoning and analysis presented in this order, and compliance with recommended Land Use Condition 14, the Department recommends Council find that the proposed facility would not result in significant adverse impacts to accepted farm practices nor result in a significant increase in the cost of accepted farm practices within the surrounding</p>

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		<p>area and therefore would satisfy the requirements of ORS 215. 296275(5).</p>
<p>Page 209</p>	<p>Add discussion on ORS 215.276 and new recommend land use condition regarding compliance with ORS 215.276.</p>	<p><u>ORS 215.276 states:</u></p> <p><u>(1) As used in this section:</u></p> <p><u>(a) "Consult" means to make an effort to contact for purpose of notifying the record owner of the opportunity to meet.</u></p> <p><u>(b) "High-value farmland" has the meaning given that term in ORS 195.300.</u></p> <p><u>(c) "Transmission line" means a linear utility facility by which a utility provider transfers the utility product in bulk from a point of origin or generation, or between transfer stations, to the point at which the utility product is transferred to distribution lines for delivery to end users.</u></p> <p><u>(2) If the criteria described in ORS 215.275 for siting a utility facility on land zoned for exclusive farm use are met for a utility facility that is a transmission line, or if the criteria described in ORS 215.274 for siting an associated transmission line are met, the utility provider shall, after the route is approved by the siting authorities and before construction of the transmission line begins, consult the record owner of high-value farmland in the planned route for the purpose of locating and constructing the transmission line in a manner that minimizes the impact on farming operations on high-value farmland. If the record owner does not respond within two weeks after the first documented effort to consult the record owner, the utility provider shall notify the record owner by certified mail of the opportunity to consult. If the record owner does not respond within two weeks after the certified mail is sent, the utility provider has satisfied the provider's obligation to consult.</u></p> <p><u>(3) The requirement to consult under this section is in addition to and not in lieu of any other legally required consultation process.</u></p>

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		<p><u>The applicant represented in Exhibit K of the ASC that following issuance of the site certificate, it will consult with landowners of high-value farmland regarding micrositing of the transmission line within the site boundary as required by ORS 215.276(2) (see also Attachment K-1, Agricultural Lands Assessment). Additionally, the applicant represents that it will consult with all landowners regarding micrositing of the project.</u></p> <p><u>Recommended Land Use Condition ##: Prior to construction, the certificate holder shall consult with all landowners, including landowners of high-value farmland, regarding micrositing of the project.</u></p>
Page 209	Delete heading and related discussion related to ORS 772.210 as it is a condemnation statute and not a siting requirement. This comment would apply to other instances in the DPO where ODOE references Section IV.E.2.2 of the DPO	IV.E.2.2. ORS 772.210 and OAR 660-006-0025 (Forest Zone Requirements)
Page 209-210	Idaho Power finds that ODOE's summary of ORS 772.210 is confusing and appears to misstate the requirements of the statute. Idaho Power recommends that instead of paraphrasing the requirements of the statute, ODOE instead include excerpts of relevant provisions of the statute.	<p>OAR 660-006-0025(4)(q) references transmission lines within a 100-foot right-of-way as a conditional use authorized in forest zoned land. <u>ORS 772.210 provides:</u></p> <p><u>(1) Any public utility, electrical cooperative association or transmission company may:</u></p> <p><u>(b) Condemn such lands not exceeding 100 feet in width for its lines (including poles, towers, wires, supports and necessary equipment therefor) and in addition thereto, other lands necessary and convenient for the purpose of construction of service facilities. If the lands are covered by trees that are liable to fall and constitute a hazard to its wire or line, any public utility or transmission company organized for the purpose of building, maintaining and operating a line of poles and wires for the transmission of electricity for lighting or power purposes may condemn such trees for a</u></p>

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		<p><u>width not exceeding 300 feet, as may be necessary or convenient for such purpose.</u></p> <p><u>(2) Notwithstanding subsection (1) of this section, any public utility, electrical cooperative association or transmission company may, when necessary or convenient for transmission lines (including poles, towers, wires, supports and necessary equipment therefor) designed for voltages in excess of 330,000 volts, condemn land not to exceed 300 feet in width. In addition, if the lands are covered by trees that are liable to fall and constitute a hazard to its wire or line, such public utility or transmission company may condemn such trees for a width not exceeding 100 feet on either side of the condemned land, as may be necessary or convenient for such purpose.</u></p> <p>ORS 772.210 establishes that for new transmission lines with voltage rated at 330 kV or above, an applicant has condemnation rights on lands not to exceed 300 feet in width [Emphasis added]. ORS 772.210 then establishes that, for lands not exceeding 100 feet on either side of the 100 foot corridor, condemnation is limited to trees.</p>
Page 211, Footnote 183	Typo	OAR 660-006-0025(5)(a) also requires a finding that the proposed use would not force a significant change in accepted farm practices on adjacent lands used for agriculture, which is addressed under the ORS 215. 296275(5) evaluation of this order.
Page 212	Typo	Relating to riparian restrictions, the applicant represents that, in some instances, it may not be possible to maintain timber in steam stream buffers along powerline corridors if trees do not meet minimum clearance requirements; coniferous trees could be trimmed, however "crown reduction" of deciduous trees is not recommended.
Page 213	Clarification	The project would convert 245.6 acres and 530.1 acres of forestland <u>in Umatilla County and Union County</u> , respectively,

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		which would result in losses of 0.0034 percent and 0.00059 percent of the forest lands, respectively.
Page 213	Typo	Recommended Land Use Condition 16: The certificate holder shall: a. Prior to construction, finalize and submit to the Department for its approval, a final Right-of-Way Clearing Assessment. The protected <u>protective</u> measures described in the draft Right-of-Way Clearing Assessment in Attachment K-2 of the Final Order on ASC shall be included and implemented as part of the final Right-of-Way Clearing Assessment, unless otherwise approved by the Department. b. During construction, the certificate holder shall conduct all work in compliance with the final Right-of-Way Clearing Assessment.
Page 215	Typo	During operations, the applicant proposes to minimize potential wildfire risk in forested lands from danger trees and overgrown vegetation by implementing a Vegetation Management Plan designed to comply with the American National Standards Institute (ANSI) Pruning Standards Best Management Practices for Utilities, Oregon Forest Products <u>Practices</u> Act, the U.S. Department of Labor Occupational Safety and Health Administration (OSHA), and the North American Electric Reliability Council's (NERC) Standard FAC-003-3 Transmission Vegetation Management Program (TVMP).
Page 216	Typo	Based on compliance with the Fire Prevention and Suppression Plan, the impact minimization measures included in the Right of Way Clearing Assessment, and Vegetation Management Plan, the Department recommends Council find that the proposed use would not significantly y increase the wildfire hazards, fire suppression costs, or risk to fire suppression personnel within the surrounding area.
Page 222	Typo	As reflected in the Transportation and Traffic Plan, and as would be reflected in the applicable recommended Land Use

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		conditions, during the final design phase and before construction, the certificate holder proposes to and would be required to coordinate with the affected local public works and road departments regarding any transportation-related improvements.
Page 240	Clarification to align with operative Section 106 terminology and process	Recommended Protected Areas Condition 1: During design and construction of the facility, if the proposed facility route is selected, the certificate holder must: a. Coordinate construction activities in Ladd Marsh Wildlife Area with the Wildlife Area manager. b. Provide evidence to ODFW that the certificate holder has received <u>of a determination of eligibility and findings of effect pursuant to</u> Section 106 NRHP compliance for the proposed facility, including and the final HPMP for the portion of the facility that would cross Ladd Marsh Wildlife Area <u>subject to confidential material submission procedures</u> .
Page 241	Idaho Power suggests ODOE provide an explanation of the methodology behind the noise analysis provided in the application as it relates to protected areas.	<i>IV.F.2. Potential Noise Impacts</i> <u>The applicant analyzes the potential noise impacts on protected areas by discussing the predicted noise levels resulting from construction and operation, and by discussing the predicted noise levels in the context of the ODEQ noise regulations at OAR Chapter 340, Division 35. While the ODEQ noise regulations are not decisive under the Protected Area Standard, the noise regulations analysis is relevant, along with other factors (e.g., frequency and duration), as discussed below.</u>
Page 241	Idaho Power suggests ODOE include an introductory statement at the beginning of the Construction section, summarizing its analysis and providing a citation to the relevant application materials.	<i>Construction</i> <u>In general, construction of the proposed facility would cause some de minimis noise impact at certain protected areas that are close to the proposed facility, but construction would be short-term and temporary, as would the impacts. The</u>

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		applicant's noise impact assessment to protected areas is found in ASC Exhibit L, Section 3.5.3.
Page 242	Typo	• Columbia Basie Basin Coyote Springs Wildlife Area
Page 243	Typo	The Longhorn Station would be approximately 0.7 miles from a protected area, the Columbia Basie Basin Coyote Springs Wildlife Area.
Pages 243-244	ODOE should clarify that the 27 dBA predicted noise level identified in the application and the DPO are related to the edge of the right-of-way and a noise sensitive receptor. Idaho Power also suggests omitting the statement regarding wildlife and cultural resources, because they seem irrelevant in this context.	As described further in Section IV.Q.1, Noise Control Regulations, during certain foul weather conditions and low wind, corona noise would be greater than 27 dBA at certain noise-sensitive receptors the edge of the right-of-way . It is also possible that corona noise would be audible at certain locations in protected areas very near the proposed facility. However, corona noise is never anticipated to be above 50 dBA during foul weather at any noise sensitive receptor. And At at any nearby protected area, the conditions that give rise to a louder corona noise (namely, rainy weather) likely also would limit s the users at a protected area. The Other designations of protected areas could include protection of wildlife or cultural resources; however, the low-level of corona noise, during infrequent weather conditions, is unlikely to cause a significant noise impact at these areas.
Page 244	Typo	Construction-related water use would include approximately 36.5 million gallons over an approximately 36-month period for transmission line structure foundation and Longhorn Station foundation; preparation of drilling slurry; moisture conditioning during access road construction; dust control during right-of-way clearing; station grading and site work; drilling and fire prevention; and re-seeding restoration upon construction completion.
Page 247	Typo	(3) Consideration of intensity, causation, and context (based upon Council's definition of "significant" OAR 345-001-0010(53). ...

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		d. Potential significance. significance <u>Significance</u> was determined based on if the valued scenic attributes of the protected area could persist, or not, based on the proposed facility's potential impact.
Page 252, Footnote 202	Idaho Power suggests that ODOE include findings or conclusions related to the NHOTIC undergrounding study, and consider elevating the discussion from a footnote into the main body of the DPO.	The applicant's study makes two general conclusions: 1) the costs to underground the approximately 1.6 mile 500 kV segment in this area would be very high, approximately \$98.6 to 107.6 million more than building the segment traditional overhead configuration, and 2) the ground disturbance from underground installation would be "substantially greater" than for overhead, including large amounts of cut-and-fill because the area contains hillslopes, as well as "transition stations," which are required where the transmission line transitions from aboveground to belowground. <u>The Department has reviewed the applicant's analysis and concurs with the applicant's conclusions regarding the greater expense and increased ground disturbance impacts associated with undergrounding the transmission line in this area.</u>
Page 251-252		Considering that the agency that manages the NHOTIC land and has identified the NHOTIC has as having significant or important scenic value has authorized the proposed facility in the location proposed in the ASC, the Department considers this relevant information with regard to the EFSC Protected Areas standard
Page 253-254	Idaho Power requests that ODOE add, to the Protected Area Standard discussion regarding the Owyhee River Below the Dam ACEC, information related to the management plan amendment adopted by BLM in its B2H ROD.	<u>As described in the analysis for the Scenic Resources standard, the BLM has reclassified the area crossed by the proposed facility from VRM Class II to VRM Class IV. By issuing this route in its ROD, the federal agency (BLM) that administers the Management Plan for Owyhee River is authorizing the placement of the proposed facility in this location indicating that it is permissible within the scenic designations in the Management Plan. To the extent that the Council must consider the visual impacts to the resource, the</u>

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		<u>Council may rely on the decisions of the land-managers who administer their plans to inform its evaluation of the visual impacts. Considering that the agency that manages the Owyhee River Below the Dam ACEC and has identified the Owyhee River as having significant or important scenic value has also authorized the proposed facility in the location proposed in the EFSC application, the Department considers this relevant information.</u>
Page 255	Typo	The proposed facility in this area would include the rebuild of 1.1 miles of the existing Quarts Quartz to Weiser 138-kV transmission line to a new ROW, and the 500 kV proposed transmission line would be located in the existing 138-kV transmission line ROW, which is owned and operated by the applicant.
Page 256	Idaho Power requests that ODOE add, to the Protected Area Standard discussion regarding the Birch Creek ACEC, information related to the management plan amendment adopted by BLM in its B2H ROD.	The proposed facility would conform to VRM Class II objectives within the Birch Creek Parcel, and is therefore consistent with BLM's VRM direction to protect visual values within the Birch Creek Parcel. ²¹² <u>Finally, it is important to note that the BLM has approved the proposed facility route in this area and amended the Southeastern Oregon Resource Management Plan to reclassify the area potentially impacted by the proposed facility from VRM Class III to VRM Class IV, and the Department considers this relevant information.</u>
Page 259	Typo	As is shown on Exhibit L, Attachment L-3, Figure L-3-16, the Power Cree Creek Parcel is located across I-84 from the proposed facility.
Page 273	In Recommended Retirement and Financial Assurance Condition 1, ODOE recommends that Idaho Power provide a bond or letter of credit in the amount of \$1.00 from the in-service date until in-service year 51. While Idaho Power does not disagree with the amount of the recommended assurance, Idaho Power requests that ODOE consider providing an additional option for the form of the assurance required. That is, Idaho Power requests that it be allowed to	Recommended Retirement and Financial Assurance Condition 5: . . . a. From the In-Service Date until In-Service Year 51, the amount of bond, or letter of credit, <u>or deposit</u> shall be \$1.00.

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	provide a deposit for that same amount, because there are administrative costs associated with obtaining bonds and letters of credit which would far exceed the actual value of the bond and letter of credit at issue here.																																																																																														
Page 279	Typo	• Pygmy rabbit (<i>Brachylagus idahoensis</i>) colonies}																																																																																													
Pages 280-281	Typo, see Exhibit P1, page 16, Table 10, showing mitigation ratios. The mitigation ratios for Category 3 habitat and Category 4 habitat should be the same: <1.	<p>Table FW-1: Estimated Temporary and Permanent Habitat Impacts and Proposed Mitigation</p> <table border="1"> <thead> <tr> <th rowspan="3">Habitat Category and Vegetation Type</th> <th colspan="2">Proposed Route</th> <th colspan="2">Mitigation</th> </tr> <tr> <th>Temp</th> <th>Perm</th> <th>Temp</th> <th>Perm</th> </tr> <tr> <th colspan="2">Acres</th> <th colspan="2">Acres</th> </tr> </thead> <tbody> <tr> <td colspan="5">Category 2</td> </tr> <tr> <td>Agriculture/Developed</td> <td>95.0</td> <td>10.6</td> <td rowspan="6">>1 acre: 1 acre</td> <td rowspan="6">>1 acre: 1 acre</td> </tr> <tr> <td>Bare Ground</td> <td>2.0</td> <td>0.3</td> </tr> <tr> <td>Forest/Woodland</td> <td>6.8</td> <td>536.1</td> </tr> <tr> <td>Open Water/Wetlands</td> <td>1.0</td> <td>0.5</td> </tr> <tr> <td>Riparian Vegetation</td> <td>0.6</td> <td>0.4</td> </tr> <tr> <td>Shrub/Grassland</td> <td>1,990.9</td> <td>334.2</td> </tr> <tr> <td colspan="5">Category 3</td> </tr> <tr> <td>Agriculture/Developed</td> <td>10.1</td> <td>0.8</td> <td rowspan="6"><1 acre: 1 acre</td> <td rowspan="6">1 acre: 1 acre</td> </tr> <tr> <td>Bare Ground</td> <td>0.3</td> <td>0.1</td> </tr> <tr> <td>Forest/Woodland</td> <td>16.0</td> <td>458.0</td> </tr> <tr> <td>Open Water/Wetlands</td> <td>0.4</td> <td>0.1</td> </tr> <tr> <td>Riparian Vegetation</td> <td>5.5</td> <td>0.1</td> </tr> <tr> <td>Shrub/Grassland</td> <td>312.4</td> <td>489.1</td> </tr> <tr> <td colspan="5">Category 4</td> </tr> <tr> <td>Shrub/Grassland</td> <td>165.3</td> <td>26.1</td> <td><1 acre: 1 acre</td> <td>1 acre: 1 acre</td> </tr> <tr> <td colspan="5">Category 5</td> </tr> <tr> <td>Shrub/Grassland</td> <td>329.3</td> <td>43.3</td> <td>0</td> <td><1 acre: 1 acre</td> </tr> <tr> <td colspan="5">Category 6</td> </tr> <tr> <td>Agriculture/Developed</td> <td>310.5</td> <td>259.8</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Source: ASC Exhibit P, Attachment P1-6 Table 1</p>	Habitat Category and Vegetation Type	Proposed Route		Mitigation		Temp	Perm	Temp	Perm	Acres		Acres		Category 2					Agriculture/Developed	95.0	10.6	>1 acre: 1 acre	>1 acre: 1 acre	Bare Ground	2.0	0.3	Forest/Woodland	6.8	536.1	Open Water/Wetlands	1.0	0.5	Riparian Vegetation	0.6	0.4	Shrub/Grassland	1,990.9	334.2	Category 3					Agriculture/Developed	10.1	0.8	<1 acre: 1 acre	1 acre: 1 acre	Bare Ground	0.3	0.1	Forest/Woodland	16.0	458.0	Open Water/Wetlands	0.4	0.1	Riparian Vegetation	5.5	0.1	Shrub/Grassland	312.4	489.1	Category 4					Shrub/Grassland	165.3	26.1	<1 acre: 1 acre	1 acre: 1 acre	Category 5					Shrub/Grassland	329.3	43.3	0	<1 acre: 1 acre	Category 6					Agriculture/Developed	310.5	259.8	0	0
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Page 285	Typo, Condition 13, not 14, provides for surveys	<p>Recommended Fish and Wildlife Condition 4: The certificate holder shall:</p> <p>...</p> <p>Information To Be Included in Final Habitat Mitigation Plan:</p> <p>...</p> <p>v. The results of the biological surveys referenced in Fish and Wildlife Conditions 14 13, 15 and 16</p>																																																																																													
Page 286	Clarification	<p>Recommended Fish and Wildlife Condition 5:</p> <p>...</p> <p>b. Oregon's Elk Mitigation Framework shall be used to calculate the amount of elk habitat compensatory mitigation required for the facility, and the information from the pre- and post-construction traffic studies <u>as required by Fish and Wildlife Conditions 21 and 22</u> shall be used in the calculation.</p>																																																																																													

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Page 294	Certain of this information may be considered confidential (e.g., Category 1 sage-grouse lek locations), and therefore, the condition language should specify that submittal may require procedures designed to protect that confidentiality. Idaho Power proposes additional condition language referencing those procedures, language that ODOE has used in other proposed conditions.	<p>Recommended Fish and Wildlife Condition 7: Prior to and during construction, the certificate holder shall flag the following environmentally sensitive areas as restricted work zones:</p> <ul style="list-style-type: none"> a. State protected plant species; b. Wetlands and waterways that are not authorized for construction impacts; c. Areas with active spatial and seasonal restrictions; and d. Category 1 habitat. <p>The certificate holder shall submit a mapset showing the location of environmentally sensitive areas and restricted work zones to the department for its approval, <u>subject to confidential material submission procedures</u>. The certificate holder shall make the mapset available to all construction personnel.</p>
Page 300	Typo, Condition 13, not 14, provides for surveys	<p>Recommended Fish and Wildlife Condition 12: During construction, if active pygmy rabbit colonies or the roost of a State Sensitive bat species is observed during the biological surveys set forth in Fish and Wildlife Conditions 14 <u>13</u>, 15 and 16, the certificate holder shall submit to the Department for its approval a notification addressing the following:</p>
Page 308-309	Typo	<p>Recommended Fish and Wildlife Condition 16: Prior to construction, the certificate holder shall conduct, as applicable, the following biological surveys on all portions of the site boundary, regardless of whether those portions have been surveyed at the time of issuance of the site certificate, based on the survey protocols included in ASC Exhibit P Attachment P1-2 Revised Final Biological Survey Work Plan, unless otherwise approved by the Department in consultation with ODFW:</p> <p>...</p> <ul style="list-style-type: none"> e. Greater sage-grouse, as necessary for the State of Oregon to calculate the amount of sage-grouse habitat compensatory

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		mitigation required for the facility used <u>using</u> Oregon's Sage-Grouse Habitat Quantification Tool.
Page 309	Clarification	In July 2015, the Oregon Department of Fish and Wildlife (ODFW) <u>Oregon Fish and Wildlife Commission (OFWC)</u> adopted <u>amended its</u> sage-grouse conservation rules at OAR 635, Division 140, to specifically address the impacts of development to the sage grouse. In March 2016, the Fish and Wildlife Commission adopted <u>amended its</u> Sage-Grouse Conservation Policy <u>Fish and Wildlife Habitat Mitigation Policy to reference the rules at OAR 635, Division 140 and provide specific guidance for developments in sage-grouse habitat</u> , which states, at OAR 635-415-0025(7): . . .
Page 316	Typo	Recommended Fish and Wildlife Condition 17: At least 90 days prior to construction of a facility phase or component in sage-grouse habitat as mapped by The <u>the</u> Oregon Department of Fish and Wildlife (ODFW) at that time, unless otherwise agreed to by the Department, the certificate holder shall finalize, and submit to the Department for its approval, in consultation with ODFW, a final Sage-Grouse Habitat Mitigation Plan. . . .
Page 317	Clarification	Recommended Fish and Wildlife Condition 19: During the third year of operation, the certificate holder shall provide to the Department and ODFW the information necessary for <u>data from the traffic studies in Recommended Fish and Wildlife Conditions 21 and 22 for</u> ODFW to calculate the final amount of indirect impact from facility roads to sage-grouse habitat and corresponding compensatory mitigation required using Oregon's Sage-Grouse Habitat Quantification Tool. . . .
Page 318	Typo	The Land Conservation and Development Commission (LCDC) implemented, concurrently with the ODFW <u>OFWC</u> , sage-grouse habitat conservation rules into the Oregon land use planning rules.
Page 326	Typo	As discussed above, the amount of sage-grouse habitat compensatory mitigation required for the proposed

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		transmission line will be determined by the Sage-Grouse Habitat Quantification Tool.
Page 328	Typo	As further described in Section IV.H, Fish and Wildlife Habitat, as well as in Exhibit Q, the applicant prepared a Biologist Biological Survey Work Plan to guide field surveys that would be used in support of the application.
Page 333	Typo	In additional addition to records of the species occurring in the analysis area, facility-specific field surveys identified three active WAGS colonies in Morrow County on or adjacent to the NWSTF Boardman.
Page 334	Typo	The removal work would be accomplished either by hand-crews on foot, or by using helicopters to remove the structures without ground disturbance, or by cutting off poles but leaving foundations in place.
Page 338	Typo	The applicant's assessment of surveys results and anticipated impacts is included d in Exhibit Q, Section 3.4.2.3.
Page 339	Typo	The applicant's impact analysis to each plant species with historic or field-verified occurrences in the analysis area is included d in a series of tables in Exhibit Q.
Page 339-340	Typo	This survey information would be used to microsite facility components, to the extent possible, to avoid direct impacts to resources include including threatened and endangered plants.
Page 340	Typo	Additionally, as would be required under the Reclamation and Revegetation Plan, site specific reclamation monitoring would be required after construction in order that areas of temporary disturbance area be restored.
Page 346	Typo	However, the Department notes that in order to be considered a "scenic resource" for purposes of evaluation under the EFSC Scenic Resources standard, a resources s must be "identified as significant or important in local land use plans, tribal land management plans, and federal land management plans.

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Page 355	Typo	The language of the EFSC Scenic Resources standard relies upon scenic values identified in others' management plans, so the Council may rely on the decisions of the land-managers who administer their plans to inform its evaluation of the Scenic Resources standard. Considering that the agencies that manages many of these Scenic Resources have already authorized the proposed facility in the location proposed in the EFSC application, the Department considers this relevant information particularly to the EFSC Scenic Resources standard. The BLM and USFS have already issued records of decisions (RODs) authorizing the proposed facility.
Page 361	Typo	As described above, the VRM Class II designation means that in accordance with the applicant's proposed methods for establishing scenic resources that should be afforded review and protection under the EFSC Scenic Resources standard, VMR <u>VRM</u> Class II managed areas should be considered under the EFSC Scenic Resources standard.
Page 369	Typo	As described in Section IV.F., Protected Areas, the proposed facility in this area would include the rebuild of 1.1 miles of the existing Quartz <u>Quartz</u> to Weiser 138-kV transmission line to a new ROW, and the 500 kV proposed transmission line would be located in the existing 138-kV transmission line ROW, which is owned and operated by the applicant.
Page 370	Idaho Power requests that ODOE add, to the Scenic Resources Standard discussion regarding the Birch Creek ACEC, information related to the management plan amendment adopted by BLM in its B2H ROD.	Finally, it is important to note that the BLM has approved the proposed facility route in this area <u>and amended the Southeastern Oregon Resource Management Plan to reclassify the area potentially impacted by the proposed facility from VRM Class III to VRM Class IV, and the Department considers this relevant information.</u>
Page 370	Typo, for consistency with other conditions, ODOE should consider describing the milepost numbers from least to greatest rather than greatest to least.	Recommended Scenic Resources Condition 3: During construction, to avoid significant adverse impacts to the scenic resources at the Birch Creek Area of Critical Environmental Concern, the certificate holder shall construct the facility using tower structures that meet the following

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		criteria between Milepost 199.1 and Milepost 197.9 <u>Milepost 197.9 and Milepost 199.1</u> : a. H-frames; and b. Tower Height no greater than 100 feet
Page 371	Typo	Scenic quality of the existing landscape for <u>is</u> considered low.
Page 372	Typo	The area crossed by the proposed facility was formerly designated as VCM <u>VRM</u> Class II, but the BLM amended its plan as part of its ROD for the B2H project, and the area is now designated VRM Class IV.
Page 374	Typo	The proposed facility in this area would be located in the USFS Wallowa-Whitman National Forest, and the USFS has approved the proposed facility in this <u>its</u> ROD.
Page 375	Typo	As with the Wallowa-Whitman VQO1 area, the proposed facility in the VQO2 area would be located in the USFS Wallowa-Whitman National Forest, and the USFS has approved the proposed facility in this <u>its</u> ROD.
Page 376	Typo	Also, in this area the proposed route is mostly located in the USFW <u>USFS</u> designated utility corridor, which was established for siting utility facilities such as transmission lines.
Page 398	Typo	In December 2018, the Department issued a requests for additional information (RAIs), requesting that the applicant re-visit the information provided in ASC Exhibit S, Table S-2 and re-evaluate whether or not there will indeed be any direct impacts to eligible resources, including Oregon Trail segments.
Pages 447-448	Idaho Power and the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) have agreed to the certain processes set out in Idaho Power's proposed new subsection (2) to ensure Idaho Power will meaningfully engage with the CTUIR. Idaho Power requests that ODOE/EFSC include those processes as outlined here. Also, clarification and typo	Recommended Historic, Cultural, and Archaeological Resources Condition 2: Prior to construction of a phase or segment of the facility, subject to confidential material submission procedures, and based on 1) new survey data from previously unsurveyed areas and 2) the final design of the proposed facility, the certificate holder shall submit to the Department, the State Historic Preservation Office (SHPO), and applicable Tribal Governments, for review and

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		<p>Department approval a final Historic Properties Management Plan (HPMP).</p> <p>1. The final HPMP shall include, <u>unless otherwise approved by the Department</u>:</p> <ul style="list-style-type: none">a. The provisions outlined in the Attachment S-9 to the Final Order on the ASC, updated as applicable;b. A revised High Probability Areas Assessment and revised Inadvertent Discovery Plan;c. Updated information to reflect process updates described in the Final Order on the ASC with respect to EFSC historic, cultural, and archaeological resource information to align with the Section 106 federal review;d. Final eligibility determinations for newly identified resources and previously inventoried resources, with supporting documentation (final Cultural Resources Technical Report, ILS, RLS), from the lead federal agencies;<ul style="list-style-type: none">i. Based on the final eligibility determinations, identify which resources qualify for protections under OAR 345-022-0090(1)(a) through (c);ii. Submit a revised table of resources inventoried including, at a minimum, the resource information included in ASC Exhibit S, Table S-2 or Table HCA-3 of the Final Order on the ASC;e. Identification of resources not protected under OAR 345-022-0090(1)(a) due to a final eligibility determination of "not eligible for listing on the National Register of Historic <u>Properties Places</u> (NRHP)," yet may qualify for protections under OAR 345-022-0090(1)(b) or (c). The HPMP shall also include the following information for resources under OAR 345-022-0090(1)(b) for Department approval, in consultation with SHPO:<ul style="list-style-type: none">i. Applicant recommendations and supporting documentation to demonstrate if the resource qualifies as an archaeological object or site under ORS 358.905(1)(a) and ORS 358.905(1)(c).
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		<p>ii. A proposed site-specific impact assessment including avoidance, minimization and/or mitigation measures for the resource.</p> <p>f. Final site-specific impact (direct and indirect) avoidance measures and an impact assessment for a phase or segment of the facility, or specific facility component, including avoidance measures in Historic, Cultural, and Archaeological Resources Condition 1;</p> <p>g. Final site-specific impact (direct and indirect) minimization measures based on final design of a phase or segment of the facility, or specific facility component;</p> <p>h. Final site-specific impact (direct and indirect) mitigation measures based on final design of a phase or segment of the facility, or specific facility component;</p> <p><u>2. Before the certificate holder submits the final HPMP to the Department, the certificate holder shall provide the Confederated Tribes of the Umatilla Reservation (CTUIR) the following opportunities to review and comment on the HPMP:</u></p> <p><u>i. When the certificate holder begins to finalize the HPMP, the certificate holder shall notify the CTUIR that the certificate holder is beginning to finalize the HPMP and shall request that the CTUIR provide written comments within 60 calendar days from said notice. If requested by the CTUIR, the certificate holder shall reasonably attempt to meet in-person with the CTUIR prior to the 60-day deadline to discuss the HPMP; however, the timing of the in-person meeting will not affect the CTUIR's obligation to provide comments by the 60-day deadline.</u></p> <p><u>ii. The certificate holder shall provide to the CTUIR a copy of the revised HPMP along with written responses to any CTUIR comments received within the 60-day window set forth above in subsection (2)(i) of this condition. The certificate</u></p>
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		<p><u>holder shall request that the CTUIR provide written comments on the revised HPMP within 60 calendar days. If requested by the CTUIR, the certificate holder shall reasonably attempt to meet in-person with the CTUIR prior to the 60-day deadline to discuss the revised HPMP; however, the timing of the in-person meeting will not affect the CTUIR's obligation to provide comments by the 60-day deadline.</u></p> <p><u>iii. When the certificate holder submits the final HPMP to the department, the certificate holder shall provide to the CTUIR written responses to any CTUIR comments received within the 60-day window set forth above in subsection (2)(ii) of this condition.</u></p> <p><u>2-3.</u> The certificate holder shall conduct all construction activities in compliance with the final Department-approved HPMP.</p>
Page 449	Based on Idaho Power's experience, the final Cultural Resources Technical Report will take longer than one year to complete. Idaho Power requests an additional two years.	Recommended Historic, Cultural, and Archaeological Resources Condition 3: Within one year <u>three years</u> after construction is completed , the certificate holder shall finalize, and submit to the Department for its approval, a final Cultural Resources Technical Report. . . .
Page 453-454	Clarification	<p>The applicant analyzes the potential noise impacts on recreational opportunities by discussing predicted noise levels resulting from the construction and operation of the proposed facility, and by analyzing discussing the potential predicted noise impacts levels under in the context of the ODEQ noise regulations at OAR Chapter 340, Division 35. Evidence of complying with the DEQ regulations is not necessarily definitive of compliance with the Recreation standard; however, it is relevant to that analysis <u>While the ODEQ noise regulations are not decisive under the Recreation Standard, the noise regulations analysis is relevant,</u> along with other factors (e.g., frequency and duration), as discussed below.</p>

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Pages 454-455	Typo	As described in the evaluation of the applicant's visual impact assessment for each of the four recreational opportunities crossed by proposed facility components, permanent visual impacts of the facility would not result in alteration of the recreational opportunity such that the resources would no longer be considered important.
Page 456	<p>ODOE should clarify that the 27 dBA predicted noise level identified in the application and the DPO are related to the edge of the right-of-way and a noise sensitive receptor.</p> <p>Idaho Power also suggests omitting the statement regarding wildlife and cultural resources, because they seem irrelevant in this context.</p>	As described further in Section IV.Q.1., Noise Control Regulations, during certain foul weather conditions and low wind, corona noise would be greater than 27 dBA at certain noise sensitive receptors <u>the edge of the right-of-way</u> . It is also possible that corona noise would be audible at certain locations in recreation opportunity sites very near the proposed facility or crossed by the proposed facility. However, corona noise is never anticipated to be above 50 dBA during foul weather at any noise sensitive receptor. And At <u>at</u> any nearby recreation opportunity, the conditions that give rise to a louder corona noise (namely, rainy weather) likely also <u>would</u> limits the users at a recreation area. <u>The low-level of corona noise, during infrequent weather conditions, is unlikely to cause a significant noise impact at these areas.</u>
Page 461	Typo	See Section IV.M.6., Public Services – Traffic Safety, and Recommended Public Services Condition 1 which requires the applicant to generate and submit for approve approval a county-specific Transportation and Traffic Plan, which would identify final construction routes and include traffic controls.
Page 462	Typo	The city asked that a condition of approval be included in the site certificate requiring that, if approved by Council and ehoses <u>chosen</u> to be built by the applicant, that the Morgan Lake alternative use H-frame structures with natina finish (which mimics a wood-like look).
Page 462	Morgan Lake Park is considered in the EFSC process as an important recreation opportunity and evaluated for compliance with the Council's Recreation Standard, but is not	Recommended Recreation Condition 1: If the Morgan Lake alternative facility route is selected, the certificate holder shall construct the facility using tower structures that meet

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<p>separately evaluated as a Scenic Resource because the applicable management plan for Morgan Lake Park, the Morgan Lake Recreational Use and Development Plan, did not identify Morgan Lake Park as an important scenic resource. Accordingly, while Idaho Power did evaluate potential visual impacts associated with the project, it is important to also note that, per the Morgan Lake Recreational Use and Development Plan, there are no specific scenic views or values associated with the Morgan Lake Park that are regarded as particularly important for purposes of compliance with the Recreation Standard. Idaho Power's analysis of visual impacts focused on the elements of Morgan Lake Park that are most important for the recreation activities at the park, which include camping, picnicking, fishing, and boating.</p> <p>ODOE provides analysis regarding the potential impacts of the Morgan Lake Alternative on Morgan Lake Park and proposed Recommended Recreation Condition 1, which would require the use of H-frames to mitigate visual impacts. According to ODOE's analysis, the visual impacts to Morgan Lake Park include that the Morgan Lake Alternative "would be visible from portions of the park, primarily the access road and parking areas," and "vegetation located along the southern perimeter of the lake would screen views from campsites and locations on the water." ODOE expressed concern about whether vegetation screening would block all views of the Morgan Lake Alternative, particularly during the winter when deciduous vegetation falls from trees. ODOE also noted that "the City of La Grande objected to the proposed Morgan Lake alternative's impacts, particularly visual impacts, to the recreational opportunities at Morgan Lake Park" and requested that a condition of approval be included in the site certificate requiring that, if approved by</p>	<p>the following criteria for <u>the segment of</u> the transmission line that would be visible from Morgan Lake Park, specifically between <u>miles 5-7 Milepost ML 7/1 through Milepost ML 7/4</u> of the Morgan Lake alternative, as shown on ASC Exhibit C, Attachment C-3, Map 8.</p> <ul style="list-style-type: none">a. H-frames;b. Tower height no greater than 130 feet; andc. Weathered steel (or an equivalent coating).
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	<p>Council and chosen to be built by the applicant, that the Morgan Lake alternative use H-frame structures with natina finish (which mimics a woodlike look). ODOE indicated that it agreed with the City of La Grande's assessment and request for mitigation.</p> <p>Idaho Power disagrees that the evidence in the record indicates there will be a significant adverse impact to the Morgan Lake Park that would require mitigation to be included as part of the site certificate. In Idaho Power's analysis of the potential impacts of the Morgan Lake Alternative on Morgan Lake Park in Exhibit T of the ASC, Idaho Power considered both traffic impacts and visual impacts and concluded that the project would not have a significant adverse impact on the resource. <i>See</i> ASC, Exhibit T at page T-44. Specifically, with respect to potential visual impacts, Idaho Power concluded towers would be visible in certain areas of the park, but also would be screened by vegetation which would block views of the towers from most locations in the park, so viewer perception could be intermittent and peripheral while viewers are moving through the park, but could also be continuous and/or head-on while engaging in activities such as camping, picnicking, and fishing. Idaho Power concluded that although the Project will introduce moderate contrast to the landscape, it will not preclude visitors from enjoying the day use and overnight facilities offered at Morgan Lake Park, and accordingly, the visual impacts to Morgan Lake Park would be less than significant for purposes of complying with the standard. Idaho Power's analysis demonstrates there is no adverse impact to the resource, and to the extent that the transmission line may be partially visible from some locations in the park, Idaho Power believes (1) those locations are not the primary recreation areas for the park (e.g., the entrance</p>	
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	<p>road) and do not merit the same level of protection that would be afforded to other areas of the resource that are the focus of the recreation activities; and (2) the fact that the transmission line may be visible from some locations in the park does not presuppose the conclusion that there is a "significant adverse impact" for purposes of the Recreation Standard. Importantly, ODOE did not provide a conclusion that the project, without mitigation, would result in a significant adverse impact and did not present any analysis independent from Idaho Power's analysis. Similarly, the request presented by the City of La Grande in its comments (dated April 27, 2018) is conclusory, conflating potential visibility of the transmission line with an adverse impact, and is not based on any independent analysis or record evidence. Accordingly, Idaho Power recommends that ODOE eliminate the Recommended Recreation Condition 1.</p> <p>While Idaho Power finds that ODOE's Recommended Recreation Condition 1 is not supported by evidence in the record, Idaho Power nonetheless points out that the specific request by the City of La Grande was for "a condition of approval . . . that for the approximately 1.5 miles of the line that would be in view from Morgan Lake that H Frame towers be used to help mitigate the adverse impact to the view shed." City of La Grande Comments, April 27, 2018 at page 2. Thus, it is clear the intent of the request was to require H-frames for the portion of the transmission line that would be visible from Morgan Lake, not from every part of the park. Moreover, the City of La Grande and Idaho Power have entered into an outside agreement for recreational improvements at Morgan Lake Park in lieu of H-frames to address any potential visual or traffic related impacts; and therefore, the impetus for ODOE's condition (i.e., the City's request) is now moot.</p>	
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	<p>Idaho Power does not concede that intermittent visibility of the transmission line from Morgan Lake Park would result in an adverse impact or a requirement for mitigation. Even so, Idaho Power prepared the attached visual simulation to show that, if ODOE continues to recommend H-frames near Morgan Lake, ODOE should reduce the number of towers that would need to utilize H-frames from seven towers (the towers between MP 5 and MP 7 of the Morgan Lake Alternative) to four towers. See also the annotated version of Exhibit C, Map 8 showing the tower structure numbering, which we also attached. The simulation shows the transmission line from the main parking lot area at the lake where the boat dock and restroom facilities are located. Idaho Power chose this location because it represents a high-traffic area where most users of the park will interact with the park's recreation opportunities. For the simulation, Idaho Power modeled H-frames for towers ML 7/4, ML 7/3, ML 7/2, and ML 7/1 as recommended by ODOE, but for the remaining three towers (ML 6/3, 6/2, and ML 6/1), Idaho Power modeled lattice towers. As seen in the simulation, the lattice towers at ML 6/3, 6/2, and ML 6/1 are screened by coniferous vegetation and topography, and present no significant visual impact. Therefore, if ODOE recommends H-frames in this area, it is unnecessary to include ML 6/3, 6/2, and ML 6/1 in that recommendation.</p> <p>Finally, if ODOE rejects Idaho Power's request to eliminate ML 6/2 and ML 6/1 from the H-frame requirement, Idaho Power requests that ODOE amend the tower height limitation in the condition from 130 feet to 135 feet. Our preliminary engineering analysis of h-frames in this area indicates that ML 6/1 likely would need to be at least 135 feet tall to meet minimum ground clearance requirements. However, if ODOE</p>	<p>Note: If ODOE continues to recommend H-frames for ML 6/2, the tower height limitation above should be increased to 135 feet: b. Tower height no greater than 130 <u>135</u> feet;</p>
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	<p>agrees with Idaho Power's request to eliminate ML 6/2, the minimum height of 130 is achievable.</p>	
<p>Page 462, Footnote 412</p>	<p>Idaho Power agrees with ODOE's findings in this footnote that the City of La Grande is not a recreation resource, scenic resource, or protected area, and that visual impact mitigation in the form of H-frame towers or other mitigated structure types in the viewshed of La Grande are not warranted under EFSC's standards. However, without waiving Idaho Power's positions on those points which Idaho Power expressly reserves, Idaho Power and Union County have entered into an outside agreement whereby Idaho Power has agreed to use, as a design feature choice, H-frame towers along the La Grande viewshed, specifically MP 106/2 through 108/5.</p>	<p>Footnote 412: . . . The City of La Grande has also asked for the H-frame structure mitigation design feature to be used if the applicant selects the proposed facility route in areas that are visible from the City of La Grande. However, the Department points to the specific Council rule and standard that would require such mitigation for viewshed impacts to the City itself based on requirements stipulated in the rule or standard. The Council has three standards that consider visual impacts: Recreation, Scenic Resources, and Protected Areas. The City of La Grande is not a recreation resource, scenic resource, or protected area, and the Department does not find that visual impact mitigation in the form of H-frame towers or other mitigated structure types in the viewshed of La Grande are warranted. B2HAPPDoc ApASC Reviewing Agency Comment City of La Grande_Strope 2018-04-27. <u>However, the Department notes that Idaho Power and Union County have entered into an agreement outside of the EFSC process whereby Idaho Power would use H-frame towers along the La Grande viewshed as a design feature choice and the Department recommends that Council include the following condition recognizing that design feature decision:</u></p> <p style="text-align: center;"><u>Recommended Condition: If the Proposed Route is selected, the certificate holder shall construct the facility using tower structures that meet the following criteria for the transmission line that would be visible from the City of La Grande, specifically between Milepost 106/2 and Milepost 108/5:</u></p> <p style="text-align: center;"><u>a. H-frames; and</u> <u>b. Weathered steel (or an equivalent coating).</u></p>

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Page 468	Typo	In this area, the facility would be located in the right of way of an existing 138 kV transmission line, and a rebuild of 1.1 miles of the existing Quartz <u>Quartz</u> to Weiser 138-kV transmission line.
Page 468	Typo	In addition, to further mitigate the visual impact, and as described above, the applicant proposes to use shorter stature H-frame <u>H-frames</u> structures to maximize the proportion of the transmission line screened from view by existing topography.
Page 469	Idaho Power requests that ODOE add, to the Recreation Standard discussion regarding the Birch Creek ACEC, information related to the management plan amendment adopted by BLM in its B2H ROD.	With the mitigation, very little of the proposed facility is anticipated to be visible from this location. <u>Additionally, it is important to note that the BLM has approved the proposed facility route in this area and amended the Southeastern Oregon Resource Management Plan to reclassify the area potentially impacted by the proposed facility from VRM Class III to VRM Class IV, and the Department considers this relevant information.</u>
Page 472	Idaho Power requests that ODOE add, to the Recreation Standard discussion regarding the Owyhee Below the Dam ACEC, information related to the management plan amendment adopted by BLM in its B2H ROD.	The ACEC/SRMA is owned and managed by the BLM, and the BLM has already approved the facility in this area via its ROD <u>and reclassified the area crossed by the proposed facility from VRM Class II to VRM Class IV. Considering that the agency that manages the Owyhee River Below the Dam ACEC and has identified the Owyhee River as having significant or important scenic value has also authorized the proposed facility in the location proposed in the EFSC application, the Department considers this relevant information.</u>
Page 473	Typos	Grande Tour Scenic Bikeway The proposed facility would cross the Grande Tour Scenic Bikeway at approximately milepost 126, near the City of North Powder in Union County.

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		<p>...</p> <p>Based on the analysis presented here, the Department recommends that the Council find that the proposed facility would not cause a significant adverse impact to the recreational opportunities at the Grande Tour Scenic Bikeway.</p>
Page 473, Footnote 427	Idaho Power requests that ODOE include in this footnote a statement recognizing that Idaho Power and Morrow County have entered into an outside agreement for improvements at one of the bikeway rest stops.	Footnote 427: Id. See Section 3.4.4.20 and Attachment T-3 Section 3.21 for the applicant's evaluation of the proposed facility's anticipated impacts to the resource. <u>The Department notes that Idaho Power and Morrow County have entered into an agreement outside of the EFSC process for certain improvements along the Blue Mountain Century Scenic Bikeway.</u>
Page 482	Typo	Minimal amount of solid waste, such as household wastes listed above will be generated by the operation personal <u>personnel</u> at the Longhorn Station.
Page 496	Typos	The applicant explains that construction of the proposed facility is not expected to result in damage to existing roads, bridges, or overhead power distribution lines, however there will <u>be</u> the need to improve some local roads to accommodate oversize truck deliveries. In its letters on the ApASC and on the ASC, the City of La Grande, a reviewing agency for the proposed facility, expressed concerns about impacts to proposed access roads within its jurisdiction and requested that the applicant provide detailed information and coordinate with the City.
Page 499-500	Idaho Power contacted John Wilson at the Oregon Department of Aviation to determine the "vicinity" within which Idaho Power would need to provide notice to airmen. Mr. Wilson indicated there is no standard minimum distance for providing notice; instead, Mr. Wilson recommended that Idaho Power coordinate with ODA prior to construction to determine the airports at which notice would need to be provided.	Recommended Public Services Condition 2: <p>...</p> <p>i. At least 30 days prior to initiating helicopter operations, the certificate holder shall <u>provide consult with the Oregon Department Aviation regarding the preparation and posting of</u> notices to airmen regarding the location and nature of work being performed. The notice will be posted at each of the <u>public</u> airports in the vicinity of the facility to alert other</p>

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		aviators of the location and timing of facility-related helicopter construction activities; an
Page 502	Typo	New roads will have access control based on travel management plan designations for the area, and the likelihood of access control being effective. Improved existing roads and some open new roads on BLM-managed and USFS lands are not anticipated to increase demands on law enforcement because they are not anticipated to result in a significant increase in public use.
Page 524	Typo	OPUC Order No. 18-176 (OPUC acknowledgement of the applicant's 2-017 IRP) acknowledges both the ongoing permitting, planning, and regulatory filings and to conduct preliminary construction activities, acquire long-lead materials, and to construct the proposed facility.
Page 524	Typo	Therefore, the Department points the Council to the language of the standard and that because <u>because the OPUC's order included acknowledgment of construction-related activities, the applicant has demonstrated the need for the facility under OAR 345-023-0020(2); has been met,</u> "The Council shall find that a least-cost plan meets the criteria of an energy resource plan described in section (1) if the Public Utility Commission of Oregon has acknowledged the least cost plan," that and accordingly the applicant has demonstrated the need for the facility under OAR 345-023-0005(1), and the Council must find that the Need Standard has been met.
Page 536	Idaho Power believes that the condition requiring grounding and bonding throughout the life of the project is unreasonable and beyond the letter of the rule. First, requiring Idaho Power to be responsible for grounding and bonding costs does not allow for Idaho Power and the landowners to negotiate a different mutually-acceptable resolution. During right of way negotiations, Idaho Power will educate landowners about induced currents and negotiate ways to address infrastructure on the property that's at risk	Recommended Siting Standards for Transmission Lines Condition 3: . . . b. The certificate holder shall develop and implement a program that provides reasonable assurance that <u>induced currents on</u> all fences, gates, cattle guards, trailers, or other objects or structures of a permanent nature <u>are as low as reasonably achievable</u> that could become inadvertently charged with electricity are grounded or bonded throughout

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 Idaho Power's Comments on the Draft Proposed Order**

	<p>for induced currents. However, the costs of addressing that infrastructure may be negotiated separately or may instead be incorporated into a unified landowner payment. In that sense, the requirement to pay the costs would interfere with the normal right-of-way negotiation process. Second, the requirement that Idaho Power ensure any infrastructure or equipment installed after construction also be grounded or bonded is unreasonable and unduly burdensome. As mentioned above, the standard practice is to address grounding and bonding of equipment up front, but after that, the landowner is educated on induced currents and if the landowner ignores those warnings and installs infrastructure or equipment too close to the transmission line, then it's the landowner's responsibility to address the issue, not Idaho Power's. The proposed condition would require Idaho Power to constantly inspect the landowner's equipment or infrastructure, something that is beyond industry practice and likely something the landowner does not want—that is, landowners generally want as few visits as possible, and ODOE's proposal would drastically increase the number of inspection visits. Finally, if ODOE is suggesting that Idaho Power would be responsible for equipment outside the right-of-way, that would require inspections beyond the company's legal rights. For these reasons, ODOE should re-word this proposed condition.</p>	<p>the life of the line. The certificate holder shall be responsible for any costs associated with grounding or bonding of permanent infrastructure such as are required for compliance with this condition.</p>
<p>Pages 536-537</p>	<p>Typo, language seems redundant or out of place</p>	<p>Recommended Siting Standards for Transmission Lines Condition 5: During operation, the certificate holder shall: . . . b. File the following required information with the Commission <u>before January 2 of each even-numbered year, as required by ORS 758.013:</u> i. 758.013 Operator of electric power line to provide Public Utility Commission with safety information; availability of information to public utilities. (1) Each person who is</p>

**Boardman to Hemingway Transmission Line Project
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		<p>subject to the Public Utility Commission's authority under ORS 757.035 and who engages in the operation of an electric power line as described in ORS 757.035 must provide the commission with the following information before January 2 of each even-numbered year:</p> <p>a. i. The name and contact information of the person that is responsible for the operation and maintenance of the electric power line, and for ensuring that the electric power line is safe; and</p> <p>b. ii. The name and contact information of the person who is responsible for responding to conditions that present an imminent threat to the safety of employees, customers and the public.</p> <p>c. In the event that the contact information described in subsection (1) of this section <u>above in Siting Standards for Transmission Lines Condition 5(b)</u> changes or that ownership of the electric power line changes, the person who engages in the operation of the electric power line must notify the commission of the change as soon as practicable, but no later than within 90 days.</p> <p>...</p>
Page 537	Subsection d. is a requirement or action the OPUC would undertake, not Idaho Power; and therefore, d. should be deleted.	<p>Recommended Siting Standards for Transmission Lines Condition 5: During operation, the certificate holder shall:</p> <p>...</p> <p>d. If the person described in subsection (1) of this section is not the public utility, as defined in ORS 757.005, in whose service territory the electric power line is located, the commission shall make the information provided to the commission under subsection (1) of this section available to the public utility in whose service territory the electric power line is located. [2013 c.235 §3]</p>
Page 552	Idaho Power disagrees with ODOE's recommendation that the noise rule exception and variance should apply only to the certain 36 NSRs identified as potentially experiencing	See comment.

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	<p>exceedances. Instead, the exception and variance should be granted for the transmission line project as a whole. The ambient antidegradation standard regulates the noise originating from noise sources. ODEQ's definition of the term "industrial or commercial noise source" makes clear that the noise source to be regulated is that which <i>generates</i> industrial or commercial noise levels. See OAR 340-035-0015(23). Accordingly, the particular noise source is the subject of the regulation, not the properties affected by the noise. And, in turn, an exception or variance to that regulation should similarly apply to the noise source. Therefore, Idaho Power recommends that the exception and variance be granted for entire noise source, which is the entire transmission line. To the extent that the Council limits the scope of the exception and variance, the Council may consider granting the exception and variance to Idaho Power as the owner of the facility; or identifying the portions of the transmission line corresponding to the 36 NSR locations, authorizing the exception and variance for those portions of the transmission line, and concluding that the remainder of the transmission line complies with the ODEQ Noise Control Regulations.</p>	
<p>Page 554</p>	<p>ODOE's Recommended Noise Control Condition 2 provides a process for addressing potential noise complaints that may arrive after the site certificate or after construction. To the extent that ODOE recommends that the Council limit the scope of an exception or variance to the portions of the transmission line corresponding to the 36 NSR locations, Idaho Power requests the Council also make clear that any additional NSRs that may be identified after issuance of the site certificate are excepted under OAR 340-035-0035(6)(b), which provides an exception for "[i]ndustrial or commercial facilities previously established in areas of new development of noise sensitive property." While the transmission line will</p>	<p><i>Protection of Health, Safety, and Welfare of Oregon Citizens</i> . . . <u>The Council's siting process includes an analysis of potential noise impacts to those noise sensitive properties in existence and identified at the time of the Council's decision. The Council's procedures for review of the ASC, issuance of the DPO, Proposed Order, and site certificate are public processes with many opportunities for public notice and comment. Through these processes, the potential locations of the transmission line—the noise source—is made known to the public. The site certificate provides that the certificate holder must construct the facility components within the site</u></p>

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	<p>be constructed in phases, and would not be fully constructed and operational immediately upon issuance of the site certificate, because landowners will be on notice regarding the location for the transmission line as defined in the site boundary at the time of the issuance of the site certificate, EFSC may consider issuance of the site certificate as the establishment of the transmission line for purposes of the exception under OAR 340-035-0035(6)(b). <i>See also</i> ORS 469.401(2). Similar to the approach in the Council's Final Order on Biglow Canyon Amendment #2, Idaho Power asks that the Council authorize an exception for any new development of noise-sensitive property, including residences.</p>	<p><u>boundary, which is a limited and defined area. The siting process involves notice to surrounding landowners of the potential presence of the new noise source. Any landowner who intends to develop a new noise sensitive use, such as a personal residence, should consider the actual or potential presence of facility components and any potential adverse health, safety, or welfare impacts from the noise they produce. Moreover, as provided in the Recommended Noise Control Condition 2, any such landowners developing a new noise sensitive property after issuance of the site certificate will still benefit from the process and protections afforded to all landowners for addressing noise complaints, including potential mitigation options for any verified exceedance.</u></p> <p>Feasibility and Cost of Noise Abatement ... <u>Idaho Power will be required to minimize operational noise associated with the transmission line to the extent feasible through the measures described in the Recommended Noise Control Condition 3. These measures include using a triple bundled configuration for 500 kV transmission lines, maintaining tension on all insulator assemblies to ensure positive contact between insulators, and protecting the conductor surface to minimize scratching or nicking. Consistent with the findings in the DPO at 556, however, additional noise abatement measures such as insulators, silencers, and shields, are not reasonable technologies for transmission lines due to length, safety, and operational considerations.</u></p> <p><i>Past, Present, and Future Patterns of Land Use and Relative Timing of Land Use Changes</i> ...</p>
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Boardman to Hemingway Transmission Line Project
 Idaho Power's Comments on the Draft Proposed Order

		<p><u>A large percent of the land in the immediate vicinity of the project is currently zoned as Goal 3 (agricultural land) or Goal 4 (forestland). Idaho Power is unaware of any future land use zoning changes for the land in the project area.</u></p> <p><i>Legal Constraints</i></p> <p>...</p> <p><u>While Idaho Power will seek to obtain easements for the transmission line right of way from landowners, Idaho Power cannot forbid the construction of new noise sensitive uses outside the boundaries of the right-of-way or by other landowners with whom Idaho Power does not have a contractual relationship. Accordingly, Idaho Power cannot legally prevent landowners from developing a new noise sensitive property in many situations. Additionally, once issued, the site certificate will govern the location of the transmission line within the site boundary, or micro-siting corridor, so Idaho Power would not be able to relocate the transmission line to avoid any new noise sensitive properties.</u></p>
Page 554-555	ODOE should clarify that Idaho Power would be required to submit weather information, as it relates to a noise complaint, only to the extent that the complainant supplies that information to Idaho Power. ODOE should not put the onus on Idaho Power to research and identify weather information, where the complainant is in the best position to do so.	<p>Recommended Noise Control Condition 2:</p> <p>...</p> <p>b. The certificate holder shall notify the Department within three working days of receiving a noise complaint related to the facility. The notification shall include the date the certificate holder received the complaint, the nature of the complaint, weather conditions of the date for which the complaint is based (including wind speed, temperature, relative humidity, and precipitation) <u>as described by the complainant</u>, duration of perceived noise issue, the complainant's contact information, the location of the affected property, and a schedule of any actions taken or planned to be taken by the certificate holder (including inspection and maintenance actions, or actions taken or</p>

**Boardman to Hemingway Transmission Line Project
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		planned to be taken pursuant to the processes described in subsections c and d of this condition). ...
Page 555	Idaho Power suggests that ODOE clarify that it shall be the deciding authority in the event of a dispute over sound monitoring data.	Recommended Noise Control Condition 2: ... <u>c. iv. In the event of a dispute regarding complainant's noise data and the certificate holder's data from site specific sound monitoring, the Department shall make the final determination regarding which data will be used to determine whether corona noise exceeds the ambient antidegradation standard.</u>
Page 555	Idaho Power suggests, if an agreement cannot be reached between the exceedance NSR owner and Idaho Power, that Idaho Power submit, among other items, any measures Idaho Power proposes to address the exceedance.	Recommended Noise Control Condition 2: ... d. i. The certificate holder will work with the NSR property owner to develop a mutually agreed upon mitigation plan to include agreed upon measures that would be implemented at the NSR location to minimize or mitigate the ambient antidegradation standard noise exceedance. If the certificate holder executes an agreement with the NSR property owner, the certificate holder will submit a signed acknowledgement from the property owner to the Department for its records. If the certificate holder cannot reach an agreement with the NSR property owner, the certificate holder will submit to the Department <u>(1) the certificate holder's proposed measures, if any, to avoid, minimize, or mitigate the ambient antidegradation standard noise exceedances at the relevant NSRs; (2) a list of the dates that the certificate holder communicated with, or attempted to communicate with, the NSR property owners; and (3) the names, addresses, and phone numbers of the NSR owners.</u>
Page 557	Clarify to be more consistent with relevant rule findings	The Department recommends that the Council consider <u>conclude</u> that because the proposed facility is not located within residential use zoned land and there is no indication that any of these land use areas will be changed to residential

**Boardman to Hemingway Transmission Line Project
 Idaho Power's Comments on the Draft Proposed Order**

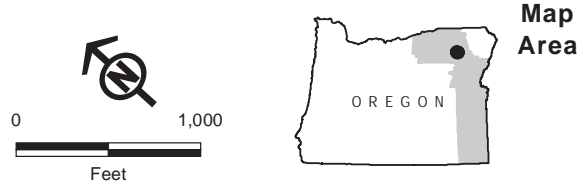
		zoning in the future, that this factor not be considered relevant to the request for exception there is a diminished likelihood of impacting additional NSRs in the future.
Page 565	Clarify to be more consistent with relevant rule findings	Based on the foregoing findings and conclusions of law, and subject to compliance with the recommended site certificate conditions, the Department recommends that the Council find that an exception and or variance be granted for the proposed facility at 36 NSR locations and that the proposed facility, including the proposed and alternative routes, would otherwise comply with the Noise Control Regulations in OAR 340-035-0035(1)(b)(B).
Page 570	Typo	Recommended Removal-Fill Condition 1: The certificate holder shall: b. Prior to construction of a phase or segment of the facility, the Department must receive a Letter of Concurrence issued by the Oregon Department of State Lands referencing the applicable wetland delineation for the phase or segment of the facility comply with removal fill permit requirements in Removal-Fill Condition 6.
Page 573	Typo	Recommended Removal-Fill Condition 3: a. Prior to construction of a phase or segment of the facility, the certificate holder shall submit an updated final Compensatory Wetland and Non-Wetland Mitigation Plan (CWNWMP), consistent with the draft CWNWMP (Attachment J-1 to the Final Order on the ASC), for review and approval by the Department, in consultation with Department of State Lands (DSL).
Page 577	Consider whether this paragraph addresses subsection (d), rather than (c), and therefore should be re-organized under (d)	Furthermore, the applicant describes in detail in ASC Exhibit B (and its attachments) the routing and siting process it conducted and results of the federal permitting process which contributed to the proposed and alternative routes the applicant includes in the ASC. This is summarized in Section III.A., Transmission Corridor Selection of this order, which describes the siting studies and process the applicant

**Boardman to Hemingway Transmission Line Project
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		<p>employed to establish the transmission corridors (proposed and alternative routes) for the proposed facility. This effort was conducted for the federal NEPA review process and for the ASC and included planning for avoidance and minimization of impacts to numerous resources including but not limited to waters of the state, visual resources, and NHPA Section 106 resources. Other siting constraints included ODFW Category 1 habitat, Greater sage grouse habitat, agricultural and farming lands, protected areas, mountainous areas with steep slopes, and highly populated residential areas. These siting constraints are also discussed in Section IV.Q.1., Noise Control Regulations, which also provides the siting constraints and considerations around noise sensitive properties, such as residences, within the analysis area. The proposed and alternative transmission line routes included in the ASC were selected to avoid or reduce impacts to these resources. Based upon a review of the assessments in the applicable sections of this order and on the information the applicant provided in ASC Exhibits, the Department recommends Council conclude the availability of alternatives to the project for which the fill or removal is proposed was considered.</p>
Page 577	Typo	<p>The availability of alternative sites for the permanent removal or fill activities relates to the section directly above that provides a description of the siting process the applicant used to establish the proposed and alternative routes, which employed the siting opportunities and siting constrictions <u>constraints</u> that informed or directed the routes.</p>
Pages 579-580	Typo	<p>As outlined in that section and relying upon information provided in the ASC, the Department provides a discussion of the applicant's experience and expertise permitting, constructing, operating, and maintaining facilitates <u>facilities</u> similar to the proposed facility, as well as the applicant's</p>

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		experience in compliance with state and federal safety and reliability standards for similar facilities.
Page 581	Typo	Section IV.E.2., Directly Applicable State Statutes and Administrative Rules and in Section IV.E.1., Local Applicable Substantive Criteria, for each affected county there is a discussion of ORS 215.283, ORS 215.275 and ORS 215. 296 <u>275(5)</u> , as they apply to the facility according to the zoning designation crossed.
General Comment	While Idaho Power does not propose that this be included in the Proposed Order, Idaho Power would like to acknowledge on the record that Idaho Power and Windy River, LLC have entered into an outside agreement which provides for certain conditions related to the location of the project on, and Idaho Power's use of, the Windy River property.	No edit proposed.



- | | | | |
|-------------------------|-------------------------|---|--------------------|
| Project Features | | Important Siting Constraints and Other Features | |
| Site Boundary | Transmission Centerline | New Road, Primitive | 100-foot Contours |
| Mileposts | | Distribution Line to Communication Station (IPC Service Territory Only) | Pipeline |
| Mile | Tenth-mile | Other Road | Stream |
| Work Areas | | Communication Station | Land Status |
| Pulling and Tensioning | Structure Work Area | New Road, Bladed | Private |
| Access | | | |
| New Road, Bladed | | | |

Boardman to Hemingway Transmission Line Project
 Application for Site Certificate



**Attachment C-3
 Alternative Location Maps**

Morgan Lake Alternative
 Union County

Source(s): BLM, IPC, ODFW, ODOT, NPS, USDA, USFS, USGS, Ventyx, Esri, DigitalGlobe, GeoEys, Earthstar Geographics, CNES/Airbus DS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo
 Z:\Util\Serv\Boardman_Hemingway\Reports\002_Oregon_Energy_Siting_Council\03_Final ASC\Exhibits\IC_Project Location\Maps\Attachment C-3\Morgan Lake_UNION_rev 20180612.mxd



Viewpoint Location Map

Source: ESRI

Legend

- | | |
|--|---|
| <ul style="list-style-type: none"> Key Observation Point Towers Transmission Line Railroad Interstates Highways State Routes | <p>Land Status</p> <ul style="list-style-type: none"> Bureau of Land Management National Park Service State State Wildlife, Parks and Recreation, or Other USFS Other Federal Land |
|--|---|

Photograph Information

Time of photograph: 12:58 PM
 Date of photograph: 10-26-17
 Weather condition: Clear
 Viewing direction: South
 Latitude: 45°18'7.15"N
 Longitude: 118° 8'19.95"W
 Nearest Tower Distance: 0.37 Mile

Photograph is intended to be viewed 12 inches from viewer's eyes when printed on 11x17 paper. The photograph below has been cropped top and bottom to show a wide angle of view with the above photograph's area shown in yellow.



Morgan Lake Alternative
 Morgan Lake Park
 H-Frame and Lattice Structures

Boardman to Hemingway
 Transmission Project

August 2019

Figure XX



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

Mark
Stokes

Name (mandatory) IDAHO POWER CO.

Mailing Address (mandatory) 1221 W. IDAHO ST., BOISE, ID 83702

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

Today's Date: 6/18/2019

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

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1 SECRETARY CORNETT: So we have one more
2 comment card, it's from Idaho Power Company. My
3 understanding is only if the Council members have
4 questions for them; is that correct? So if Council
5 members have any questions based on the testimony that
6 they've heard from others, if they'd like to follow up
7 with any questions with Idaho Power Company, they are
8 available to answer your questions.
9 VICE CHAIRMAN JENKINS: So I'd like Idaho
10 Power to talk about the tower placement between milepost
11 255 and 258, if they could, please.
12 SECRETARY CORNETT: So we can also take a
13 short break if Council and presiding officer is
14 interested to give Idaho Power a little bit of time to
15 think about responding or you could respond now if you'd
16 like.
17 MR. MARK STOKES: If we could have a few
18 minutes to at least look at the map.
19 HEARING OFFICER WEBSTER: Is Council good with
20 taking a ten-minute break and reconvening?
21 VICE CHAIRMAN JENKINS: Sure.
22 HEARING OFFICER WEBSTER: It's 6:05 now.
23 Let's reconvene at 6:15 to hear from Idaho Power.
24 (Recess taken.)
25 HEARING OFFICER WEBSTER: We will go back on

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1 the record here.
2 Just a couple of housekeeping things. First
3 of all, we have another member of the public who I
4 strong-armed into giving comment. So Mr. Bowman, if you
5 would like to come up, and then we will hear from
6 Mr. Stokes with Idaho Power. And when we're done with
7 that, just to give everybody, some late stragglers if
8 they have come in, the opportunity, we, the people from
9 the Department and me and probably the people from Idaho
10 Power, will be here until 8:00. So if there's somebody
11 that does come in late that still wants to give comment.
12 But after we hear from these two gentlemen here, we will
13 go I think probably back on break and then we will
14 reconvene again if somebody else comes in and wants to
15 give a comment.
16 So, Mr. Bowman, if you would state your name
17 and your address.
18 MR. JERRY BOWMAN: My name is Jerry Bowman. I
19 live at 2197 Rock Springs Canyon Road. I'm adjacent
20 property owner to Jim Foss.
21 That power line is going to be coming within
22 feet of my property. I'm concerned about the noise
23 level, I'm concerned about the electromotive force. We
24 have several nests of red-tailed hawks within a quarter
25 of a mile of where the transmission line is going to be.

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1 We have a continuous nest of bald eagle that is in the
2 same vicinity, within a quarter of a mile.
3 And I think that there was a proposed area for
4 the transmission line which was a little ways south of
5 where we are. A couple of miles on up the canyon
6 there's already a transmission line crossing. Why can't
7 they put the proposed transmission line adjacent to that
8 one? It's already designated for that type of system.
9 That's all I have. Thank you.
10 HEARING OFFICER WEBSTER: Thank you.
11 Mr. Stokes; correct?
12 MR. MARK STOKES: Yes.
13 HEARING OFFICER WEBSTER: If you would state
14 your name and your I guess work address and we'll go
15 from there.
16 MR. MARK STOKES: Mark Stokes. I'm an
17 engineering project leader for Idaho Power, address 1221
18 West Idaho Street, Boise, Idaho 83702.
19 And I guess to start off, I'd like to welcome
20 all of the Council members here. I appreciate you
21 traveling over here this week and next week as well.
22 We'll all be seeing a lot of each other both weeks.
23 To address the specific question that was
24 brought up, Councilman Jenkins, would you want to
25 restate your question.

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1 VICE CHAIRMAN JENKINS: Sure.
2 So my question goes back to Jay Chamberlin's
3 comment about the tower placement between milepost 255
4 and 258. There was concern -- I'll just leave it at
5 that.
6 MR. MARK STOKES: Okay. After looking at our
7 map set through that area, a lot of the folks that have
8 commented this evening are in that same area, and I was
9 able to confirm that our original land was to route
10 south of that area. The reason that route is not in the
11 project right now is because BLM had determined due to
12 the scenic and natural area south of these parcels and
13 the proximity to the Owyhee River and the siphon and
14 that whole area, BLM was not willing to leave the route
15 south of these parcels. So that's really, the route got
16 changed in the whole NEPA process and was moved to where
17 it is now. That was part of the agency-preferred route
18 for BLM. So in a nutshell that's my response to that
19 question.
20 I've got a copy of this map if any of you
21 would like to look at more specific details there. But
22 that is the background of that area.
23 Now, a little more specifically, I wanted to
24 comment, Mr. Proesch contacted our office just yesterday
25 morning, that was the first time we had had any



Oregon Department of Energy and the Energy Facility Siting Council

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Public Written or Oral Testimony Registration

Name (mandatory) IDAHO POWER CO. - MARK STOKES

Mailing Address (mandatory) 1221 W. IDAHO ST, BOISE, ID 83702

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

Today's Date: 6/19/19

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

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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
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Written Testimony

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1 that people have talked about, the federal corridor, the
2 central Oregon road, go to the federal corridor. Why
3 don't you go that way, that's what Baker County has been
4 saying from the beginning. Idaho Power, No, that's a
5 hundred miles out of the way. That will cost too much.
6 Burying the line. Oh, can't bury the line, it
7 might cost as much as Chino Hills that went under an
8 interstate and shopping mall and a whole -- I mean,
9 okay, that's what they wanted to use.
10 Substations, dropping off some pops along the
11 way, some substations, the cost of that. All these
12 costs, why are they saying it's too expensive or we
13 can't do it? I'll tell you why. Because that changes
14 the cost of the B2H portfolio.
15 In the 2019 round, there were 24 portfolios to
16 beat Idaho Power's need. We won't even get into all
17 that stuff yet, we'll maybe talk about that tomorrow in
18 La Grande. But to meet their need now, this go-round in
19 2019, we listened to and they created in their computer
20 modeling 24 portfolios; 12 with B2H, 12 without B2H.
21 B2H portfolio is the cheapest portfolio.
22 If you added one of those things, the federal
23 corridor, the burying the line or some substations, B2H
24 is no longer the least-cost portfolio in Idaho Power's
25 toolbox.

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1 So we're not going to go away. We'll take
2 this to the PUCs in both states. We keep on, we keep
3 going. You'll hear more tomorrow, and all of our stuff
4 will be in writing of course by the deadline.
5 Thank you.
6 HEARING OFFICER WEBSTER: Thank you.
7 Is there a last call for anybody to give
8 comment before we have Mr. Stokes up? Is there anybody
9 on the phone that's listening in that would like to give
10 comment? Okay. Hearing none, we'll hear from
11 Mr. Stokes.
12 MR. MARK STOKES: Good evening. My name is
13 Mark Stokes. Address is 1221 West Idaho Street, Boise,
14 Idaho 83702. I'm an engineering project leader for
15 Idaho Power, and the project leader for the Boardman to
16 Hemingway project.
17 Here tonight, I was not going to make any
18 specific comments on everything that's been said this
19 evening but I did want to avail myself to answer any
20 questions that Council members may have.
21 HEARING OFFICER WEBSTER: Any questions,
22 Council, for Mr. Stokes?
23 CHAIRMAN BEYELER: No.
24 VICE CHAIRMAN JENKINS: I do have a question
25 for Mark.

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1 Mark, one of the issues that has been raised
2 is invasive weed spread and whether or not Idaho Power
3 is going to be submitting an invasive weed management
4 plan. I believe that was referred to in the
5 application. Can you talk a little bit about that.
6 MR. MARK STOKES: Yes, certainly, Vice
7 Chairman.
8 There's a lot of plans like the noxious weed
9 plan that were, we call them frameworks at this point,
10 that were developed as a part of the NEPA process,
11 working through that with BLM. And the intent all along
12 has been that when we get to the point where we have
13 more certainty on the route and other things associated
14 with the line, that we would then go back and flesh out
15 those plans, put all the details in. And it would be at
16 that point that we would expect to work through each of
17 the counties to make sure that the specific plans met
18 their needs.
19 So it's certainly in our plan to go out and do
20 that. And that will all happen here roughly a year and
21 a half, 2 years when we develop what's called the
22 construction POD, or plan of development, which is a
23 pretty sizable document that will include all of those
24 other plans. There will be things in there that address
25 section 106, cultural issues, fire prevention and

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1 protection plans. There's a lot of them. We can go
2 back and look at the list if we need to. But we
3 certainly do plan on addressing those.
4 VICE CHAIRMAN JENKINS: Thank you.
5 HEARING OFFICER WEBSTER: Any other questions?
6 Thank you.
7 What is going to happen on our end now is we,
8 those of us, the Council members and the DOE people and
9 me, we will be here until 8:00 or close to 8:00 in case
10 there's anybody that comes in that wants to provide
11 public testimony. But for now, it's 6:38 and we'll
12 recess and we will reconvene if somebody does join us
13 and want to give testimony.
14 So thank you everybody.
15 (Hearing recessed at 6:38 p.m.)
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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) IDAHO POWER Co. - MARK STOKES

Mailing Address (mandatory) 1221 W. IDAHO ST., BOISE, ID 83702

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 AT END/IF NEEDED

Written comments can also be submitted today.

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

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

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

Written Testimony

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

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1 day. I have seen things like, I saw a newborn elk
2 nursing off its mom on the hillside outside of my house.
3 I could live my whole life someplace in a city and not
4 have those experiences.
5 So I really want to see this power line not
6 come through here because, one, I think it will partly
7 ruin things most certainly. I care more about kids than
8 anything, and it will certainly make our major outdoor
9 park that's wild inaccessible to them during the summer
10 when they are able to go there. And I don't know how
11 many summers that road to Morgan Lake will be really
12 difficult to use. It is a difficult road. If you
13 haven't experienced it, you should.
14 One of the teachers I taught with one time was
15 coming down in the summer, and his wheel caught, it gets
16 really muddy even this far from the edge. And his wheel
17 caught in that mud and got stuck and he rolled down into
18 that valley down there. And he moved his house, he
19 moved his family, he had kids, and he decided that road
20 was too dangerous for his family to be up there in the
21 wintertime. So it's not a good road, and I'm concerned
22 about the damage that will be done to it.
23 The other thing is that I am one of those that
24 believes that the technology is such that there are
25 other ways to meet this demand that is proposed,

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1 perceived in Idaho. And I do believe that Idaho Power
2 is doing the best job that they can do, as being
3 financially responsible for their ratepayers and their
4 shareholders. They are looking for the cheapest way to
5 do this.
6 But there is all kinds of wealth, and one of
7 the kinds of wealth we have is a world that is viable.
8 A world that's not too hot and not too cold. And the
9 alternative energy, things we have, like solar and
10 water, are so perfect for the area that they want to
11 serve, but it does cost more. So in order for it to not
12 cost more, they are going this route.
13 But I would like all of us to look a little
14 larger. I have all the kids I taught who are now having
15 children of their own. The kids I first taught, when I
16 first came here, some of them are grandparents now. I
17 came here because I care about connections. I care
18 about people and I care about animals and I care about
19 connections, and I want the human race to go on for a
20 while.
21 And I think that doing everything we can to
22 make that happen is incumbent upon all of us, even
23 though we have different ideas of what that might be.
24 I am hoping that as a government agency -- you
25 know, world edification under Franklin Roosevelt's

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1 program where it was federally instituted, brought us
2 great wealth. And I believe that we can keep some of
3 that wealth. But we can't keep going to provide
4 electricity in the ways that we have, because -- I mean,
5 the water is renewable from the dams. But the coal
6 production and so forth, no, we have got to have other
7 ways, or my grandchildren and your grandchildren, they
8 are not going to have the kind of world we have.
9 And you people are government employees, and
10 because people have so many different ideas about who
11 should cut what and this is what I can do so that you
12 can do -- oh, you're traveling around the world. Well,
13 that's a lot of carbon footprints. So we all have these
14 different things.
15 So it's time for government, for you guys to
16 stand up and say, Is this really a good idea? Not just
17 for this community, but is it really necessary to do
18 this kind of power, to cause this kind of fire danger?
19 I know I'm kind of rambling here, and I didn't
20 have much time to prepare anything. But I was down in
21 Santa Rosa after the fire, I think it was 2015, I was
22 down there in January, and I saw -- my friend lived very
23 close to the devastated area in the town of Santa Rosa.
24 And I camped in Napa Valley and came over through Rincon
25 Valley, which was burned up.

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1 I used to think when I looked on the news and
2 I saw that one house there and everything else that was
3 burned around it, and I looked at that one house and
4 thought, boy, were those people lucky. But when I got
5 to Sonoma County, and I saw that, and I saw the one
6 house remaining, and there is just charred foundations
7 everywhere, and chimneys, that's all that was there, and
8 I saw that one house that was standing, and I realized
9 they are not lucky. Everybody they were connected to is
10 gone. Most of their neighbors have a sign up to try to
11 sell their property. But who wants to buy it?
12 So we have to take care of the future. We
13 have to mitigate fire danger. And this place here is
14 too dry to take on any more risk. Please help us out
15 here.
16 Thank you.
17 HEARING OFFICER WEBSTER: Thank you.
18 Mr. Stokes.
19 MR. MARK STOKES: Good evening, everybody.
20 It's getting late. Chair Beyeler, Vice Chair Jenkins,
21 City Council member, staff, good evening. My name is
22 Mark Stokes. I'm an engineering project leader for
23 Idaho Power Company. My address is 1221 West Idaho
24 Street, Boise, Idaho 83702.
25 MR. DAVE STANISH: I'm Dave Stanish, also with

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1 Idaho Power, same address. So hopefully together we can
2 help answer your questions.
3 MR. MARK STOKES: After listening to all of
4 the comments tonight, we thought there were just a
5 couple of things that we wanted to get corrected on the
6 record.
7 First off, some previous testimony that was
8 presented tonight a statement was made that BPA is not a
9 partner in the project any longer. That is not true.
10 They are still a fully committed partner. In fact, I
11 was in communication with my counterparts at BPA earlier
12 this week before I left town. So I just want to get
13 that on the record.
14 One other item here, a few speakers ago made
15 the statement that Idaho Power does not have any
16 customers in Oregon. And that is not true as well. We
17 serve approximately 15 percent of our total system load
18 is for Oregon customers that are located in Malheur and
19 Baker Counties. So we do have a fairly substantial
20 number of customers in Oregon.
21 So with that, as we have done previous nights,
22 David and I would like to make ourselves available to
23 try and field any questions that Council members may
24 have.
25 VICE CHAIRMAN JENKINS: So Mark and David, I'm

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1 going to ask a really hard question tonight: Why wasn't
2 the BLM route proposed as a part of your application to
3 EFSC?
4 MR. MARK STOKES: Back when BLM was working on
5 getting their ROD issue, the delays in their process
6 happened, occurred. We had to move ahead with the state
7 process late in the application. And by the time BLM
8 came out with their ROD, their record of decision, it
9 was too late for us to really go back at that point.
10 Now, when I had conversations with BLM's
11 program manager about this and whether that created any
12 issues for BLM, they recognized that the Glass Hill
13 route that you're talking about and the Morgan Lake
14 route were identical on parcels that were under control
15 of BLM, federal government.
16 So the fact that in our state application we
17 had the Morgan Lake route did not influence or impact
18 BLM's record of decision in their process.
19 VICE CHAIRMAN JENKINS: Thank you.
20 HEARING OFFICER WEBSTER: Any further
21 questions?
22 CHAIRMAN BEYELER: Not from me tonight.
23 HEARING OFFICER WEBSTER: Thank you,
24 gentlemen.
25 MR. MARK STOKES: Thank you very much.

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1 HEARING OFFICER WEBSTER: Last call for
2 anybody to give any statements?
3 MR. RANDY SILTANEN: Thank you for letting me
4 speak. My name is Randy Siltanen. My address is 1901
5 Foley Street.
6 So I guess my major question to Idaho Power
7 is: For what just cause? So why are we doing this? If
8 there were no other options it would be understandable,
9 but there are plenty of other options. And we have
10 heard tonight dozens of reasons why this is a bad idea,
11 and we haven't heard any reason why this is a good idea.
12 And what it comes down to, to me, I think, is
13 money. And they think that it will be cheaper in the
14 long run to do this rather than use other new
15 technologies.
16 And Mr. Cimon spoke very eloquently about
17 this, that it's yesterday's news. We have got new
18 options. We have solar and we have wind. And there is
19 a very smart engineer by the name of Mark Jacobson at
20 Stanford who has outlined a really good road map for
21 renewable energy by the year 2030. And it doesn't
22 really make any sense to do this if money is the only
23 reason.
24 I think that's what it is, and I think they
25 are wrong on that. At this point they think it's

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1 cheaper, but as Mr. Cimon outlined, it's not. In the
2 long run, it's not cheaper. And there is no just cause
3 to do this. It's not like there is -- it's not like we
4 are trying to provide water to an impoverished area.
5 It's not like bringing electricity to a third-world
6 country who needs it to run their hospital.
7 There is plenty of electricity, there is
8 plenty of ways to get it, and it's not absolutely
9 essential that it goes that way. And yet you are asking
10 people to give up their viewshed. You are putting
11 people's lives at risk for something that is not
12 necessary, other than that it's cheaper, and it seems
13 cheaper, and in the long run it's not cheaper. And that
14 is all I have to say.
15 Thank you.
16 HEARING OFFICER WEBSTER: Thank you.
17 We have run an hour past our allotted time.
18 So anybody -- do you want 2 more minutes, Ms. Barry?
19 MS. LOIS BARRY: This will be very short. But
20 since you have all been so patient and listened for so
21 long and you have heard a lot of important information,
22 one is, from my research, that every single planned
23 transmission line that has been canceled was considered
24 essential until the day it was canceled.
25 But now I think you deserve a laugh. I want



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Name (mandatory) MARK STOKES - IDAHO POWER CO.

Mailing Address (mandatory) 1221 W. IDAHO STREET, BOISE, IDAHO

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

Today's Date: 6/26/19

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

Input on Draft Proposed Order for the Boardman to
Hemingway Transmission Line

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

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1 MR. MARK STOKES: Chairman Beyeler, Vice Chair
2 Jenkins, other Council members, good evening. My name
3 is Mark Stokes, and I'm an engineering project leader
4 with Idaho Power Company. My address is 121 West Idaho
5 Street, Boise, Idaho 83702.
6 HEARING OFFICER WEBSTER: Thank you.
7 Mr. Jenkins.
8 VICE CHAIRMAN JENKINS: Mr. Stokes, my
9 question relates to forest lands and several of the
10 comments that have been made this evening and previous
11 evenings about impacts to forest lands. The draft
12 proposed order and your application talk about
13 right-of-way widths, and you are analyzing 500 feet, and
14 in some forested areas you'll be as wide as 300 feet,
15 which would be de-timbered for that area.
16 And there is some question about whether or
17 not you need to go through some kind of review process
18 at a State level in order to do that. And I wanted to
19 give you an opportunity to talk about crossing forest
20 lands with a high-voltage power line.
21 MR. MARK STOKES: Okay. Vice Chair Jenkins,
22 I assume we are talking about private land that is
23 forested as well as US Forest Service Land?
24 VICE CHAIRMAN JENKINS: That's correct.
25 MR. MARK STOKES: Yeah, there is approximately

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1 7 miles of US Forest Service land that the project
2 crosses. We would and have been working with the Forest
3 Service on getting a Record of Decision from them, and
4 they will dictate how we handle things on the Forest
5 Service property.
6 Specific to the private property, the
7 discussion that you heard tonight, as far as the need
8 for a slightly wider right-of-way width, that is not
9 going to be the entire length through forested land.
10 That's going to be highly dependent on the topography of
11 any particular area and the identification of what we
12 would call "problem trees" that are tall enough that if
13 they were to fall over, they could potentially impact
14 the line. So it will be those areas that are
15 specifically targeted where we would have to go with a
16 little bit wider right-of-way, as far as the vegetation
17 management plan and clearing we would do.
18 Outside of that, on the private land,
19 obviously, as we go through and negotiate with
20 landowners for the right-of-way acquisition, the forest,
21 the timber value will be factored into all of that.
22 Did that address all of your question?
23 VICE CHAIRMAN JENKINS. Yeah.
24 So, Mark, one of the questions that has come
25 up I believe a couple of times in the testimony that we

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1 have heard is the conversion of these forest lands under
2 the power line to some other use, such as livestock
3 grazing. Are you aware of Idaho Power going through a
4 separate process in order to do that?
5 MR. MARK STOKES: That is a question I would
6 have to ask David to respond to, if he recalls what our
7 intent was there.
8 Are you on the line, David?
9 MR. DAVID STANISH: I am.
10 MR. MARK STOKES: Did you hear Vice Chair's
11 question?
12 MR. DAVID STANISH: I think what I heard was
13 you were wondering if --
14 MR. MARKS STOKES: David, hold on a second.
15 They are having a hard time hearing you.
16 HEARING OFFICER WEBSTER: Mr. Stanish, this is
17 Presiding Hearing Officer Webster. We need to ask you
18 to, I think, speak up a little bit. Because you are
19 coming through the phone, it's not clear and the court
20 reporter does want to take down everything you are
21 saying and get it accurate. So if you could speak up
22 and slow down a little bit, that would be great.
23 Do you want to repeat the question,
24 Mr. Stokes?
25 MR. MARK STOKES: Yes.

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1 David -- and correct me if I get any of this
2 wrong, Council Member. I think the question is on areas
3 that are designated as forestland at this point, is it
4 our intent to try to get those areas recategorized into
5 something under more of an agricultural use designation?
6 MR. DAVID STANISH: Okay. I understand.
7 This is David Stanish from Idaho Power.
8 The answer is no, we will not be seeking to
9 rezone forestland areas that are utilized for the
10 right-of-way. The zoning designation is reserved for
11 the property owner. It's up to them how they want to,
12 whether they would like to pursue a change in the
13 building designation or not.
14 I also heard a question of whether we were
15 going to go through a different process to authorize the
16 right-of-way through forestland, I believe. And the
17 answer to that is also no. In Exhibit K, we go to great
18 lengths to discuss compliance with the Forest Practices
19 Act and our choice of right-of-way --
20 HEARING OFFICER WEBSTER: Mr. Stokes, hold on.
21 So we are having a little bit of -- can you
22 hear me okay, Mr. Stanish? Can you hear me okay? We
23 were having some trouble hearing you.
24 For now let's try this: Mr. Stokes, were you
25 able to hear Mr. Stanish's response?

**Input on Draft Proposed Order for the Boardman to
Hemingway Transmission Line**

Page 58	<p>1 MR. MARK STOKES: Well, it was basically I 2 think "no" on both counts, that our intent was not to 3 try to rezone any of those designated areas, in a 4 nutshell is what I heard from him. 5 We can certainly follow up with more detail on 6 that in our written comments as well. 7 VICE CHAIRMAN JENKINS: Thank you. 8 HEARING OFFICER WEBSTER: I believe that the 9 first answer was no, it will be up to the property owner 10 to seek rezoning? Was that what you heard him say? 11 MR. MARK STOKES: He indicated that we would 12 leave any rezoning up to the property owners' desires, 13 that we would not be asking for or pushing for that. 14 HEARING OFFICER WEBSTER: And then the second 15 no, they were not aware of any separate process -- 16 MR. MARK STOKES: Yeah. No separate process 17 that we intend to work through. 18 HEARING OFFICER WEBSTER: Okay. 19 COUNCILLOR ROPPE: I have a question for Mark 20 Stokes. 21 On the last lady who spoke to us who said that 22 she had purchased her land in March of 2019 and she had 23 no contact with Idaho Power at all, and so she knew 24 nothing about the fact that you were going to be 25 putting, I think she said five towers on her land.</p>	Page 60	<p>1 had been in contact with them. 2 MR. MARK STOKES: Yes. 3 HEARING OFFICER WEBSTER: Any other questions 4 for Mr. Stokes? 5 Anything you want to add? 6 MR. MARK STOKES: I have no further comments 7 for tonight. 8 HEARING OFFICER WEBSTER: Okay. So I guess, 9 Council, you have a request coming before you to extend 10 the comment period. What are your thoughts on that? 11 I'll start. Chair Beyeler? 12 VICE CHAIRMAN JENKINS: This is Hanley. 13 We are required to give 30 days notice; we 14 gave 60. But I think it's reasonable to extend the 15 hearing period for additional written testimony. The 16 request was for 30 days; I think that's reasonable. And 17 so I would make that as a motion that we extend the 18 written portion from July 23rd to August 22nd. July has 19 31 days. And so that would be then the final date for 20 submitting written testimony. That is a formal motion. 21 COUNCILLOR ROPPE: I'll second that motion. 22 CHAIRMAN BEYELER: A motion has been made and 23 seconded. Any further discussion? 24 SECRETARY CORNETT: Mr. Chair, just for 25 clarification, August 22nd at 5 p.m.</p>
Page 59	<p>1 Would you have had contact with the previous 2 owners and, if so, would that not have been their 3 responsibility to inform a buyer of that? 4 MR. MARK STOKES: It certainly -- my thoughts 5 and expectations that the previous owner should have 6 said something. In fact, we ran into a similar 7 situation on Tuesday night of last week, there was a 8 gentleman who just a little bit less than a year ago 9 purchased a piece property in Malheur County, and 10 neither the title company nor the previous owner 11 mentioned anything about the project to him. 12 Now, certainly we would have reached out to 13 the previous owner and tried to make contact, and we've 14 been doing that for well over 10 years now. And 15 unfortunately this -- we try to keep everything up to 16 date, but we are talking, I think it's roughly 700 17 landowners that we are trying to manage along that 18 300 miles. So it's pretty substantial. 19 Now that we are aware of this, we'll certainly 20 reach out and see what kind of issues there are and what 21 we can do. 22 COUNCILLOR ROPPE: I think your reaching out 23 would be very good. No. 1, you need to do that. But 24 No. 2, I think that that party needs to address the 25 previous owner as to why they did not disclose that you</p>	Page 61	<p>1 UNIDENTIFIED SPEAKER: Is that Pacific? 2 SECRETARY CORNETT: Pacific Time. 3 HEARING OFFICER WEBSTER: Specifically Pacific 4 Time. 5 CHAIRMAN BEYELER: Okay. Mr. Secretary, call 6 roll call for vote. 7 SECRETARY CORNETT: Kent Howe? 8 COUNCILLOR HOWE: Yes. 9 SECRETARY CORNETT: Betty Roppe? 10 COUNCILLOR ROPPE: Yes. 11 SECRETARY CORNETT: Hanley Jenkins? 12 VICE CHAIRMAN JENKINS: Yes. 13 SECRETARY CORNETT: Mary Winters? 14 COUNCILLOR WINTERS: Yes. 15 SECRETARY CORNETT: And Barry Beyeler. 16 CHAIRMAN BEYELER: Aye. 17 SECRETARY CORNETT: Motion carries. 18 HEARING OFFICER WEBSTER: So it's official 19 that we have extended the comment period, the public 20 comment period for written testimony to August 22, 21 5 p.m. Pacific Time. 22 Does anybody happen to know what day of the 23 week that is? 24 MR. PATRICK ROWE: Thursday. 25 HEARING OFFICER WEBSTER: Thursday,</p>

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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

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



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) MARK STOKES - IDAHO POWER CO.

Mailing Address (mandatory) 1221 W. IDAHO ST., BOISE, ID 83702

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

Today's Date: 6/27/19

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

Written comments can also be submitted today.

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

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

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

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

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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

<p style="text-align: right;">Page 94</p> <p>1 anticipate this IRP getting acknowledged until roughly 2 May of 2020. But we will have the document out there 3 and available for anybody to look at. And just for your 4 information, Boardman to Hemingway is still showing to 5 be the lowest cost, least risk resource for meeting 6 future load growth for Idaho Power's customers. 7 The last piece I really wanted to mention is, 8 it's been talked about tonight, I am sure you all 9 remember last night, the Council voted to grant a 30-day 10 extension on the public comment period. And I think 11 when I got up last night, you probably expected me maybe 12 not be in support of that. And I generally wasn't, I'll 13 be honest with you. But I did not want to speak out 14 against that last night, knowing that I was going to 15 come here and ask the Council if you would be willing to 16 grant two things basically is what I would like to ask 17 for. 18 One is that Idaho Power be given an 19 opportunity of an additional 30 days past what is now 20 the August 22nd date to be able to respond to any 21 comments that are filed at the very last minute. We 22 expect there will be quite a few comments that come in 23 right at that 5 p.m. deadline on the 22nd. So we would 24 like to have the opportunity to respond to those if we 25 could.</p>	<p style="text-align: right;">Page 96</p> <p>1 alternative routes that are proposed through Morrow 2 County going along the property owned by the Navy. 3 There is a proposed route and then there is two 4 alternatives. Can you talk a little bit about those? 5 Kellen has tried to pull up -- I think tried to pull up 6 a map for us. 7 I have the information here that is in the DPO 8 that talks about where the proposed route is and where 9 the two alternatives are, but it may be best if we heard 10 from you. 11 MR. MARK STOKES: Okay. The proposed route 12 that we started out with initially basically heads south 13 out of the Longhorn substation, and it stays on the west 14 side of Bombing Range Road all the way down that piece 15 of the bombing range. 16 The reason we proposed that was because in the 17 process of working with the landowners who had the 18 agricultural property on the other side of the road, we 19 were trying to avoid impacts to them. And as we 20 continued to work through the process, in working with 21 the Navy, there were two resource areas that were 22 identified that were on the Bombing Range property that 23 were on the west side of Bombing Range Road. And I 24 believe the further north one was the RNA and the 25 southern one was the RMA. And so this whole process is</p>
<p style="text-align: right;">Page 95</p> <p>1 The second part of my request would be that 2 the Council consider taking a vote tonight to not grant 3 anymore further extensions. As we work our way through 4 this process, there have been a lot of deadlines set and 5 very few of them actually met. And I understand that 6 because it's a big public process. 7 But from our standpoint, we are trying to go 8 through this project and the whole permitting that we 9 need to do, and we some need certainty on how we can 10 move forward with this, if we can ultimately get a site 11 certificate, which is what we are trying to do. But 12 again, continued delays just create issues for us. So I 13 would ask the Council to consider that also, if you 14 would, please. 15 And with that, I think I'm just going to turn 16 it over. I know there are probably quite a few 17 questions tonight that Council members will have. And I 18 do have, I believe, David Stanish on the line to help 19 tonight. I think we have a better connection with him 20 tonight than we did last night. 21 HEARING OFFICER WEBSTER: Thank you, 22 Mr. Stokes. 23 Councillors, questions? 24 VICE CHAIRMAN JENKINS: So this is Hanley. 25 Mark, we haven't heard anything about the</p>	<p style="text-align: right;">Page 97</p> <p>1 what led to the two alternatives. 2 Alternative 1 goes down all the way -- or it 3 only goes down to the RNA and then crosses to the east 4 side of Bombing Range Road. So Alternative 1 avoids 5 both of those resource areas. 6 Alternative 2 goes down, still through that 7 RNA, the northern resource area, but then jumps across 8 on the east side prior to the southern resource area 9 there, the RMA. 10 And so because we felt like the Navy would not 11 let us go through either of those resource areas, we 12 have started to pursue Alternative 1. And what that 13 entails again is hopping across Bombing Range Road north 14 of the RNA, the northern resource area, and then heading 15 south along the east side of Bombing Range Road. And to 16 make that work out we have had to work with the property 17 owners on that side and the Umatilla Electric 18 Cooperative because they have got a line there that they 19 have to move to make this work. And we are also with 20 the landowners, we are working with them to move two 21 center pivots to create space for the towers for B2H. 22 CHAIRMAN BEYELER: Would that just be 23 shortening pivot circle irrigation spans? 24 MR. MARK STOKES: Chairman Beyeler, we are 25 actually moving the center pivots. We are not reducing</p>

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1 any irrigated acreage.
2 HEARING OFFICER WEBSTER: Other questions for
3 Mr. Stokes?
4 COUNCILLOR GRAVATT: I have one. Obviously, I
5 don't have a chance to look at the 2019 IRP, but what
6 actually is in the action plan for B2H?
7 MR. MARK STOKES: The action plan items itself
8 basically ask for acknowledgement of continued
9 construction activities for B2H. So basically there is
10 nothing really new in there that we are asking for.
11 HEARING OFFICER WEBSTER: Anything else?
12 Council?
13 COUNCILLOR GRAVATT: Two questions: One is --
14 this is not the only time we will get a chance to
15 address the applicant?
16 SECRETARY CORNETT: In terms of their
17 responses to comments and giving them sort of an insight
18 into what you would like to see them respond to, yes, it
19 really is.
20 COUNCILLOR GRAVATT. Then I have more than one
21 question.
22 Can you respond to the concerns about fire
23 that were shared this evening and what the applicant is
24 prepared to address to the property owners' concerns
25 about fire?

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1 MR. MARK STOKES: Yes. There have been a lot
2 of concerns expressed over fire. We have got the fire
3 prevention protection plan in our application at this
4 point. Our intent, and actually I believe we are
5 required to do this, is to continue to work through with
6 the counties those plans and make revisions so that we
7 meet all of the individual county standards. And then
8 ultimately I think that is what we have to do to get
9 through the BLM process as well. They'll ultimately get
10 a notice to proceed. So we recognize there is more work
11 to do there.
12 A lot of that though is based on -- there is
13 certain things associated with the project that we don't
14 know yet because there is places where the route is not
15 fixed and other issues out there still. But that is in
16 our plan to get those plans done, work with the counties
17 and get them approved.
18 COUNCILLOR GRAVATT: What is the expectation
19 on timing of knowing it?
20 MR. MARK STOKES: Well, that plan and other
21 plans would get finalized as a part of working on the
22 construction POD, which is a document that BLM kind of
23 governs us putting that together because there is a lot
24 of different agencies, including BLM, that provide input
25 into that. And that should be taking place in 2021 and

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1 and 2022 as well, and that work will be being done and
2 being finalized.
3 COUNCILLOR GRAVATT. I have one other
4 question. From the applicant's perspective, are your
5 negotiations with the landowners complete, from your
6 perspective? We have heard concerns about financial
7 compensation. Is that, from the applicant's
8 perspective, are those conversations done or are they
9 ongoing?
10 MR. MARK STOKES: Oh, no, no. In fact, we
11 have had numerous conversations with landowners. But
12 the formal right-of-way acquisition process has yet to
13 begin. In fact, it is on our plan to start that here in
14 2020.
15 HEARING OFFICER WEBSTER: Thank you,
16 Mr. Stokes.
17 And I want to sort of circle back to the
18 Council now to address Mr. Stokes' request -- or Idaho
19 Power's request, the applicant's request, for an
20 additional 30 days to respond after close of the comment
21 period on August 22nd.
22 VICE CHAIRMAN JENKINS: We granted 30 days to
23 the public to provide additional written testimony,
24 until August 22nd. I think it's only fair to provide
25 the applicant additional time to be able to respond to

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1 that. And I am open to suggestions if 30 days doesn't
2 seem to be appropriate. But I do believe there needs to
3 be additional time to respond.
4 COUNCILLOR ROPPE: Hanley, are you saying that
5 you don't believe 30 days is long enough or too long?
6 VICE CHAIRMAN JENKINS: I'm not committed to
7 30 days. Thirty days would be adequate, as far as I'm
8 concerned.
9 COUNCILLOR ROPPE: So are you going to make a
10 motion?
11 VICE CHAIRMAN JENKINS: Well, I thought the
12 Council could have a discussion about the 30 days, or
13 whatever you want.
14 COUNCILLOR ROPPE: I think 30 days is
15 appropriate.
16 CHAIRMAN BEYELER: As do I. I'm of the belief
17 there are going to be a mountain of things that come in
18 at the end of, on the 22nd of August.
19 COUNCILLOR GRAVATT: I'm okay with providing
20 the applicant with the additional time to respond.
21 COUNCILLOR HOWE: I think 30 days makes sense.
22 VICE CHAIRMAN JENKINS: Mr. Chair, I make a
23 motion. I move that we grant the applicant an
24 additional 30 days, whatever that comes out to, for
25 written rebuttal responses to testimony received up to

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1 and through August 22nd at 5 p.m.
2 HEARING OFFICER WEBSTER: That is a Sunday.
3 You said August. Do you mean September?
4 VICE CHAIRMAN JENKINS: An additional 30 days,
5 I didn't check what that date is.
6 COUNCILLOR ROPPE: I'll second that motion.
7 SECRETARY CORNETT: If I can just make one
8 minor adjustment to that. That is a Sunday. So
9 September 23rd is a Monday. So September 23rd at 5 p.m.
10 might be a more appropriate time, one extra day, but it
11 puts it on a weekday.
12 VICE CHAIRMAN JENKINS: I agree to that.
13 COUNCILLOR ROPPE: I agree with it also.
14 CHAIRMAN BEYELER: Mr. Secretary, please call
15 the roll.
16 SECRETARY CORNETT: Kent Howe?
17 COUNCILLOR HOWE: Yes.
18 SECRETARY CORNETT: Ann Gravatt?
19 COUNCILLOR GRAVATT: Yes.
20 SECRETARY CORNETT: Barry Beyeler?
21 CHAIRMAN BEYELER: Aye.
22 SECRETARY CORNETT: Mary Winters?
23 COUNCILLOR WINTERS: Yes.
24 SECRETARY CORNETT: Betty Roppe?
25 COUNCILLOR ROPPE: Yes.

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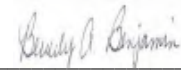
1 SECRETARY CORNETT: And Hanley Jenkins.
2 VICE CHAIRMAN JENKINS: Yes.
3 SECRETARY CORNETT: Motion carries, Mr. Chair.
4 VICE CHAIRMAN JENKINS: So as to the second
5 request, I'm not willing to make a commitment on any
6 further extensions. From my perspective, we just need
7 to see how this process evolves. I do find it ironic
8 that Idaho Power asked for 30 days and then it wants to
9 not allow any other extensions.
10 COUNCILLOR ROPPE: I agree with Hanley. I
11 don't see that we want to make a commitment to that
12 since we don't know what would come up before us. We
13 will have to handle that as they come.
14 COUNCILLOR WINTERS: Agreed.
15 CHAIRMAN BEYELER: I'm in concurrence.
16 COUNCILLOR HOWE: I agree.
17 HEARING OFFICER WEBSTER: So if I understand,
18 you are leaving it at this point that the plan is for
19 August 22nd for the public comment and September 23rd
20 the time for Idaho Power to respond to the public
21 comment. And you are not going to commit one way or the
22 other as to any other extensions, but wait and see how
23 things sort of shake out until August and September?
24 CHAIRMAN BEYELER: By the time the staff gets
25 all of the written comments, delivers them to Idaho

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1 Power, Idaho Power gets theirs back, staff is going to
2 have a ton of stuff to go through. So yeah, I think
3 that is why we are actually looking at this, we don't
4 want to drag this clear into December. So I just think
5 that getting another extension is going to be difficult
6 out of the Council.
7 SECRETARY CORNETT: No vote. There is not a
8 motion on the floor.
9 HEARING OFFICER WEBSTER: Okay. Thanks,
10 Council.
11 I'm just going to give one last chance for
12 anybody. We have about 10 minutes left. Does anybody
13 want to say anything or are we good to go? Is there
14 anybody on the phone that would like to give public
15 comment?
16 Okay. Hearing none. It is 7:51 p.m. on
17 June 27, 2019, and as the presiding officer I will go
18 ahead and close the public hearing in Morrow County and
19 end the then public in-person testimony. But we will
20 keep the time period open for the public to continue to
21 comment in written form through August 22nd, 2019, at
22 5 p.m. Pacific Time.
23 That is it for tonight, folks. We are done.
24 (Hearing concluded at 7:51 p.m.)
25

REPORTER'S CERTIFICATE

1 I, BEVERLY A. BENJAMIN, CSR No. 710, Certified
2 Shorthand Reporter, certify:
3 That the foregoing proceedings were taken before
4 me at the time and place therein set forth;
5 That the testimony and all objections made were
6 recorded stenographically by me and transcribed by me or
7 under my direction;
8 That the foregoing is a true and correct record
9 of all testimony given, to the best of my ability;
10 I further certify that I am not a relative or
11 employee of any attorney or party, nor am I financially
12 interested in the action.
13 IN WITNESS WHEREOF, I set my hand and seal this
14 10th day of July 2019.
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BEVERLY A. BENJAMIN, CSR 710
Notary Public
P.O. Box 2636
Boise, Idaho 83701-2636



1995 Third Street
Baker City, Oregon 97814

August 22, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E., Salem
Sent via e-mail to Kellen.Tardaewether@oregon.gov

RE: Baker County Comments on the Draft Proposed Order

Ms. Tardaewether and the Energy Facility Siting Council,

These comments on the Boardman to Hemingway Transmission Line Draft Proposed Order issued May 22, 2019 are submitted on behalf of the Baker County of Commissioners. Please accept these comments into the record for review by the Energy Facility Siting Council.

Baker County's position on the Boardman to Hemingway project remains the same; after reviewing the information submitted by the applicant and the Draft Proposed Order, Baker County continues to believe the project would not be appropriate or suitable in Baker County. The totality of the impact to our landowners, agricultural lands, resources, viewsheds, and tourism values has not been appropriately mitigated through the measures proposed. Furthermore, Baker County will not receive a direct benefit from the project; it's analogous to allowing an interstate highway to be built through Baker County without any on or off ramps.

Baker County continues to object to this project. However, in the event the Energy Facility Siting Council were to approve this application, the following matters included in the Draft Proposed Order (DPO) require either further review or amendment, as appropriate:

Section IV Evaluation of Council Standards

- Throughout the DPO, the applicant defers a number of important plans such as weed management, emergency response, transportation, and restoration of agricultural lands to a future date that will come after obtaining a Site Certificate. The deferral of these plans makes evaluating the accuracy of the information or the impact to Baker County nearly impossible, and the sparse information provided as part of the application is insufficient for determining compliance with the applicable standards. The DPO deals with these deferred plans by generally stating that they will be approved by the ODOE staff with

opportunity to comment by the County. The details of these plans matter, and Baker County objects to the premise that plans tied to satisfying a review standard can be created outside the process without coordination with the impacted entity or dispute resolution opportunity. Baker County requests that plans impacting Baker County be coordinated with Baker County, either by the applicant or through ODOE staff. If agreement cannot be reached between the applicant, Baker County and the ODOE staff, a dispute resolution process is appropriate and should be outlined prior to the final decision.

- We request that Recommended General Standard of Review 6 on page 53 line 15 under (c) be amended to add local governments be added as follows: In compliance with all applicable permit requirements of other state agencies *and local governments*.

Section IV.E. Land Use

- The Statewide Planning Goals are evaluated beginning on page 216 at line 21 and continues to page 222 at line 22. Goals 1 – 9, then 12 are discussed; Goals 10, 11, 13 and 14 are not evaluated. The proposal discusses housing stock impacts, which would fall under Goal 10; the impacts to various public services and urban communities are discussed, which would fall under Goals 11 and 14; and since this project is an energy project; energy would fall under Goal 13.
- The County setbacks set forth in BCZSO 401(B) apply to all "structures" as defined in BCZSO 108a(B). Recommended Land Use Condition 10 on page 180 attempts to require compliance with these setbacks, but does not use the term "structures." Instead, the language applies the setbacks only to "buildings" and "the fixed bases of transmission towers," on the theory that these are the only kinds of "structures" that will be built in Baker County as part of the project. That may be, but the condition should nonetheless impose the setbacks on all "structures" as defined in the BCZSO, so as to capture any other structures that may not be anticipated as part of the project at this time. Baker County requests that each of clauses a. through d. of Recommended Land Use Condition 10 should be changed to apply the setbacks to all "structures" as that term is defined in BCZSO 108a(B). This inconsistency was raised in Baker County's comments on the ASC dated December 14, 2018 but not corrected in the DPO.
- Since some of the agricultural land restoration measures to be described in the final Agricultural Assessment expressly will take place after construction is complete, Land Use Condition 14 should be amended accordingly to require compliance with the Agricultural Assessment both during and after construction.
- On page 175-177, the criteria and evaluation of the Virtue Flat Oregon trail is discussed. The applicant notes that the resource is included in the Baker County Comprehensive Plan inventory of Historic and Cultural Sites, Structures, Districts, and proposes an intensive level survey to be consistent with the County's standard included in the BCZSO Section 412. However, the criteria in Section 412 require,

“At the hearing before the Planning Commission a review will be conducted to determine:

- a. If the change will destroy the integrity of the resource.*
- b. If the proposal can be modified to eliminate its destructive aspects.*
- c. If any agency or individual is willing to compensate the resource owner for the protection of the resource.*
- d. If the resource can be moved to another location.*

If, after this review, it is determined by the County that the integrity of a significant historic/cultural structure or other to allow, allow with conditions, or disallow the proposed change.

A survey alone, without protection measures explicitly required, does not satisfy the standard. To permit the County to meaningfully evaluate the proposed mitigation for impacts on County-designated historic resources, Historic, Cultural, and Archaeological Resources Condition 2 should be modified to require a copy of the final Historic Property Management Plan be provided to the County (and other SAGs).

- Forgive me if this is due to an oversight on my part, but through reading and a word search, I was unable to find an analysis for the Virtue Flat Mining Area (a County historical resource). This was brought forward in Baker County's comments on the ASC dated December 14, 2018, but appears not to have been corrected in the DPO.
- On page 176-177, with respect to the Flagstaff Hill Monument historic resource designated by Baker County, the DPO merely concludes "the Project will not affect the characteristics that make the monument important," but does not explain what those important characteristics are or how the Project will not affect them. This conclusory statement is insufficient for the County to evaluate whether IPC is justified in deciding to not conduct further analysis of this resource, and was brought forward in our comments on December 14, 2018 but not corrected in the DPO.
- Page 217 includes a description of the applicant's attempts to minimize impacts on agricultural operations, but the current route in the Durkee Valley does not reflect that. Baker County also reiterates its concern, originally expressed in its comment letter dated October 2, 2017, and again on December 14, 2018 that route selection near Durkee overemphasized resource values on the BLM property and improperly minimized impacts to nearby private agricultural lands, thereby avoiding BLM property to the maximum extent possible. The proposed route unnecessarily bisects agricultural parcels to the detriment of the landowners despite the fact that alternative routes across those parcels with less adverse impacts are available. Baker County and IPC have reached an agreement in principle to amend the proposed route in the general vicinity of Durkee so that the route, while still on private agricultural lands, has less adverse impacts to Goal 3 values; however, as currently described in the ASC, the proposed route does not implement that agreement. Consequently, Baker County finds that the analysis in the DPO, with respect to the proposed route near Durkee is insufficient to comply with Oregon's protections afforded agricultural land under Goal 3. Additional impacts have been identified in the current proposal that would negatively impact a property owner's (Nygard) domestic water supply, which

is provided by a spring. The amended route discussed above would avoid those impacts, but the current route is likely to be largely detrimental to the landowner's spring.

Section IV.H.1. General Fish and Wildlife Habitat Mitigation Goals and Standards

- Page 282, beginning on line 23, outlines the applicant's plan to address the Fish and Wildlife Habitat standards in OAR 345-022-0060 by finalizing a weed plan currently in draft form. Baker County has a specific interest in the finalization of the weed plan for the purpose of preventing the spread of weeds across the entirety of the project in Baker County, including agricultural lands, right-of-ways, and sensitive sage grouse habitat. As you may be aware, there are serious concerns about the Sage-grouse population in the Baker PAC, and it is a matter of utmost importance to Baker County habitat degradation be prevented.

Attachment P1-5 (Draft Noxious Weed Plan) includes the statement, "*For EFSC purposes, 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.*" This statement is contradictory to the Oregon Weed Law identified in ORS 569.390: "*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*". The remainder of the statement included on page 3 of Attachment p1-5 implies that the applicant intends to comply with ORS 569, however, if an existing weed infestation is identified, it's important that spread is prevented regardless of the outcome of the applicant working with the landowner or land management agency.

The applicant has committed to managing noxious weeds consistent with ORS 569 and the Baker County Noxious Weed Management Plan. Recommended Fish and Wildlife Condition 3, in turn, obligates the applicant to obtain final ODOE approval of its Noxious Weed Plan. Again, the rationale for providing final plans to the County (and other SAGs) applies here – Baker County should have the opportunity to review the final plan to ensure it complies with the Baker County Noxious Weed Management Plan. Fish and Wildlife Condition 6 should be revised accordingly.

IPC has committed to working with the County on this matter, and the County requests this be included as a condition.

Baker County requests the following amendments to Recommended Fish and Wildlife Condition 3, or inclusion of an additional condition:

- Assurance written into the text of the condition that the spread of existing weed infestations is prevented.
- Baker County should have the opportunity to review the final plan to ensure it complies with the Baker County Noxious Weed Management Plan
- A contractor with extensive knowledge of the local weeds and best methods for control is utilized by the applicant.

- Baker County reiterates its recommendation that a condition of approval be adopted obligating IPC to provide a bond specifically to secure its weed management obligations. This bond should remain in place until 10 years after construction of the project is complete. Weed management is an ongoing obligation during project construction and operation, not just an obligation associated with retirement and decommissioning.

Section IV.J Scenic Resources

An analysis of the scenic resources in Baker County that would be impacted by the project begins on page 357. Approximately fifteen of the scenic resources evaluated are in Baker County, a number of which are significantly visually impacted. Over 70 miles of transmission line are proposed transecting Baker County, the cumulative visual impact is both large, and largely unmitigated. Baker County is known for its scenic quality, and a 500 kV transmission line will be detrimental to those qualities, which will in turn harm both the Baker County tourism industry and the scenic qualities residents enjoy. Baker County disagrees with the statement made in a number of the scenic resources evaluations that there will be impacts, but because other siting choices are not ideal, the scenic resource is not impacted. Other siting factors do not change the scenic impact, and the impacts are not appropriately mitigated.

- Regarding NHOTIC, Baker County agrees with Recommended Scenic Resources Condition 2 as partial mitigation for the visual impact to the Center, especially the proposal for the lower H-frame structures. Baker County is appreciative of the information provided in the errata documents describing the potential impacts of an underground line in the area. It's clear that the impact to landowners would be unacceptable along the proposed route in proximity to the NHOTIC, and the visual impacts would still be significant.

Scenic Resources Condition 2: During construction, to avoid significant adverse impacts to the scenic resources at the National Historic Oregon Trail Interpretative Center, the certificate holder shall construct the facility using tower structures that meet the following criteria between approximately Milepost 145.1 and Milepost 146.6:

a. H-frames;

b. Tower height no greater than 130 feet; and

c. Weathered steel (or an equivalent coating).

Additionally, the certificate holder shall construct the facility using tower structures that meet the following criteria between approximately Milepost 146.6 and Milepost 146.7:

a. H-frames;

b. Tower height no greater than 154 feet; and

c. Weathered steel (or an equivalent coating).

IV.M Public Services

- The listing of fire departments found in Table PS-9 on pages 505 and 506 does not list the Huntington Fire Department, however, it appears the project will be within their response area. Page 193 line 11 notes that a multi-use yard will be within the City of Huntington, other project components appear to be in close proximity. This concern was brought forward in comments submitted on December 14, 2018 but has not been corrected in the DPO.
- Baker County reiterates its concerns expressed in prior comments that the ASC provides insufficient mitigation for fire risk and medical emergencies. With respect to fire, much of the land in Baker County has minimal fire protection available.
- Lines 2-8 on page 508 state that lands that are not within a fire district will be covered by mutual aid. While that may be true under ideal circumstances, in areas outside of a fire district or association, there is no guarantee of fire response. Mutual aid agreements as used in this context are between two fire response organizations who have like resources to 'trade', they are not made to cover lands that don't fall within any jurisdiction's response territory. The assumptions made in the ASC are therefore not accurate, and cannot be utilized to demonstrate compliance with the public services standard because they do not accurately account for the project's impact or the reality of fire response in the project area. Baker County disagrees with the statement that the project will not have significant impacts on fire protection services. The DPO describes precisely why the fire protection impact is significant – most construction will occur during hot and dry weather, when fire risk is highest, in grassland and shrub-dominated landscapes particularly vulnerable to fire. Project construction involves many potential fire-inducing activities including use of motorized vehicles and equipment, welding, refueling and smoking. As we know from the last few summers, fire risk is already elevated in eastern Oregon even without introducing increased fire hazards into remote areas. Given the high fire risk and the minimal available public services, IPC needs a more robust Fire Prevention and Suppression Plan. IPC needs to be required to provide meaningful mitigation for the impact, such as a full complement of fire protection equipment and trained firefighting personnel on site during construction, as well as an emergency plan coordinated with the County Emergency Management staff. This plan must be coordinated with the County and fire response agencies. IPC has committed to working with the County on this matter, and the County requests this be included as a condition.
- Lines 35-36 on page 508 identify calling the nearest fire response agency as part of the protocol for responding to a fire start. Baker County requests this language be updated to state that fire starts will be reported to the appropriate fire dispatch center, the numbers for which will be included in an emergency response plan all onsite project managers carry a copy of at all times, or by calling 911.
- Page 511 lines 9-14 discuss a hazard brought to the applicant's attention about fighting fire near energized power lines, and a statement is included that the applicant will provide firefighting agencies contact information for their dispatch center. Baker County requests this element be explicitly included as a part of the conditions of approval so it is not overlooked.

- Recommended Public Service Condition 5 requires coordination with each County's Planning Department, but the Planning Department is not a representative of fire response agencies. Replacing this language with just "County and impacted fire response agencies" will allow for the appropriate review to take place.
- With regard to medical emergencies, response times to some portions of the project route can exceed one hour, which could then be followed by long travel to a hospital in Baker City, La Grande, Ontario or even Boise depending on the event. To improve response time, IPC should be required to develop a specific Medical Response Plan and have all onsite project managers carry a copy of the plan at all times. The plan should specifically require advance notice to ambulance and life-flight services of active construction locations, and should pre-identify life-flight landing locations near the work zone. If predicted response times are likely to adversely impact an ambulance service provider's ability to provide services, and it's reasonable to believe having an ambulance committed to a call for multiple hours will, IPC is required to mitigate the impact. This plan must be coordinated with the County and medical response providers. IPC has committed to working with the County on this matter, and the County requests this be included as a condition.

If you have any questions or would like further information on Baker County's comments, please contact me by calling 541-523-8219 or by e-mail at hkerns@bakercounty.org.

Sincerely,



Holly Kerns
Planning 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) MARK BEKINGET - COMMISSIONER

Mailing Address (mandatory) 1995 Third Street
Baker City

Phone Number (optional) (541) 523-8200 Email Address (optional) wbennet@hobackercounty.org

Today's Date: 6/19/19

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

Written comments can also be submitted today.

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

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

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

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

<p style="text-align: right;">Page 22</p> <p>1 Please be respectful of the allotted time and the other 2 speakers. 3 If I or a Council member asks a person giving 4 testimony questions, the time will be stopped for the 5 question and response time, and then restarted to 6 provide the commenter the full time allotted. Any 7 requests made to EFSC will be brought up at the 8 conclusion of the public testimony opportunity of the 9 hearing. 10 Today's hearing, as well as all of the public 11 hearings on the B2H draft proposed order are being 12 documented by a certified court reporter, and there will 13 be transcripts of the testimony made available after 14 completion of the public hearings. We are also 15 recording today's hearings. The presentations, written 16 comments, and oral testimony are part of the decision 17 record for the proposed facility. 18 Now, here's the important stuff that we need 19 to get on the record. Pursuant to OAR 20 345-015-0220(5)(a) and (b), please note the following: 21 "A person who intends to raise any issue that may be the 22 basis for a contested case must raise the issue in 23 person at the hearing or in a written comment submitted 24 to the Department of Energy before the July 23rd 25 deadline stated in the notice of the public hearing.</p>	<p style="text-align: right;">Page 24</p> <p>1 representing Baker County Board of Commissioners. So 2 thank you to Vice Chair Jenkins, Hanley, and the rest of 3 the members. Thank you once again. 4 Baker County would like to, as I mentioned, 5 thank you for coming out here, meeting and hearing the 6 folks. Baker County has participated in this project 7 for actually 12 years. Prior to even the initial onset, 8 we met with Idaho Power and discussed the vision I guess 9 at that point. So we have really been engaged from the 10 get-go on this entire project. 11 We can safely say, between my colleague 12 Planning Director Holly Kerns and myself, we have not 13 missed one meeting through the entire process, through 14 the BLM process, through the Community Advisory Process 15 that Idaho Power put on, and also comments and 16 objections during the entire process. 17 Baker County's position from the get-go, and 18 continues to this day, is that we do not support a line 19 going through Baker County for 71 miles; 71 miles of our 20 county is being transected by this line. And 25 percent 21 of the entire project is in Baker County, and yet the 22 critical point is, Baker County has not received any 23 mitigation in the form of a point of presence here. 24 This is not in keeping with our comprehensive land use 25 plan, which says -- and I'm paraphrasing here -- I</p>
<p style="text-align: right;">Page 23</p> <p>1 "A person who intends to raise any issue that 2 may be the basis for a contested case must raise the 3 issue with sufficient specificity to afford the Council, 4 the Department of Energy and the applicant an adequate 5 opportunity to respond, including a statement of facts 6 that support the person's position on the issue. 7 To raise an issue in a contested case 8 proceeding, the issue must be: Within the Council's 9 jurisdiction; raised in writing or in person prior to 10 the close of the record of the hearing comment period, 11 July 23, 2019; raised with sufficient specificity to 12 afford the Council, the Department, and the applicant an 13 adequate opportunity to respond; to raise an issue with 14 sufficient specificity a person must present facts that 15 support the person's position on the issue. 16 We'll now begin with the public testimony. I 17 have 5:01 p.m. And a reminder, when you sit down to 18 give your testimony, please provide your name and 19 address for the record at the beginning of your 20 testimony. 21 The first person to call up is Mark Bennett, 22 and then after Mr. Bennett, we'll hear from Whit 23 Deschner. 24 MR. MARK BENNETT: Good evening. Welcome to 25 Baker County. I'm Mark Bennett, Commissioner, and</p>	<p style="text-align: right;">Page 25</p> <p>1 should mention that we will be submitting written 2 comments. I'm going to give kind of a 747 view of the 3 project from our eyes, but we will submit by the 23rd 4 comments. 5 But 25 percent of this entire project is in 6 Baker County. And we do not have a substation, we do 7 not have any opportunity to directly utilize the line, 8 which is a requirement within our comprehensive land use 9 plan. There is no direct benefits, as I mentioned, to 10 the economy or to the environment of Baker County. And 11 the impact to the Baker County economic drivers outweigh 12 the minimal tax benefits that the County will be 13 receiving. 14 Baker County participated, along with our 15 community, in a year-long process initiated by Idaho 16 Power, called the Community Advisory Process. This 17 process caused our communities to view that their voice 18 would be heard. That was set aside and actually thrown 19 in the dustbin when we went through the NEPA process. 20 Because at that point, here you have 83 percent of this 21 line on private lands and yet for less than 20 percent 22 ownership, the federal government dictated where this 23 line would go. They obviously, surprisingly not, they 24 dictated that it wouldn't be on federal lands but it 25 would be impacting private lands. 73 percent of this</p>

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1 line is on private lands in Baker County and yet the
2 Baker County voice is silenced in a number of these
3 areas.
4 As I said, the outcome, and I really recall
5 one of my constituents here, Bruce Owens, going, You
6 know, Mark, we don't want this line but if we can come
7 up with this route, it will be tolerable. I didn't ask
8 you, Bruce, hopefully I didn't get you out of context
9 there.
10 But that to me is really sad. It's really sad
11 as an elected official. This is a David-Goliath type of
12 a situation. Baker County utilized its resources, and
13 we're a small county, to attend those meetings, to
14 perform context. And I do have to really thank the
15 Oregon Department of Energy, Todd and his staff, they
16 assisted us and worked with us the entire time. They
17 were able -- and the Council was able to give us some
18 funding for comments later on. But all during the NEPA
19 process, the counties bore the cost all by themselves.
20 And I guess that's for good or bad but that's the way it
21 is.
22 Shifting the direction, as mentioned earlier,
23 Baker County has two principal economic drivers or
24 engines: Agriculture, which is primarily the beef
25 industry; and tourism. We have the uninterrupted

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1 viewshed, we have wildlife, solitude, and as Kellen so
2 adequately addressed, the NHOTIC, or the National
3 Historic Oregon Trail Interpretive Center.
4 But both of these economic drivers are
5 impacted by this project. As I mentioned earlier, a
6 71-mile long freeway, 83 percent of the private land
7 transecting Baker County with no on or off-ramps,
8 25 percent of this entire project.
9 The ag industry will be impacted through the
10 placement of towers on the EFU lands nearly the entire
11 route, and on the high-value grounds as you look out
12 here in Baker valley.
13 And it's also important to note that in Baker
14 County, in excess of 70 percent of the producers are
15 64 years of age or older. The application fails to
16 address this social justice issue. And I serve on the
17 Governor's Ag Heritage Commission and am well aware of
18 this throughout the state of Oregon. The expectation
19 that folks in this age bracket are able to review and
20 respond to the thousands of pages created by this
21 project are, at best, incredulous and sadly
22 discouraging. The taxpayers would be victimized by the
23 companies and agencies who have an expectation of them
24 to not only digest the work but make detailed responses
25 to this extensive criteria.

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1 Hanley and I were laughing at the beginning.
2 We have 7 feet long of records and I don't even know how
3 many file boxes.
4 Ag is not only directly affected -- or
5 threatened by the line, there is an inaccurate invasive
6 weed section. Your draft order fails to provide
7 continuous inspections and treatment for the life of the
8 project. The wildfire section does not address the
9 risks that occurred in the Paradise disaster. Lack of
10 long-term support to the rural fire agencies, the roads
11 impact. Just mentioning the more superficial areas of
12 weakness.
13 Perhaps the largest unaddressed threat is on
14 the horizon. The proposed line placement will transect
15 Baker County, causing the Baker County sage-grouse
16 primary area of concern, which is the northwestern-most
17 population of sage-grouse, greater sage-grouse, to be
18 isolated from the remainder of all sage-grouse habitat
19 and populations in the western United States. This in
20 turn may, at a future date, result in a review of the
21 Baker pack and a determination that it's a distinct
22 subpopulation, which would then cause a listing of the
23 bird as a threatened and endangered species within Baker
24 County. This will devastate the cattle industry and the
25 economy of the county. Once again, no mitigation has

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1 been offered.
2 In the interest that I've gone on a little
3 longer, I'm going to quickly just jump to the bottom.
4 And here's -- even though I'm speaking for my three
5 colleagues, too, I was going to beg for more time.
6 HEARING OFFICER WEBSTER: Do you need more
7 time? We can --
8 MR. MARK BENNETT: I probably need about
9 2 minutes more.
10 HEARING OFFICER WEBSTER: That's fine.
11 MR. MARK BENNETT: Thank you.
12 As Kellen pointed out, the NHOTIC, National
13 Historic Oregon Trail Interpretive Center, is best
14 described as the crown jewel of eastern Oregon tourism.
15 Individuals travel daily from all over the world to
16 connect with the Oregon Trail. The line will be in the
17 front picture window of the NHOTIC, the Trail
18 Interpretive Center. And no mitigation offered.
19 Baker County and the community has requested
20 time and time again that a study be conducted to
21 determine the feasibility, or that it doesn't work, of
22 burying the line over that period, and we continue to
23 put that request forward. And we would request that it
24 be an ODOE directed to the panel in that analysis.
25 We also request that there is no impact to the

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1 ag industry without mitigation, and we will provide a
2 detailed summary of those impacts.
3 Probably one that's near and dear to our
4 hearts is that the county ag producers and Idaho
5 Power -- and I want to compliment the field staff, they
6 have worked closely with that -- but bureaucracies, be
7 what they may, it hasn't come. We've requested a line
8 placement movement, a micrositing, within the Durkee
9 area, and at this point it hasn't occurred. And we
10 would request, as a condition of approval, that the
11 Council direct that this occur. That it meets the
12 needs, that, once again, that it causes the least impact
13 to the landscape and to those managing the land here and
14 to the residents. Once again, these residents are in
15 excess of 65, 70 years old, and impacting their entire
16 life and their way of life is just really tough.
17 We also, in closing, request that the Baker
18 County comprehensive land use plan requirement of
19 benefit to Baker County be met in that a guaranteed
20 point of presence be placed in Baker County to serve as
21 mitigation to meet future requirements for needs of the
22 economy of Baker County.
23 Are there any questions?
24 HEARING OFFICER WEBSTER: No. Thank you.
25 MR. MARK BENNETT: Thank you very much.

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1 HEARING OFFICER WEBSTER: After we hear from
2 Mr. -- assuming it's Mr. Deschner, it will be Karen
3 Yeakley.
4 MR. WHIT DESCHNER: My name is Whit Deschner.
5 I live at 1640 3rd Street, Baker.
6 I want to preempt this speech, out of
7 frustration, if I say anything to Idaho Power about
8 Idaho Power, please don't take it personally. You're
9 probably real nice people.
10 I appreciate the Council for hearing me. And
11 I appreciate Marcy Grail for recusing herself off of
12 this case. And also I want to thank Mark Bennett and
13 Holly for their work on this.
14 Upon reviewing the discrepancy in the 20,000
15 or so EFSC standards in Oregon Administration Rule, I
16 have found a serious flaw. Oregon Administration Rule
17 345-025-0007 is missing. Upon further investigation, I
18 discovered that the key set of OARs was redacted with
19 white-out. I failed to find the original version but I
20 have a good idea why this was omitted. Unfortunately, I
21 can't replicate the legalese of this administrative rule
22 nor do I speak the language but I can give you the gist.
23 HEARING OFFICER WEBSTER: Mr. Deschner, if you
24 want to slow down just a stitch so that the court
25 reporter can take everything down.

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1 MR. WHIT DESCHNER: OAR 345-025-0007, the real
2 issues.
3 Ethics.
4 (a) in 2007, B2H was announced. No vote was
5 offered whether the people wanted it or not.
6 (b) Under Governor Tom McCall, an energy
7 corridor was established for high-voltage power line
8 routes. It was a low-impact route. When Idaho Power
9 proposed B2H, they either ignored or deemed this route
10 too costly.
11 (c) Idaho Power is a for-profit corporation
12 traded on the New York Stock Exchange.
13 Roman numeral i. This brings up conflicts of
14 interests. What is right for IPC's shareholders is not
15 always in the best interest of the public. Idaho Power
16 Corporation will turn a profit to satisfy shareholders
17 at the expense of Baker County and eastern Oregon. With
18 sparse population, Idaho Power rides roughshod through
19 the county, dictating how and where they choose to run
20 the line.
21 Also, Roman numeral ii. A crooked playing
22 field. Opponents are not given adequate or the same
23 amount of time as Oregon Department of Energy or Idaho
24 Power to review new documents or developments.
25 And Roman numeral iii. Skewed data, like

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1 averaging numbers to falsify state or bend IPC's
2 position.
3 (d) The Interpretive Center opened in 1992
4 through a highly effective partnership of local, state,
5 and federal government agencies, nonprofit
6 organizations, and local residents. I'll read that
7 again.
8 The Interpretive Center opened in 1992 through
9 a highly effective partnership of local, state, and
10 federal government agencies, nonprofit organizations,
11 and local residents. There was a gentlemen's
12 understanding that nothing would be built in the
13 viewshed of the Center, nor did anyone dream that the
14 view would be degraded in such a manner. Nothing was
15 signed but this was Baker and handshakes were valid and
16 honored.
17 (e) Idaho Power is proposing to blatantly run
18 their up to 190-foot tall pylons in front of the BLM's
19 Oregon Trail Interpretive Center. Where is the BLM's
20 voice in all of this? Why are they allowing a
21 corporation to build in front of the BLM historical
22 center, ruining the whole historical presentation of
23 what the taxpayers' \$16 million national showcase
24 interpretive center represents?
25 Conclusion.



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 Nichols - Baker ^{County} Commissioner

Mailing Address (mandatory) 1140 F St
Baker City, OR 97814

Phone Number (optional) () _____ Email Address (optional) brucenichols@pcn@gmail.com

Today's Date: 6-19-19

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

no mitigation ~~want~~

Duckee - made agreements with property - farm ground

ODOE - Conduct analysis of burial to mitigate

visual impact of interpretive center

OR compensory mitigation for Baker County

Comply with Baker County Landuse Plan - ^{We need a} substitution

for Baker County Economic Development - more power ~~for~~
business + manufact

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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

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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

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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

Page 64

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

TARDAEWETHER Kellen * ODOE

From: Carla McLane <cmclane@co.morrow.or.us>
Sent: Thursday, August 22, 2019 9:30 AM
To: TARDAEWETHER Kellen * ODOE
Cc: Roberta Lutcher; Darrell Green; Melissa Lindsay; RUSSELL Don; Jim Doherty; Matt Scrivner; Sandra Pointer; Dave Pranger; Maffuccio, Jeff; Steve Rhea; rusty2550@yahoo.com; mrogelstad@boardmanfd.com; mbroadbent@boardmanfd.com; heppnerchamber@centurytel.net
Subject: [Fortimail Spam Detected] Morrow County: B2H DPO Comment Letter
Attachments: 08222019 B2H DPO Comment Letter signed.pdf

Kellen,
Please find attached the Morrow County comment on the B2H DPO.
Sorry we'll miss you this afternoon. Don't get to buried in these comment letters!!
Cordially,
Carla

Carla McLane, MBA
Morrow County Planning Director
205 Third Street NE
Post Office Box 40
Irrigon, Oregon 97844
541-922-4624
cmclane@co.morrow.or.us



PLANNING DEPARTMENT

PO Box 40 • 205 Third Street NE
Irrigon, Oregon 97844
(541) 922-4624

August 19, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, Oregon 97301

Ms. Tardaewether, *Kellen*

This letter, prepared and delivered by the Morrow County Planning Director, is comment from the Morrow County Board of Commissioners, serving as the Special Advisory Group, or SAG, for the Boardman to Hemingway transmission line project. It is hard to believe that we are finally here. Morrow County's involvement in this project dates back to 2007, now a dozen years ago.

In reviewing the Draft Proposed Order (DPO) the following have come to our attention that we are asking for either further review or amendment, as appropriate:

- Pine City Road: On page 23, line 27, there is a reference to Pine City Road. There is not a Pine City Road in Morrow County. In previous comment Morrow County identified that the misnamed road is most likely Little Butter Creek Road (Morrow County comment letter 09142017).
- General Standard of Review: This discussion begins on page 47 line 17. There are two comments related to this section.
 - A typographical error occurs on pages 50, 51 and 53 in the heading of Conditions 1, 2 and 5 where the words "Standard of Review" are currently written as "of Review Standard."
 - Morrow County would like to request that as part of Recommended General Standard of Review 6 on page 53 line 15 under (c) the counties be added as follows: In compliance with all applicable permit requirements of other state agencies *and counties*.
- Land Use: The discussion of land use begins on page 95 line 32 with the Morrow County discussion beginning on page 100 line 20. As part of the discussion concerning facility components on land zone General Industrial and Port Industrial there is a clear requirement for the facility to obtain a Zoning Permit. However, no Zoning Permit is called out in Land Use Condition 1(a). We ask that this be added to that list of necessary permits.

Because the transmission line is an "utility facility necessary" and is not subject to Conditional Use Permit review, coupled with the goalpost rule retaining review under an older version of the Morrow County Zoning Ordinance, there is a bit of frustration in that the Department has determined that no permits should be issued for the facility on land zoned as Exclusive Farm Use. Other recent transmission line permits that have been issued in Morrow County have been

completed as a Land Use Decision, requiring notice and review under the standards found in Oregon Revised Statute 215.275. Morrow County would request that a requirement be added to Land Use Condition 1 requiring the applicant to obtain a Land Use Decision for the portion of transmission facility on land zoned for Exclusive Farm Use. This would keep Morrow County whole under Oregon Revised Statute 469.401 by allowing us to issue a permit and retaining our authority to obtain an application fee.

- **Statewide Planning Goals:** An evaluation of the Statewide Planning Goals begins on page 216 at line 21 and continues to page 222 line 24 where the Goal 4 Exception discussion begins. Goal 1 through 9 and then 12 are discussed; not identified or discussed are Goal 10, 11, 13 and 14. Yet each of those aspects of Statewide planning are contained within the DPO. Temporary housing and impacts to housing stock is discussed (Goal 10); the need for various public services and impacts to urban communities are reviewed (Goals 11 and 14); and the entire notion of this project being reviewed by the Oregon Department of Energy should warrant some discussion about energy (Goal 13). I am confident, based on the discussion of these activities throughout the DPO as well as the discussion of the other Statewide Planning Goals, that Department staff should be able to address these four Statewide Planning Goals.
- **Scenic Bikeways:** On page 452 within Table R-1: Important Recreation Opportunities, the counties where the Grand Tour Scenic Bikeway and the Blue Mountain Scenic Bikeway are identified have been transposed.
- **Traffic Safety:** Starting on page 484 line 15 is the discussion of Traffic Safety. Morrow County would like to request that as part of Public Services Condition 1(b)(iii) a requirement for the applicant to include as part of their submittal Geographic Information System (GIS) shape files also be submitted to facilitate permit processing within the various review departments of Morrow County. This request could also be incorporated into Land Use Condition 1(a) or Land Use Condition 2.
- **Fire Protection:** The discussion of Fire Protection starts on page 504 line 7 and continues to page 511 line 29. Two comments follow concerned with the discussion of fire protection.
 - The listing of fire departments found in Table PS-9 on pages 505 and 506 does not list the Heppner Rural Fire Protection District, however a portion of the proposed route does travel through their service territory.
 - Morrow County is concerned that this section, as well as the earlier section addressing forest practices, identifies fire protection and prevention concerns with a focus on forest land. Much of the proposed transmission line route in Morrow County, while not in forested areas, is still remote with a high risk for fire impacts. The distance from main fire stations within Heppner or Boardman could still require a significant period of time for either fire or emergency response to arrive on scene of an incident. The discussion should be broader to address this limited response time regardless of the vegetation in the area of construction. Morrow County would request that Conditions requiring the staging of fire response be applied to also address remote areas more generally.
- **Waste Minimization:** The Waste Minimization discussion begins on page 514 line 18 addressing most of the usual Morrow County concerns and incorporating our Solid Waste Ordinance provisions. We would like to add that any recycling that is accomplished by the applicant or contractors as part of the construction also report those recycling efforts in such a way as to

benefit the Morrow County watershed, a Department of Environmental Quality reporting requirement. This could be added to Waste Minimization Condition 1.

- Noxious Weed Plan: During review of the Noxious Weed Plan, Attachment P1-5 of the Draft Proposed Order, it was identified that several weeds which are present in Morrow County are identified as not being present. They are Cereal Rye, Ventenata, and Plumeless Thistle.

Thanks for the opportunity to comment on the Boardman to Hemingway transmission line project. The economic impact of the construction and the improvement to the delivery and movement of bulk power in the inland northwest will both be positive impacts to Morrow County. The Conditions that are proposed to be within the Final Order and Site Certificate hold the development accountable to potential impacts, balancing the project benefits with the impacts of a development of this scale.

Should you have any questions about this comment letter, or need further information, please contact me at 541-922-4624 or by email at cmclane@co.morrow.or.us.

Cordially,



Carla McLane
Planning Director

cc: Morrow County Board of Commissioners
Matt Scrivner and Sandra Pointer, Morrow County Public Works Director
Dave Pranger, Morrow County Weed Coordinator/Inspector
Jeff Maffuccio, Idaho Power Company
Steve Rhea and Rusty Estes, Heppner Fire District
Marc Rogelstad and Marty Broadbent, Boardman Rural Fire Protection District
Sheryll Bates, Willow Creek Valley Economic Development Group

TARDAEWETHER Kellen * ODOE

From: Robert Waldher <robert.waldher@umatillacounty.net>
Sent: Wednesday, August 21, 2019 10:39 AM
To: TARDAEWETHER Kellen * ODOE
Cc: WOODS Maxwell * ODOE; Doug Olsen
Subject: Umatilla County Comments on B2H DPO
Attachments: Umatilla County_DPO Comments_08-22-2019.pdf

Hello Kellen -

Please see the attached comment letter (dated for tomorrow) submitted on behalf of the Umatilla County Board of Commissioners for the Boardman to Hemingway Draft Proposed Order. You may contact me with any questions or concerns. Thank you!

Kind Regards -

Bob

--

Bob Waldher, RLA

Director

Umatilla County Department of Land Use Planning

216 SE 4th ST | Pendleton, OR 97801

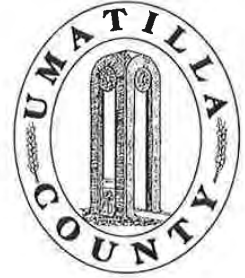
Phone: [541-278-6251](tel:541-278-6251) | Fax: [541-278-5480](tel:541-278-5480)

<http://www.umatillacounty.net/planning> - Visit our website for copies of planning documents, permit applications and other helpful information.

Please Be Aware - Documents such as emails, letters, maps, reports, etc. sent from or received by the Umatilla County Department of Land Use Planning are subject to Oregon Public Records law and are NOT CONFIDENTIAL. All such documents are available to the public upon request; costs for copies may be collected. This includes materials that may contain sensitive data or other information, and Umatilla County will not be held liable for its distribution.

Umatilla County

Board of County Commissioners



Commissioners

August 22, 2019

George L. Murdock
541-278-6202

John Shafer
541-278-6203

Kellen Tardaewether
Oregon Department of Energy
550 Capitol St N.E., 1st Floor
Salem, OR 97301

William J. Elfering
541-278-6201

Executive Secretary
Melinda Slatt
541-278-6204

County Counsel
Douglas Olsen
541-278-6208

Chief Financial
Officer
Robert Pahl
541-278-6209

RE: Umatilla County Comments on Boardman to Hemingway Transmission Line Draft Proposed Order

Umatilla County has reviewed the Draft Proposed Order (DPO) for the proposed Boardman to Hemingway (B2H) Transmission Line project. Please include the following comments in the project record for consideration by the Energy Facilities Siting Council (EFSC).

Page 125, Table LU-2 –The applicable substantive criteria for transmission lines in the Exclusive Farm Use zone is a Land Use Decision, not an outright permitted use as shown in the table.

Page 126, Line 27 –Utility Facility Necessary in the Exclusive Farm Use zone is a Land Use Decision, not an outright permitted use.

Page 143, Lines 33-40 – Umatilla County Development Code Section 152.612(D) outlines procedures for taking action on a Conditional Use or Land Use Decision and requires *an applicant granted a Conditional Use Permit or Land Use Decision to obtain a County Zoning Permit for EACH tax lot before establishing the approved use and/or commencing construction*. Umatilla County requests that Land Use Condition #3 be rewritten to require the applicant to obtain a County Zoning permit for EACH tax lot crossed by the proposed transmission line or multi-use area.

Page 143, Lines 41-42 – Umatilla County requests the applicant obtain a separate Access Permit for each approach from private property to/from a County public roadway, and a separate Utility Permit for each County roadway impacted by a utility crossing. Access and Utility Permits shall be obtained from Umatilla County Public Works.

Page 143, Line 43 – Umatilla County requests the applicant obtain a separate Floodplain Development permit for each individual location where development is proposed to occur within a regulatory floodplain.

Thank you for the opportunity to comment on the DPO. Please direct any follow-up questions or comments to Robert Waldher, County Planning Director. He can be reached by phone at 541-278-6251 or by email at robert.waldher@umatillacounty.net.

Respectfully,



George Murdock
Board Chair



Cc: Umatilla County Planning Department

TARDAEWETHER Kellen * ODOE

From: Scott Hartell <shartell@union-county.org>
Sent: Wednesday, July 10, 2019 7:47 AM
To: TARDAEWETHER Kellen * ODOE
Subject: DPO Corrections

Kellen,

Just a quick note on some changes you may want to make in the B2H DPO:

Page 147, Line 9: 2 Multi Use Areas in EFU Zone (MUA UN-03 and MUA UN-04) 1 Multi Use Area in Timber Grazing Zone (MUA UN-02).

Page 147, Line 26: Change Umatilla County to Union County.

Have a great day.

Scott Hartell
Union County Planning Director
1001 4th St. Suite C
La Grande, OR 97850
(541) 963-1014

TARDAEWETHER Kellen * ODOE

From: Scott Hartell <shartell@union-county.org>
Sent: Wednesday, August 21, 2019 10:10 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Union County B2H DPO Comments
Attachments: doc00675220190821100117.pdf

Kellen,

Please see attached and I will also send snail mail if needed.

Scott Hartell
Union County Planning Director
1001 4th St. Suite C
La Grande, OR 97850
(541) 963-1014



**UNION COUNTY
BOARD OF COMMISSIONERS**

Donna Beverage, Commissioner
R. Matthew Scarfo, Commissioner
Paul Anderes, Commissioner

Shelley Burgess, Administrative Officer

1106 K Avenue La Grande, OR 97850

PHONE (541)963-1001 FAX (541)963-1079

August 21, 2019

Oregon Department of Energy
Attn: Kellen Tardaewether
Senior Siting Analyst
550 Capitol St. NE Salem, OR 97301

RE: Union County Comments to the Boardman to Hemmingway 500kv Transmission Line,
Draft Proposed Order.

Dear Mrs. Tardaewether:

Union County believes that no portion of the B2H Project should be sited within Union County. However, to address the possibility that the Energy Facility Siting Council approves the B2H Project despite Union County's objections, the following should be included in the Final Order for review of Site Certificate.

1. Conflict Resolution

Idaho Power Company is taking the direction of gaining Site Certificate approval by addressing a majority of the standards and criteria that would be applicable to all five counties in Oregon and then recommending as approval conditions to conduct specific plans, like transportation routing, at a later date once Idaho Power Company selects a contractor to construct the B2H Project. Union County is not opposed to this tactic as it allows building a relationship between Union County and the Site Certificate holder and contractor impacting our county. However, Union County is concerned the Draft Proposed Order does not identify a clear path for conflict resolution between the county and Site Certificate holder/contractor if agreement is not reached in plan development with the local jurisdiction. Currently, the Draft Proposed Order only identifies developing the specific plan and turning it into the Oregon Department of Energy staff to satisfy the approval condition. Therefore, Union County is recommending the following for Oregon Department of Energy staff consideration:

Union County Request #1:

Oregon Department of Energy staff needs to clearly identify a process for conflict resolution between Union County and the Site Certificate holder or Site Certificate Holder's contractor for all approval conditions requiring plan development after Site Certificate approval is granted and prior to construction activities commencing in Union County. This shall be included in the language of the Site Certificate if approved.

2. Wildland Fire Danger

Union County is comprised of terrain that can be challenging to reach by emergency vehicles and during the summer months is usually under a high industrial fire precaution level. Since the building of a new 500kv high voltage transmission line in Union County is not a normal activity or occurrence, we feel there could be a greater potential for wildland fires because of the increased construction activity level in our County.

Union County Request #2:

During construction activities of the B2H Project in Union County, the Site Certificate holder will contract with a local Union County Wildlands Firefighting contractor, qualified by the Oregon Department of Forestry or the USDA Forest Service and have a Type 6 or Type 4 engine and crew on site at construction locations during all construction activities outside of multiuse areas.

3. Contact Information

Union County Request #3

During construction activities of the B2H Project the Site Certificate Holder and Site Certificate Holder's contractor(s) shall provide emergency contact information to the following: (Emergency contact information shall include individual's name, company individual works for, position individual holds within that company, phone number and business address).

Union County Sheriff's Office and Dispatch
Union County Emergency Services Office
Union County Public Works Department
City of La Grande Police Department
Oregon Department of Forestry
USDA Forest Service, La Grande Ranger Station
Blue Mountain Interagency Dispatch Center

4. Transmission Line Route

Union County Request #4

Union County requests Idaho Power Company or the Site Certificate Holder to use the Alternative Route identified in the application for Site Certificate of the B2H Project.

5. Transportation Routes

Based upon a review of maps supplied by Idaho Power Company (IPC), the following gravel roads will be impacted during construction of the B2H power line: Jimmy Creek, Olsen, Heber, Bushnell, Marvin, Hawthorne, Rock Creek and Dark Canyon. Depending on how the power line is constructed, and the types of construction equipment used, these roads will need additional maintenance before, during and post construction, including

blading, watering, rolling, additional ¼ - 0 gravel, and dust abatement in front of residents' homes. Union County Public Works Department will inspect each road before, during, and post construction, to evaluate the condition of the roads.

In addition to the roads listed, two additional gravel roads requiring special accommodation will be impacted during construction of the B2H power line: Morgan Lake Road and Glass Hill Road. Morgan Lake Road is a narrow gravel road two miles long, with a very steep grade (15% - 18%), that serves residents, cattle ranches, and access to Morgan Lake. Depending on the types of construction equipment that will use this road, maintenance will be needed, as mentioned above. Again, this road is very narrow and given the volume of traffic (400 ADT or greater during summer months) guard rails should be installed the full length of the road, and the road must be widened to accommodate two lanes of traffic. If guard rail modifications and widening cannot be completed, IPC should not use Morgan Lake Road and instead look for other alternatives to access the power line during construction.

Glass Hill Road is a gravel road and will need additional maintenance during construction as outlined above. In addition, at approximately mile post 1, from Morgan Lake Road, there is an active slide. IPC will be required during construction to monitor the slide and if movement occurs, the contractor will be required to clean culverts and ditches, install retaining walls, and remove any excess material to reduce the further movement of the road to ensure safe passage for residents and construction equipment.

Paved roads that will be used for construction are Foothill Road and Old Oregon Trail Road. According to Union County Public Works pavement management system, Foothill Road is in fair condition. If substantial damage occurs during construction, IPC and/or its contractor will return the road to the same condition. Union County Public Works will review the road before, during and after construction to evaluate damage to the existing road.

Old Oregon Trail Road is paved but in poor condition. If this road is used as a haul route for construction materials, IPC and/or its contractor will fix any further damage to the paved road. Union County Public Works will review the road before, during and after construction to evaluate damage to the existing road.

The total number of road approaches equals approximately 22. Each road approach will require a Work in Right of Way Permit. IPC's contractor can obtain these permits at the Union County Public Works office. Each permit will be evaluated by Union County Public Works to determine if culverts are needed, and approve location of the approach.

In summary, all roads that will be used to construct the B2H power line are farm to market roads and do not experience this type of construction traffic. Union County will require IPC to review the condition of the roads with Union County Public Works Director to develop a maintenance and safety plan that will keep Union County roads in current or better condition.

6. Noxious Weed Plan

The Union County has concerns regarding the repeated use of language within the Idaho Power Company's application for Site Certificate and in the Draft Proposed Order stating:

“IPC is not responsible for ...controlling or eradicating noxious weed species that were present prior to the Project” throughout the B2H Noxious Weed Plan, attachment P1-5 of the DPO. This statement is contradictory to the Oregon Weed Law identified in ORS 569.390: *“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”*. It is also very important to utilize a contractor with extensive knowledge of the local weeds we deal with in Union County and best methods for control.

Union County Request #5:

Union County requires a \$500,000 bond from IPC to pay for noxious weed control costs in the event that adequate weed control is not conducted by Idaho Power Company at any point over the initial 20 years of construction and operation of the B2H project (as determined by the county weed supervisor). This bond will help offset costs if the county must go through the enforcement process and contract the noxious weed treatments themselves. The bond amount is based on estimated contractor control costs for the roughly 3,500 acres of disturbed ground and Site Boundary areas along with 55 miles of disturbed/ new roads that will be within Union County.

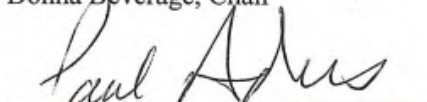
Union County Request #6:

During construction activities of the B2H Project in Union County, the Site Certificate holder will contract with a local North East Oregon noxious weed control operator, licensed by the Oregon Department of Agriculture for noxious weed control activities. After construction activities and for the life of the transmission line Oregon Revised Statute 569.390 will be used for the control of noxious weeds in Union County for all lands.

Union County Commissioners request the Oregon Department of Energy staff take these six issues under serious consideration and include them in the Final Order. If you have any questions please contact Scott Hartell, Union County Planning Director, at 541-931-1014.

Sincerely,


Donna Beverage, Chair


Paul Anderes, Commissioner


Matt Scarfo, Commissioner

ESTERSON Sarah * ODOE

From: Eric Evans <Eric.Evans@malheurco.org>
Sent: Thursday, August 22, 2019 7:14 AM
To: B2H DPOComments * ODOE
Subject: Malheur County SAG Comments
Attachments: B2H Comments - Malheur County.pdf

Kellen,

Please see the attached comments from Malheur County.

Thank you,

Eric Evans, REHS
Planning Director
Malheur County Planning & Zoning
251 B Street W #12
Vale, OR 97918
541-473-5185 – phone
541-473-5140 – fax



MALHEUR COUNTY PLANNING DEPARTMENT

251 B Street West, #12 Vale, Oregon 97918 Phone (541)473-5185 Fax (541)473-5140

August 21, 2019

Oregon Department of Energy
Attn: Kellen Tardaewether
Senior Siting Analyst
550 Capital Street NE
Salem, OR 97301

RE: Malheur County Comments to the Boardman to Hemmingway (B2H) Transmission Line
DPO

Ms. Tardaewether,

The Malheur County Special Advisory Group (SAG), represented by the Malheur County Court, has authorized the Malheur County Planning Director to prepare and deliver this letter as comment to the Draft Proposed Order (DPO) for the Boardman to Hemmingway Transmission Line.

The Malheur County Planning Director has reviewed the DPO for the proposed transmission line. Please include the following comments in the project record for consideration by the Energy Facility Siting Council (EFSC).

- I. Page 35, Line 22 discusses the prevention and suppression of wildfires in eastern Oregon, designating the task to BLM, USFS, and local fire districts and agencies. The majority of B2H is not located in a local fire district (see Attachment 1) in Malheur County. Instead, the wildfire suppression would be performed by BLM with the cooperation of the designated Rangeland Fire Protection Associations (RFPA) (see Attachments 2 & 3). Malheur County would like to see a Condition of Approval which would direct the Applicant to coordinate with the local RFPA's for wildfire prevention and suppression.
- II. Page 187, Line 2 indicates that development will occur on lands zoned RI (Rural Industrial). Rural Industrial is not a land zoning designation in Malheur County. Our analysis of the transmission line shows development on land designated C-I2 (formerly M-3 Heavy Industrial). Table LU-7 should be updated to include the requirements of Malheur County Code 6-3I. Also, Findings of Fact should be adopted by the Council to address the Performance Standards located in 6-3I-4.
- III. Page 187, Line 22 starts the discussion requiring a Floodplain Development Permit for Malheur County. The verbiage of this paragraph indicates that a single permit will cover the entire 75-mile route through the County. A Floodplain Development Permit will be required for each location where development will occur within a regulatory floodplain.

- IV. Page 187, Line 35 discusses the required setbacks from property lines. Malheur County Code 6-3A-6 requires a 15-foot setback from property lines, not the 25 feet stated in the DPO. The increased setback could cause additional encroachment harm to farmers, mostly in Exclusive Farm Use.
- V. Separate zoning permits will be required for the resource lands (EFU and ERU) and the Industrial lands in order to separately evaluate the zoning requirements for a total of two zoning permits.

Malheur County appreciates the opportunity to comment. Malheur County recognizes the positive financial impacts this project will produce within the County. These comments and recommended changes will balance the project's benefits with the impacts to the citizens of Malheur County.

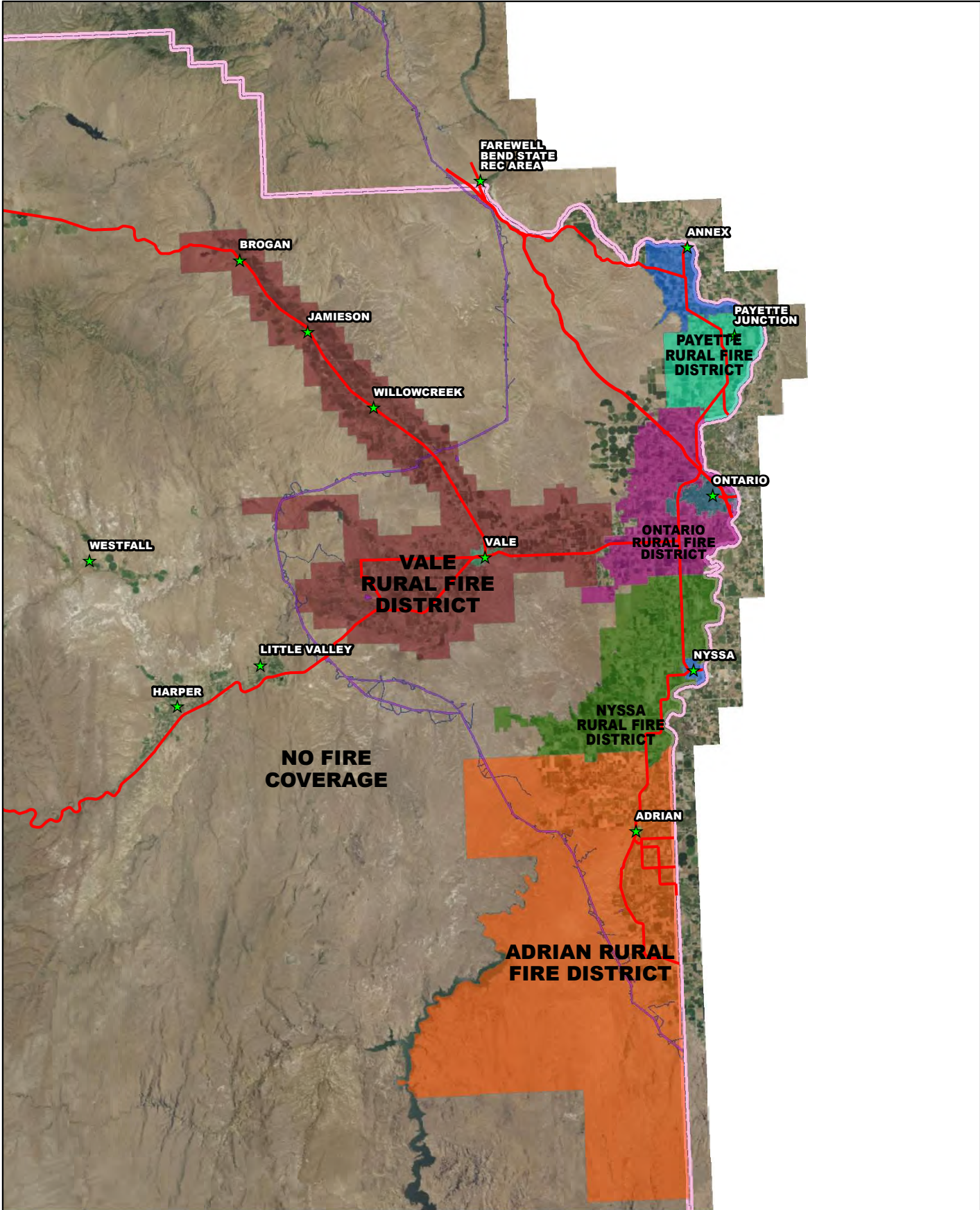
Should you have any questions, or need further information, please contact me using the information below.

Thank you,



Eric Evans, REHS
Malheur County
Planning Director
251 B Street W #12
Vale, Oregon 97918
Eric.Evans@malheurco.org
541-473-5185

Attachment



Map is prepared for assessment purposes only.

Attachment 2

Vale RFPA

Est. 2006

Chairman:
Toby McBride
541-881-6141

Secretary:
Bobby McElroy
541-473-3500
barthorses@gmail.com

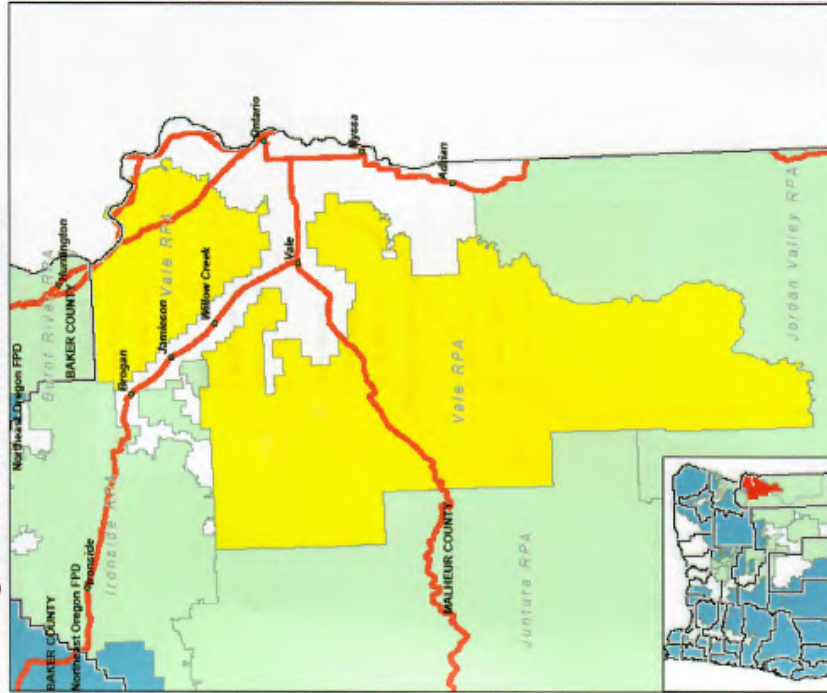
Directors:
Mark McBride
541-709-1367

Jeff Romans
541-358-2905

Jercid Holloway
541-473-4014

Address:
3760 Stage Rd
Vale, OR 97918

Exhibit A: Vale Rangeland Fire Protection Association



Prepared by: Gordon Foster
Date: August 16, 2016
Oregon Department of Forestry
Eastern Oregon Area
Rangeland Fire Program

Attachment 3

Jordan Valley RFPA

Est. 2008

President:

Silas Skinner
541-589-2253

rsranch77@icloud.com

Fire Supervisor/Secretary:

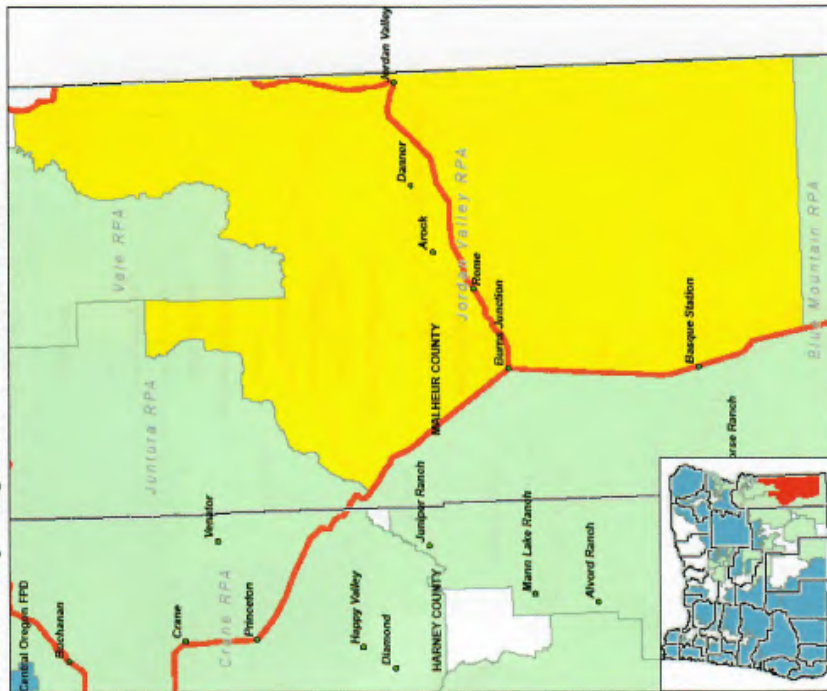
Clint Fillmore
541-586-2571

cifillmore91@gmail.com

Address:

PO Box 381
Jordan Valley, OR 97910

**Exhibit A:
Jordan Valley Rangeland Fire Protection Association**



Oregon Department of Forestry
Eastern Oregon Area
Rangeland Fire Program

Prepared by: Gordon Foster

Date: August 10, 2018



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) Stephen Clements

Mailing Address (mandatory) 1000 Adams Ave
La Grande, OR 97850

Phone Number (optional) () _____ Email Address (optional) mayor@cityoflagrande.org

Today's Date: 6/20/19

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

Written comments can also be submitted today.

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

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

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

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

Page 90

1 didn't BPA pull out? It's not in their budget; right?
2 The third partner pulled out. Why did they?
3 They already cancelled the big power line, or a small
4 power line they were planning from Portland north into
5 Washington; right? They cancelled that one. Now they
6 pulled out, at least according to their budget, B2H
7 isn't in their budget anymore.
8 Anyway, we're not getting good information
9 from Idaho Power. You're not getting good information
10 from Idaho Power. Don't rubber stamp this thing. Don't
11 check it off the box. Went to La Grande, went to
12 Pendleton; rubber stamp, build the line. Don't do it,
13 please. Don't do it. This is your chance. You have
14 the power to help Oregon.
15 Thank you for listening.
16 HEARING OFFICER WEBSTER: Thank you.
17 MR. STEVEN CLEMENTS: It's kind of hard to
18 come up here after that. Thank you, Pete.
19 My name is Steve Clements. I'm the mayor of
20 La Grande. My address is 1000 Adams Avenue.
21 Before I start to speak, I want to thank all
22 the people that came up here and spoke this evening.
23 I'm particularly impressed by the background that they
24 have, the work that they have done. They are to be
25 commended for all the time that they've put in. It's

Page 91

1 amazing. What I know about this project comes to about
2 this much relative to what they know (indicating).
3 Anyway, thank you for the opportunity to
4 present this evening. The La Grande City Council, which
5 represents more than 13,000 people who will be
6 negatively affected by this transmission line, has
7 provided comments through staff, through our city staff
8 at each of the steps in the process; so you have some of
9 our input already.
10 I will reiterate some of that and add to it.
11 In 2019 and '17, the La Grande City Council, in
12 partnership with the Union County Commissioners,
13 conducted two public meetings in this very room to hear
14 from residents regarding the project in conjunction with
15 the amended preliminary applications. Public sentiment
16 expressed at those meetings overwhelmingly opposed the
17 transmission line. You are hearing some of that this
18 evening.
19 The bases for that opposition included, but
20 was not limited to, reduced property values to homes
21 along the proposed route; viewshed impacts throughout
22 the area; environmental impacts both during construction
23 and when the transmission line is operational; impacts
24 to recreational facilities such as Morgan Lake; and a
25 lack of public notice and involvement throughout the

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1 process.
2 The La Grande City Council has been clear in
3 its opposition to the project beginning with its first
4 correspondence with ODOE in August of 2017 and again
5 this past April in a proclamation that it made opposing
6 the line. The City has also been consistent with its
7 request that EFSC include mitigation to address the
8 City's concerns if the project is approved.
9 We very much appreciate the inclusion of our
10 staff's recommended conditions related to transportation
11 and the impacts to Morgan Lake in the draft proposed
12 order. We are hopeful that the transportation and
13 conditions resolve the concerns raised by the City and
14 Union County throughout the process.
15 Of the two routes identified in the
16 application, the applicant has selected Mill Creek, the
17 most impactful to La Grande. It will be visible up here
18 on our end of the valley as the proposed route.
19 And the Morgan Lake, which also impacts City
20 property because that entire Morgan Lake Park belongs to
21 the City of La Grande. We have spent a lot of money up
22 there keeping it and improving it as a recreational
23 opportunity for people in this county. That is the
24 alternative route.
25 And I cannot say this more emphatically: We

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1 oppose, the City of La Grande opposes both of those
2 routes. And while I realize that the BLM-preferred
3 route is outside of your consideration, and I appreciate
4 what you gave us as guidelines before, the City Council
5 is very concerned about the decision by the applicant
6 not to submit the route which has lower social and
7 environmental impacts than the two identified routes. I
8 cannot understand why that route was not put in there,
9 personally.
10 For the proposed route, we ask that a
11 condition be included to require H-frames. We are
12 talking about mitigation. Now, these are requests that
13 we put forward. This is going to be somewhat different
14 than what you and I agreed to.
15 But for the proposed route we ask that a
16 condition be included, so that's the one up here, to
17 require H-frames with a tower height no greater than 130
18 feet, with weathered steel between milepost 106/2 and
19 milepost 108/5. Idaho Power has indicated that they
20 agree to this level of mitigation.
21 For the Morgan Lake alternative, the draft
22 proposed order includes requirements for these same
23 H-frames between miles 5-7 of Morgan Lake as a
24 recommended condition. The City of La Grande would like
25 to express that as an alternative, the City would accept

Page 94

1 \$100,000 in funding for improvements to Morgan Lake to
2 mitigate the impacts on recreation should the Morgan
3 Lake alternative be constructed. Idaho Power has agreed
4 to this condition as well.
5 I want to say this again: Please do not
6 interpret the City's willingness to agree to
7 mitigations, that I just meant it as support or
8 acceptance of the project. We remain firmly opposed,
9 firmly opposed to the project for the reasons identified
10 in our 2017 comments of the preliminary application.
11 We respectfully ask that EFSC require the
12 mitigation we are seeking in the final order if the
13 project is approved. And while I have only a modicum of
14 the compassion as Peter Barry, just say no.
15 HEARING OFFICER WEBSTER: Next, we have
16 Mr. Larkin followed by Sheri Kanig.
17 MR. GREG LARKIN: Good evening. My name is
18 Greg Larkin. I reside at 59655 Morgan Lake Road. I
19 live on the top of Morgan Lake Road directly across from
20 the entrance into Morgan Lake.
21 The Morgan Lake alternative route of the Idaho
22 Power transmission line would be located approximately
23 120 yards from my residence. I'm in the process of
24 developing my second approved home site on this
25 property, which would be even in a closer location of

Page 95

1 this transmission line in proximity to it.
2 I spent many years as a locomotive engineer
3 for the Union Pacific Railroad. I suffered a permanent
4 disability of hearing loss and tinnitus that forced me
5 away from this career.
6 I can read you a screenshot from Wikipedia on
7 tinnitus: "Tinnitus is the hearing of sound with no
8 external sound present. While often described as a
9 ringing, it may also sound like a clicking, hiss or
10 roaring. Rarely, unclear voices or music are heard.
11 The sound may be soft or loud, low pitched or high
12 pitched and appear to be coming from one ear or both.
13 Most of the time, it comes on gradually. In some
14 people, the sound causes depression or anxiety and can
15 interfere with concentration."
16 I am real bad in the last 3 years. When I
17 left the railroad in '87, I had a testing in 1985, my
18 ears rang at that time 57 decibels. Approximately
19 10 years ago, one ear was at 72 decibels, the other one
20 was at 75 decibels.
21 Now, I have great concerns, and I've been
22 around the transmission lines before where I cannot
23 stand them, and if this is this close to my home. And
24 then to cope with it up there, or to tolerate it, I've
25 done a lot of pruning and thinning of the trees to get

Page 96

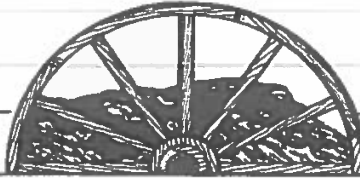
1 the wind patterns to different velocities of wind to
2 seek some relief from this, and I've been able to create
3 this type of environment here.
4 Now, the facts of this B2H coming through my
5 property, without it being there, can almost put a
6 person a little over the top that way. It affects me
7 every second of every day. It's a 100-pound drill
8 lodged in their back, to characterize it.
9 If this transmission line were to go through
10 at this location, I would no longer be able to reside or
11 fulfill my lifetime dreams and goal of living here. And
12 I don't have the time nor the resources or anything else
13 to seek the relief I've sought or the little bit of
14 tranquility to deal with this issue. Well, I will leave
15 it at this, and then I'll address some more issues.
16 As far as pertaining to the sound, the static
17 hiss of this line for the peace and tranquility of our
18 lake up there. We have a gas line that goes through,
19 this line and this route will cross this gas line twice.
20 If we have heavy fogs or a rainstorm, that can transmit
21 a spark to the ground and create a fire, the electronic
22 field.
23 Again, I'll repeat myself. The health hazards
24 of this to people in this close of proximity. And the
25 deterioration, even in the ground, the potential

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1 deterioration in the ground of this gas pipeline. The
2 technology, I don't know, as it goes over, through this
3 route. It had to. There is no longer a route that was
4 the western route that was on the radar and it's
5 disappeared, it's gone away. And viably the effect on
6 our county here, if that route were to go through in
7 that direction, it would most likely have no less impact
8 on our county here, to the residents.
9 I'm not a public speaker. I'll address it
10 further in some written comments. I'll have some
11 assistance on that.
12 I thank you for your time.
13 HEARING OFFICER WEBSTER: Thank you.
14 We have Sheri Kanig, and following we will
15 hear from William Whitaker.
16 MS. SHERI KANIG: Good afternoon or evening,
17 everyone. My name is Sheri Kanig, and I reside at 331
18 Southwest Street in Yreka, California. That is located
19 in the Klamath National Forest in Siskiyou County,
20 northern California. I am not a resident of La Grande
21 but a volunteer and a tourist.
22 I have been a co-owner of a large logging
23 company in the Klamath National Forest for many years
24 and also participated in fire suppression. I guess my
25 issues today are regarding the fire danger because of

20
140

10



CITY OF LA GRANDE

THE HUB OF NORTHEASTERN OREGON

OFFICE OF THE CITY MANAGER P.O. BOX 670 LA GRANDE, OREGON 97850 Phone (541) 962-1309 FAX (541) 963-3333

Halla
~~Good evening,~~ I am Steve Clements, Mayor of La Grande

Thank you for the opportunity to present this evening. The La Grande City Council, which represents the more than 13,000 residents who ^{live close} are in closest proximity to B2H, has provided ~~previous~~ ^{thru City Staff} comments at each step in the process. In the interest of time, I will be brief. *who will be negatively affected by B2H*

in 2017

opposed

The La Grande City Council, in partnership with the Union County Commissioners, conducted two public meetings to ~~listen to comments~~ ^{near from} from residents regarding this project as ~~part of the review~~ ^{in conjunction with} of the Amended Preliminary Application ~~in 2017~~. The public sentiment expressed at those meetings was overwhelming ~~in opposition to the Boardman to Hemingway Transmission Line~~. The basis for that opposition included, but was not limited to reduced property values to homes along the proposed route; view shed impacts throughout the area; environmental impacts both during construction and when the transmission line ~~is~~ becomes operational; impacts to recreational facilities such as Morgan Lake; and a lack of public notice and involvement throughout the process. ~~Of particular concern to the City Council was the decision by the applicant not to submit the BLM preferred route as the proposed route, or at the very least an alternative for consideration for Site Certification.~~

its and again this past April in a Proclamation *its*

The La Grande City Council has been clear in ~~the City's~~ ^{its} opposition to the project beginning with ~~our~~ first correspondence with ODOE in August of 2017. The City has also been consistent with ~~our~~ ^{its} request that EFSC ~~the Council~~ include mitigation to address the City's concerns if the project is ultimately approved. We very much appreciate the inclusion of staff recommended conditions related to transportation and the impacts to Morgan Lake in the Draft Proposed Order. We are hopeful that the transportation ~~related~~ conditions resolve the concerns raised by the City of La Grande and Union County throughout the process.

NEV

As we stated ~~previously~~ ^{have} to the Council, of the two routes identified in the application, the applicant selected Mill Creek, the one ~~most impactful~~ ^{EFSC} to the City of La Grande, ~~as their Proposed Route~~. We would ask first that ~~the Council~~ ^{EFSC} not approve the project, but if ~~the Council~~ ^{EFSC} does approve the project, we ask the ~~Council to remove the Proposed Route from the application and retain only the Morgan Lake Alternative.~~ ^{EFSC}

~~For the~~ ^{removed} If the Proposed Route is ~~not removed~~, we would ask that a condition be included to require H-frames with a tower height no greater than 130 feet, with weathered steel (or an equivalent coating) between Milepost 106/2 and Milepost 108/5. Idaho Power has indicated that they ~~would~~ agree to this level of mitigation.

~~For~~ In regard to the Morgan Lake Alternative, the Draft Proposed Order includes requirements for these same H-frames between miles 5-7 of the Morgan Lake alternative as a recommended condition. The City of La Grande would like to express that as an alternative, the City could accept \$100,000 in funding for improvements to Morgan Lake to mitigate the impacts on recreation should the Morgan Lake Alternative be constructed. Idaho Power has agreed to this as well.

Please do not interpret the City's willingness to agree to the mitigation I just mentioned as support for or acceptance of the project itself. We ~~still~~ ^{entirely} firmly oppose ~~the~~ ^{at} project for the reasons identified in ~~our~~ ^{the} 2017 review of the Preliminary Application ~~that I mentioned at the beginning of my remarks~~. We respectfully ask ~~the Council~~ to require the mitigation we are seeking in the final order if the project is approved.

EFSC

CITY OF LA GRANDE



The City of La Grande is pleased to present this report. The purpose of this report is to provide information to the City Council regarding the proposed route for the BMR. The City Council is requested to consider the proposed route and to make a decision regarding the same. The City Council is requested to consider the proposed route and to make a decision regarding the same. The City Council is requested to consider the proposed route and to make a decision regarding the same.

of the two routes identified in the application, the applicant has selected Mill Creek, the most impactful to La Grande, as the Proposed Route, and Morgan Lake as the Alternative. First and emphatically, the City opposes both those routes. And while I realize the BMR ~~Alternative~~ Preferred route is outside consideration, the City Council is very concerned about the decision by the applicant not to submit this route which had the ^{lower} ~~best~~ social & environmental impacts than the two identified routes

TARDAEWETHER Kellen * ODOE

From: Robert Strobe <RStrobe@cityoflagrande.org>
Sent: Thursday, August 22, 2019 1:53 PM
To: TARDAEWETHER Kellen * ODOE
Cc: Energy Siting * ODOE
Subject: B2H Draft Proposed Order Comments
Attachments: 20190822134939797.pdf

Kellen,

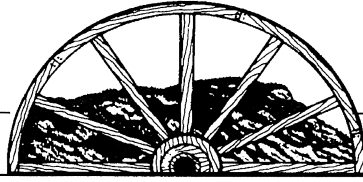
Attached is the City of La Grande's comments regrading the B2H project. We are mailing the original as well. Thank you for your consideration.

Robert

Robert A. Strobe, MPA
City Manager
City of La Grande
rstrobe@cityoflagrande.org
(541) 962-1309
(541) 963-3333 fax

CONFIDENTIALITY NOTICE: *This transmission is intended only for the use of the individual(s) named as recipients. It may contain information that is privileged, confidential and/or protected from disclosure under applicable law including, but not limited to, the attorney client privilege and/or work product doctrine. If you are not the intended recipient of this transmission, please notify the sender immediately by telephone. Do not deliver, distribute or copy this transmission, disclose its contents, or take any action in reliance on the information it contains.*

CITY OF



LA GRANDE

THE HUB OF NORTHEASTERN OREGON

OFFICE of the CITY MANAGER P.O. BOX 670 LA GRANDE, OREGON 97850 Phone (541) 962-1309 FAX (541) 963-3333

August 21, 2019

Energy Facilities Siting Council
Attention: Kellen Tardaewether
Oregon Department of Energy
550 Capitol St. N.E., 1st Floor
Salem, OR 97301

RE: City of La Grande Comments on the Draft Proposed Order for the Boardman to Hemingway Transmission Line

Dear Chair Beyeler and Members of the Council,

Thank you for this opportunity to provide comments on the Draft Proposed Order for the Boardman to Hemingway Transmission Line Project. The City of La Grande renews our objection to the project itself and would ask that the application be denied.

The City also renews the objection to the Proposed Route and requests Idaho Power remove the Proposed Route from their application and instead use the Morgan Lake Alternative **if the project is approved**. As we stated previously, of the two routes identified in the application, the applicant selected the one most impactful to the City of La Grande as the Proposed Route.

Given none of the proposed facilities are located within the City of La Grande's jurisdiction, our comments have been and continue to be limited in scope. Unless otherwise noted in this letter, we renew our previously stated concerns voiced in our past correspondence and Mayor Steve Clements' comments made on behalf of the City during the Public Hearing on June 20, 2019, in La Grande.

As stated in our last letter, the most significant element that concerns the City of La Grande is the potential impact to roads used to access the project. This concern remains and we appreciate the Recommended Public Services Condition 1 shown on page 496 of the Draft Proposed Order. We support requiring the submission of a more detailed Transportation and Traffic Plan and ask that this condition be included in the Proposed and Final Order if the project is approved. Doing so will allow Union County and the City of La Grande to fully evaluate and comment on the impacts that may occur on our roads prior to construction.

Regarding recreational impacts to Morgan Lake Park as discussed on pages 460 to 462 of the Draft Proposed Order, there are references to potential impacts during construction and the fact that a detailed Transportation and Traffic Plan will be provided prior to construction. The City cannot adequately address potential recreational impacts that may occur at the Park until this Plan is submitted and reviewed.

The City of La Grande and Idaho Power entered into the attached Memorandum of Agreement dated August 20, 2019, regarding mitigation related solely to viewshed impacts for both the Proposed Route and the Morgan Lake Alternative in the event the project is approved.

The Agreement requires Idaho Power to utilize H Frames in lieu of lattice structures between Milepost 106/2 and 108/5 if the Proposed Route is constructed to mitigate potential visual impacts.

The Agreement also requires Idaho Power to pay the City of La Grande \$100,000 for recreational improvements if the Morgan Lake Alternative is constructed. These will include improvements to the access road into Morgan Lake Park, the installation of new vault toilets at the campground, new entry gate system, day use improvements, signage, and other recreational enhancements throughout the Park. Based on this, the City is withholding existing or future recommendations that Idaho Power use H-frames near Morgan Lake Park.

Ideally, the City would prefer to have the provisions of the Agreement included in the Proposed and Final Order for the project as conditions, should the project receive approval.

Please feel free to contact me at the number above or via e-mail at rstrope@cityoflagrande.org if I can answer any questions regarding the City's position.

Sincerely,



Robert A. Strope
City Manager

*Memorandum of Agreement Regarding
B2H and the City of La Grande*

**MEMORANDUM OF AGREEMENT
REGARDING
THE BOARDMAN TO HEMINGWAY
TRANSMISSION LINE PROJECT
BY AND BETWEEN
IDAHO POWER COMPANY AND THE CITY OF LA GRANDE**

On this ^{20TH} day of August, 2019 (Effective Date), Idaho Power Company (Idaho Power), on behalf of the Boardman to Hemingway Transmission Line Project, and the City of La Grande, Oregon (La Grande) (individually, "Party" and collectively, "Parties") hereby enter into this Memorandum of Agreement Regarding the Boardman to Hemingway Transmission Line Project (MOA).

RECITALS

Energy Facility Siting Council Proceedings

WHEREAS, on or about October 3, 2018, Idaho Power submitted to the Oregon Department of Energy (ODOE) a final application for site certificate (Final Application) to construct the Boardman to Hemingway Transmission Line Project (B2H Project)—a 500-kilovolt transmission line extending approximately 300 miles from the proposed Longhorn Station in Boardman, Oregon to the existing Hemingway Substation in southwestern Idaho.

WHEREAS, on May 22, 2019, ODOE issued a Draft Proposed Order (DPO) on the Final Application, recommending approval of the B2H Project subject to the conditions listed in the DPO.

Union County Impacts

WHEREAS, the DPO includes two alternative routes through Union County: (1) the Proposed Route (also referred to as the Mill Creek Alternative); and (2) the Morgan Lake Alternative.

WHEREAS, for the Proposed Route, the DPO includes no mitigation for potential visual impacts to the La Grande viewshed.

WHEREAS, for the Morgan Lake Alternative, the DPO includes the following mitigation for potential visual impacts to the recreational opportunities at Morgan Lake Park:

Recommended Recreation Condition 1: If the Morgan Lake alternative facility route is selected, the certificate holder shall construct the facility using tower structures that meet the following criteria for the transmission line that would be visible from Morgan Lake Park, specifically between miles 5-7 of the Morgan Lake alternative, as shown on ASC Exhibit C, Attachment C-3, Map 8.

*Memorandum of Agreement Regarding
B2H and the City of La Grande*

- a. H-frames;
- b. Tower height no greater than 130 feet; and
- c. Weathered steel (or an equivalent coating).

The Parties' Responses to the DPO

WHEREAS, La Grande believes that no portion of the B2H Project should be sited within Union County. However, to address the possibility that the Energy Facility Siting Council approves the B2H Project despite La Grande's objections, La Grande has raised certain concerns about the Proposed Route's potential visual impacts, and about the Morgan Lake Alternative's potential impacts on Morgan Lake Park.

WHEREAS, the Parties agree that both Parties will benefit if, to minimize the Proposed Route's potential visual impacts, the Proposed Route includes H-frame structures—instead of lattice towers—within the viewshed of La Grande.

WHEREAS, the Parties agree that both Parties will benefit if, to mitigate the Morgan Lake Alternative's potential impacts to Morgan Lake Park, the Morgan Lake Alternative provides for recreational improvements at the park instead of H-frame structures.

NOW, THEREFORE, the Parties agree as follows:

AGREEMENT

1. Proposed Route's Potential Visual Impacts

a. To address the Proposed Route's potential visual impacts within the La Grande viewshed, if the Proposed Route is constructed, Idaho Power shall utilize H-frame structures, in lieu of lattice structures, specifically between Milepost 106/2 and Milepost 108/5.

2. Morgan Lake Alternative's Potential Impacts to Morgan Lake Park

a. To address the Morgan Lake Alternative's potential impacts to Morgan Lake Park, if the Morgan Lake Alternative is constructed, Idaho Power shall make payment to La Grande in the amount of one-hundred thousand dollars (\$100,000) for recreational improvements to Morgan Lake Park.

- i. Idaho Power shall make the payment at the start of construction of the B2H Project, and only if the Morgan Lake Alternative is constructed.
- ii. The payment set forth in Section 2.a of this MOA is intended to primarily fund recreational improvements at Morgan Lake Park.

b. Idaho Power may request that the mitigation in Section 2.a is included in, or referenced in, the Site Certificate conditions. If Idaho Power chooses not to do so, Idaho Power nonetheless shall make the payment as set forth in Section 2.a.

*Memorandum of Agreement Regarding
B2H and the City of La Grande*

c. La Grande shall withhold any existing, or future, recommendation that Idaho Power use H-frames near Morgan Lake Park.

3. Binding Effect and Assignment. This MOA shall be binding upon, and shall be enforceable by and inure to the benefit of, the Parties and their respective successors and assigns.

4. Term and Termination. This MOA shall become effective and remain in effect from the Effective Date until termination of the agreement. This MOA shall terminate the earliest of when: (i) Idaho Power (or its successor or assign) withdraws the application for site certificate; (ii) construction of the B2H Project is completed; or (iii) the site certificate is terminated.

5. Effect of Termination. Upon termination of this MOA in its entirety pursuant to Section 4, all obligations of the Parties will terminate.

6. Severability. If any term or other provision of this MOA is held to be invalid, illegal or incapable of being enforced by any rule of law, or public policy, such term or provision shall remain in full force and effect to the extent not held invalid or unenforceable, and all other conditions and provisions of this Agreement shall nevertheless remain in full force and effect. Upon such determination that any term or other provision is invalid, illegal or incapable of being enforced, the Parties shall negotiate in good faith to modify this MOA so as to effect the original intent of the Parties as closely as possible in a mutually acceptable manner in order that the transactions contemplated hereby be consummated as originally contemplated to the fullest extent possible.

Idaho Power Company, on behalf of the B2H Project

Signature: 

Printed Name: Vern Porter

Title: Vice-President, T&D Engineering and Construction

Date: AUGUST 19, 2019

City of La Grande

Signature: 

Printed Name: Robert Strobe, MPA

Title: La Grande City Manager

Date: August 20, 2019

TARDAEWETHER Kellen * ODOE

From: BREUNER Nancy <Nancy.Breuner@state.or.us>
Sent: Monday, July 22, 2019 5:31 PM
To: B2H DPOComments * ODOE
Cc: TARDAEWETHER Kellen * ODOE
Subject: ODEQ B2H comments
Attachments: B2H ASC from ODEQ 07.22.19.docx

Hello Kellen,

Attached are DEQ's comments regarding the Draft Proposed Order for the Boardman to Hemingway Transmission Line.

Regards, Nancy

DEQ Regional Solutions Liaison
Northeast/Greater Eastern Regions
Oregon Department of Environmental Quality
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
Desk: (541) 633-2001
Cell: (541) 969-6749
breuner.nancy@deq.state.or.us

MEMORDUM

To: Kellen Tardaewether, Senior Site Facilities Analyst
Oregon Department of Energy

From: Nancy Breuner, Regional Solutions Liaison
ODEQ, Eastern Region
475 NE Bellevue Dr., Suite 110
(541) 633-2001
Breuner.nancy@deq.state.or.us

Date: July 22, 2019

RE: ODEQ Comments on the Draft Proposed Order for the Boardman to Hemingway Transmission Line

General Comments:

I have reviewed the Draft Proposed Order (DPO) for the Boardman to Hemingway Transmission Line and am responding to ODOE's Request for Public Comments dated May 22, 2019. My review is to confirm that the DPO adequately discusses, mentions, addresses and incorporates statutory reference to probable ODEQ permitting needs and regulations, as listed in the attached Table in ODEQ's previous comments, dated November 21, 2018.

Specific Comments:

The following environmental regulatory concerns need to be addressed in this DPO: Section 401 permitting, post-construction stormwater management plan, possible wastewater permit, unintentional return of drilling fluids at stream crossings during any Horizontal Directional drilling operations; construction-related fugitive dust and combustion emissions, especially in La Grande's Maintenance Area for PM10; and, soil disturbance that might contain asbestos.

Thank you for the opportunity to comment on this proposal.

Regards, Nancy Breuner,

Regional Solutions Liaison
ODEQ, Eastern Region

TARDAEWETHER Kellen * ODOE

From: Sarah J Reif <Sarah.J.Reif@state.or.us>
Sent: Thursday, August 22, 2019 1:59 PM
To: TARDAEWETHER Kellen * ODOE
Subject: B2H Draft Proposed Order - ODFW Comment
Attachments: B2H DPO_ODFW Comments_08.22.19.pdf

Kellen,

Attached you will find ODFW's review and comment on the B2H Draft Proposed Order. Let me know if you have any questions or require additional information.

Sarah Reif
Energy Coordinator, Wildlife Division
Oregon Dept of Fish & Wildlife
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Oregon

Kate Brown., Governor

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August 22, 2019



Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E., 1st Floor
Salem, OR 97301

RE: Boardman to Hemingway Transmission Line Draft Proposed Order

Dear Ms. Tardaewether,

The Oregon Department of Fish and Wildlife (ODFW) has reviewed the Draft Proposed Order (issued May 2019) for the Boardman to Hemingway (B2H) Transmission Line Project, which was submitted to the Energy Facility Siting Council (EFSC) as an Application for Site Certificate in 2018. It is the policy of the State of Oregon that wildlife shall be managed to prevent serious depletion of any indigenous species and to provide optimum recreational and aesthetic benefits for present and future generations of the citizens of this state. In furtherance of this policy, ODFW reviewed the B2H Draft Proposed Order for its consistency with ODFW applicable statutes and rules and its demonstration of effort to avoid, minimize, and mitigate the project's impacts to fish and wildlife and their habitats.

ODFW has appreciated the high level of coordination with Idaho Power Company (IPC) and Oregon Department of Energy (ODOE) on this project since its inception; coordination that was facilitated by the B2H Coordinator position formerly housed in the ODFW field office in La Grande. In general, ODFW found the conditions of the Draft Proposed Order to have addressed many of ODFW's prior concerns and recommendations provided during the Notice of Intent and Application for Site Certificate review phases. Remaining comments and recommendations are provided below.

As stated in our comment letter on the Application for Site Certificate, many of the fish and wildlife conditions in the Draft Proposed Order are provisional at this time, subject to ODOE and ODFW review prior to construction. ODFW understands the need for provisional plans on a project of this scale, and that final surveys, impact assessments, avoidance and minimization measures, and mitigation plans cannot be finalized until the Right-of-Way (ROW) location can be finalized and access obtained. Given the provisional nature of the current ASC, comments and recommendations made by ODFW herein are

subject to change based on the results of final surveys and final plans. Furthermore, ODFW anticipates significant workload for the agency in the pre-construction phase to review finalized plans. ODFW would appreciate a coordinated and sequenced schedule that offers adequate time for review prior to IPC's desired construction start date.

ODFW focused its review on the conditions listed in the Draft Proposed Order. Comments and recommendations are provided in the following table.

Condition Number	ODFW Comment
Fish and Wildlife Condition 1	<p>Revegetation and reclamation serve an important function in minimizing impacts to wildlife habitat. Some habitats that will be impacted by this project, namely sagebrush shrubland and forests, take upwards of 10 to 50 years to recover their pre-disturbance form and function. IPC has offered a robust revegetation plan, however ODFW stands by its previous recommendation that reclamation/revegetation monitoring be performed for longer than 5 years post-construction. ODFW recommends IPC utilize an adaptive monitoring schedule and management plan that can address Project impacts as long as necessary to achieve success criteria.</p> <p>ODFW also finds IPC's proposed reclamation success standards (Table 6) to be low relative to what ODFW has recommended and supported for other projects in similar habitats. Below are the recommendations ODFW made to ODOE for the B2H Notice of Intent and Application for Site Certificate, which we believe are still appropriate:</p> <p>[ODFW recommends the following criteria for reclamation success be included in the Reclamation and Revegetation Plan]:</p> <ol style="list-style-type: none"> 1. Maintain percent foliar cover of weed species within reclamation sites at a level equal to or less-than the paired control site. This will reduce the risk of invasive weeds outcompeting favorable vegetation and creating a source population for dispersing weed species. 2. Reclamation actions should prioritize establishment of native perennial bunchgrasses. Native, perennial bunchgrasses are our best defense against fire-prone annual grasses that threaten the arid habitats crossed by this project. Maintain $\geq 70\%$ percent foliar cover of native perennial bunchgrasses of the paired control site. The remaining percentage of vegetation can be other

	<p>desirable vegetation species not present at the control site or functional bare ground.</p> <ol style="list-style-type: none">3. Reclamation actions in forested and shrub habitats should have appropriate woody species in the plant mix. Woody species should be plugged using appropriate aged plants to ensure the greatest possible revegetation success. Successful revegetation of sagebrush habitats should have at least 15 percent sagebrush foliar cover.4. Maturity of vegetation within paired control sites should be used to determine the reclamation monitoring timeframe. Monitoring should be conducted on a regular 1-2 year interval until vegetation is established in a similar species composition as the paired control site. Monitoring efforts should then be extended to every 5-10 years (depending on habitat vegetation) until the vegetation reaches the same maturity as the paired control site when the Project impact occurred. <p>The success criteria in Table 6 are particularly deficient for sage-grouse core, low density, and general habitat. The success criteria outline in Table 6 for shrublands is to achieve 50% of the desirable vegetative cover. Restoration of sagebrush habitat should be based on habitat structure, vegetative cover, and amount of annual invasive, which the 50% value does not address nor accomplish. Below are the success criteria ODFW would recommend ODOE use as the standards for restoring sagebrush habitat for the B2H project.</p> <ol style="list-style-type: none">a. Reclamation actions shall achieve an average bunch grass density greater than or equal to 5 mature plants per square meter across the reclamation site.<ul style="list-style-type: none">• A native seed mix shall be utilized during initial seedings. If native species establishment is not successful after a several consecutive seeding efforts, a mixed native/non-native seed mix may be consider during subsequent seeding. Consult ODFW for recommended site specific seed mixes.
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	<p>a. Sagebrush shall be planted within project reclamation areas to adequately replace habitat function and structure.</p> <ul style="list-style-type: none"> • For best results, ODFW requests that the project proponent plant sagebrush plants or drill sagebrush seed. Sagebrush planting should achieve approximately 15% foliar cover of the reclamation site to ensure functional habitat for both sage-grouse and other sagebrush obligate species. This may many year to achieve. <p>b. Invasive weeds shall be treated in all reclamation sites. Treatment of invasive weeds for purposes of reclamation shall be based in-part on pre-project vegetation surveys or appropriately selected control sites.</p> <ul style="list-style-type: none"> • If invasive/noxious annual grasses are determined to be largely absent within the pre-project vegetation survey area, the project proponent shall maintain the percent foliar cover of annual grass species in reclamation areas at less than 10%. • If invasive/noxious annual grasses are determine to be present in pre-project vegetation survey areas, the project proponent shall maintain percent foliar cover of weed species within reclamation areas at a level equal to or less than pre-project conditions. • Intensive weed treatment actions shall be maintained until both the bunch grass density and sagebrush foliar cover success criteria are achieved. Weed treatment can become more generalized once success criteria are met. • All weed treatments shall be conducted with the intent to fully eliminate non-native invasive weed species.
Fish and Wildlife Condition 3	Linear projects such as transmission lines and pipelines, often inadvertently spread noxious weeds across the landscape. This

	<p>is perhaps the greatest risk of this project to Oregon’s wildlife habitats. For this reason, ODFW believes noxious weed monitoring and control is an extremely important minimization measure (per OAR 635-415). Long-term monitoring and successful treatment of noxious weeds are important to the success of habitat restoration efforts. ODFW recommends that IPC monitor and control invasive weeds beyond the initial 5-year treatment period on a regular schedule determined collaboratively with ODOE and ODFW.</p>
<p>Fish and Wildlife Condition 10</p>	<p>ODFW appreciates the condition to construct the transmission line to avian-safe design standards and views this as a key avoidance and minimization measure for migratory birds. Upon further analysis, and in response to public comment, ODFW offers the following additional recommendations to further minimize potential impacts to migratory flyways in the vicinity of the Ladd Marsh Wildlife Area.</p> <p>In particular, ODFW is currently focused on the importance of this area for sandhill cranes which are a species of growing conservation concern given their declining populations throughout their range, and the significant mortality rates caused by transmission lines elsewhere in the United States (see Murphy et al. 2016, link provided below).</p> <p>Through our own radio telemetry tracking efforts of sandhill cranes (data available upon request), ODFW has documented a migratory pathway that includes much of Baker and Union Counties, Ladd Marsh Wildlife Area, and the Grand Ronde Valley. Sandhill cranes move across the proposed B2H route, typically coming from the southeast, every spring and fall as well as during the summer nesting season. Wildlife Area biologists have documented groups of 700+ sandhill cranes using the Ladd Marsh Wildlife Area and Grand Ronde Valley during migration, likely part of a population that winters in California’s Central Valley.</p> <p>ODFW believes a new transmission line of the size proposed for the B2H project poses an increased risk to this migratory population of sandhill cranes. ODFW recommends IPC use enhanced bird flight diversion technology such as the new UV light technology [in a spectrum not visible to most humans but visible to the birds] similar to that featured in this article https://www.tdworld.com/overhead-transmission/bird-line-</p>

	<p>collision; or such as that discussed in Murphy et al. 2016 (https://fwspubs.org/doi/pdf/10.3996/052016-JFWM-037). In both of the referenced experiments, inclusion of these flight diverters resulted in a reduction of sandhill crane collisions and an increased detectability of the lines during their nocturnal migration.</p> <p>ODFW recommends enhanced bird flight diverter measures be employed at a minimum within the Grand Ronde Valley, particularly if the selected route will cross the Ladd Marsh Wildlife Area. But to most effectively avoid impacts to the sandhill crane population, the measures should extend from central Baker County to the Umatilla County line. ODFW would be happy to discuss these recommendations further with ODOE and IPC.</p>
Fish and Wildlife Condition 17	<p>This section of the Draft Proposed Order appears inconsistent with the way ODFW anticipates assessing project impacts to sage-grouse habitat and ODFW recommends updating to reflect the following information.</p> <p>To clarify, when conducting the initial project impact assessment, ODFW will request mitigation for all applicable temporary and permanent direct project impacts and transmission line tower indirect impacts. In addition, ODFW assumes that any new project roads within sage-grouse habitat not equipped with access control structures will result in indirect impacts to sage-grouse and will request appropriate mitigation (lowest level of indirect impact) for those roads with the initial request for mitigation prior to construction. Upon completion of the traffic study in year-3 of operation, ODFW will request additional mitigation as appropriate for improve existing roads or any identified increase in assumed traffic volume on new project roads.</p> <p>ODFW has additional requirements as identified in the Greater Sage-grouse Habitat Mitigation Program Operations and Administration Manual (Mitigation Manual) that should be discussed in the mitigation plan for permittee-responsible mitigation. These additional components to the mitigation plan help provide assurances that the mitigation will be conducted appropriately and remain durable through the life of the development impact to sage-grouse. ODFW suggests the following elements be included to the mitigation plan list under</p>

	<p>bullet number 3 on page 316 lines 31-39; 1. Description of the HQT results for specific mitigation site(s) and actions, 2. Description of how the durability of mitigation sites is to be achieved, 3. Provide performance measures and success criteria for mitigation actions, 4. Adaptive management considerations for changes in habitat conditions or a result of catastrophic fire, 5. Weed management plan, 6. Long term stewardship plan, and 7. Financial assurances plan/document.</p> <p>As outlined in the mitigation hierarchy in OAR 660-023-0115, compensatory mitigation for large scale development impacts to sage-grouse habitat must comply with ODFW's Sage-grouse Mitigation Policy (OAR chapter 635 division 140) which is interpreted through the principles and standards in the Mitigation Manual and assessment of project impacts through ODFW's Habitat Quantification Tool. Therefore, if the project proponent utilizes a mitigation bank, that mitigation bank will have to be approve by ODFW to ensure the mitigation is consistent with sage-grouse policy and mitigation program requirements. To capture the above considerations, ODFW requests that the following information be inserted prior to number 2 under section ii. <i>The project proponent may only use a mitigation bank or in-lieu fee program that is approved by ODFW to fulfill sage-grouse mitigation requirements.</i></p>
Fish and Wildlife Condition 18	<p>Condition 18 is written so that mitigation could be postponed until later stages of project construction, potentially resulting in a loss of sage-grouse habitat between the initial construction impact and commencement of mitigation actions. The potential loss of habitat over entire project construction time period is a concern for ODFW and is inconsistent with the sage-grouse mitigation program. ODFW requests including the following clarifying language to reduce potential time lags between construction impacts and initiation of mitigation actions. F&W Condition 18: During construction, the certificate holder shall implement the conservation actions set forth in the final Sage-Grouse Habitat Mitigation Plan referenced in Fish and Wildlife Condition 17 <i>within six months of the impact actions.</i></p>
Threatened and Endangered Species Condition 1	<p>In part (c) of this condition, there is discussion of what to do if WAGS colonies are encountered in non-Category 1 habitat. To clarify, any occupied WAGS colony would be considered</p>

	Category 1 habitat by ODFW and would be subject to our avoidance recommendations.
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ODFW appreciates the opportunity to review and comment on the Draft Proposed Order for the B2H Transmission Line project. If ODOE or the applicant has any questions regarding the comments herein, or seeks additional information, please do not hesitate to reach me at 503-947-6082 or sarah.j.reif@state.or.us. Thank you.

Sincerely,



Sarah Reif
Energy Coordinator

TARDAEWETHER Kellen * ODOE

From: DAVIS Thomas J *Tom <Thomas.J.DAVIS@odot.state.or.us>
Sent: Tuesday, July 23, 2019 1:05 PM
To: TARDAEWETHER Kellen * ODOE; B2H DPOComments * ODOE
Cc: HIKARI Sandra Y; ANDERSON Stephanie; PATTERSON Kenneth E; SIPP Craig A; WRIGHT Michelle F; BILLINGS Scott D; PENNINGER Teresa B; FROST Russell G; BERRY Jeff; WOODWORTH Paul D; CLARK Ace W; HOWLAND Paul L; HOLT Marilyn M; HAYES Lisa M; DETHLOFF William D
Subject: RE: Public Notice on the Public Hearings and Comment Period for the Boardman to Hemingway Transmission Line Draft Proposed Order
Attachments: DPO_Comments_Attachments_20190723.pdf

Attached is the Oregon Department of Transportation, Region 5 comments as outline in the Public Notice issued May 22, 2019 accepting comments until today at 5:00 p.m. (PDT). We would like to have our comments to be included to the Draft Proposed Order.

Should you have any questions, please feel free to give me a call or email.

Thank you.
Tom Davis

*Tom Davis, ODOT
District 14 Operations Coordinator
1390 SE 1st Avenue
Ontario, Or 97914
(541) 823-4017
Cell (541) 216-3896
Fax (541) 889-6600*

From: TARDAEWETHER Kellen * ODOE <Kellen.Tardaewether@oregon.gov>
Sent: Wednesday, May 22, 2019 2:18 PM
To: hkerns@bakercounty.org; Eric.Evans@malheurco.org; cmclane@co.morrow.or.us; robert.waldher@umatillacounty.net; shartell@union-county.org; huntingtoncityof@gmail.com; hun1891@netscape.net; cityofnp@eoni.com; cityofadrian@hotmail.com; kpettigrew@cityofboardman.com; ecpl@centurytel.net; karen@islandcityhall.com; rstrope@cityoflagrande.org.; cityadmin@cityofcove.org; tamra@umatilla-city.org; bob@umatilla.org; town055@centurytel.net; teri.bacus@cityofpilotrock.org; citymanager@cityofstanfield.com; admin@cityofunion.com; rnudd@bakercity.com; bsmith@hermiston.or.us; manager@ci.irrigon.or.us; mayor@cityofvale.com; klamb@cityofvale.com; haines@cascadeaccess.com; BLEAKNEY Leann <lbleakney@nwcouncil.org>; CANE Jason <jason.cane@state.or.us>; MILLS David <david.mills@state.or.us>; JOHNSON Jim * ODA <jjohnson@oda.state.or.us>; CAINES Jeff <Jeff.CAINES@aviation.state.or.us>; svelund.greg@deq.state.or.us; nigg.eric@deq.state.or.us; SEIDEL Nigel E <Nigel.E.Seidel@state.or.us>; MYATT Nick A <Nick.A.Myatt@state.or.us>; REIF Sarah J <Sarah.J.Reif@state.or.us>; TOKARCZYK John A * ODF <John.A.TOKARCZYK@oregon.gov>; WANG Yumei * DGMI <Yumei.WANG@oregon.gov>; EDELMAN Scott <scott.edelman@state.or.us>; JININGS Jon <jon.jinings@state.or.us>; MURPHY Tim <timothy.murphy@state.or.us>; BROWN Lauren <Lauren.BROWN@state.or.us>; CARY Dan <dan.cary@state.or.us>; DAVIS Thomas J *Tom <Thomas.J.DAVIS@odot.state.or.us>; BEALS Alice * OPRD <Alice.Beals@oregon.gov>; MULDOON Matt <matt.muldoon@state.or.us>; LGKOHO@puc.state.or.us; POULEY John * OPRD <John.Pouley@oregon.gov>; JOHNSON

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Subject: Public Notice on the Public Hearings and Comment Period for the Boardman to Hemingway Transmission Line Draft Proposed Order

Good afternoon,

I'm forwarding the GovDelivery announcement that just was issued for the proposed Boardman to Hemingway Transmission Line draft proposed order (DPO) on the application for site certificate (ASC). The DPO and ASC can be viewed and downloaded on the [project webpage](#). The attached Notice of the DPO has additional information about the comment period and upcoming public hearings. It has been mailed to the individuals on the mailing lists and was published in several newspapers within the vicinity of the proposed facility.

I'd like to thank all of you for your time and efforts providing your feedback during the review of this facility. Let me know what questions you have!

Kellen

Kellen Tardaewether
Senior Siting Analyst
Energy Facility Siting Division
Oregon Department of Energy
550 Capitol St N.E., 1st Floor
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Leading Oregon to a safe, clean, and sustainable energy future.



Public Notice on the Public Hearings and Comment Period for the Boardman to Hemingway Transmission Line Draft Proposed Order

Description:

Idaho Power Company (applicant) submitted to the Oregon Department of Energy (Department) an application for site certificate (ASC) for the proposed Boardman to Hemingway Transmission Line. The Department serves as staff to the

Energy Facility Siting Council (EFSC). The proposed Boardman to Hemingway Transmission Line would be a 500 kilovolt, high-voltage electric transmission line. The proposed facility would cross five counties in Oregon: Morrow, Umatilla, Union, Baker, and Malheur.

The Department issued a draft proposed order (DPO) on the application on May 22, 2019. The DPO recommends EFSC approve the application and grant a site certificate, subject to the conditions of approval listed in the DPO.

Public Hearings and Public Comment Period:

EFSC will hold a public hearing on the draft proposed order in each of the counties the proposed facility crosses. Each hearing will begin at 4:30 p.m. and will include a brief introduction by ODOE staff and directions from an independent hearing officer, appointed by EFSC. The dates, times, and locations are included in the Public Notice of the DPO and also provided below.

Draft Proposed Order Public Hearings			
County	Date	Time	Address
Malheur	Tuesday, June 18, 2019	4:30 – 8 p.m.	Four Rivers Cultural Center, 676 SW 5th Ave, Ontario, OR 97914
Baker	Wednesday, June 19, 2019	4:30 – 8 p.m.	Baker City Veterans of Foreign Wars Hall, 2005 Valley Ave, Baker City, OR 97814
Union	Thursday, June 20, 2019	4:30 – 8 p.m.	Blue Mountain Conference Center, 404 12th St, La Grande, OR 97850
Umatilla	Wednesday, June 26, 2019	4:30 – 8 p.m.	Pendleton Convention Center, 1601 Westgate, Pendleton, OR 97801
Morrow	Thursday, June 27, 2019	4:30 – 8 p.m.	Port of Morrow, Riverfront Room, 2 Marine Dr NE, Boardman, OR 97818

Written comments to be included in the record of the public hearings must be received by the Department **no later than July 23, 2019 at 5 pm (PDT)**. Written comments may be submitted prior to, during, and after the public hearings by mail, email, hand-delivery or fax to the hearing officer, in care of:

Kellen Tardaewether, Senior Siting Analyst
 Oregon Department of Energy
 Phone: 503-373-0214
 Address: 550 Capitol St N.E.
 Salem, OR 97301
 Fax: 503-378-6457
 Email: B2H.DPOComments@Oregon.gov

Additional Information:

You received this notice either because you previously signed up for email updates through GovDelivery related to specific siting projects, all Energy Facility Siting Council activities (the "General List"). You will automatically receive all future notices on this facility. You will automatically receive all future notices per your request or GovDelivery choices, unless you unsubscribe via GovDelivery or by contacting the Department.

If you have any questions or comments about GovDelivery please feel free to contact the Department's Division Assistant Esther Kooistra at esther.kooistra@oregon.gov



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For questions about the content of this message, please contact us at AskEnergy@Oregon.gov.

This service is provided to you by the [Oregon Department of Energy](#).

This email was sent to kellen.tardaewether@oregon.gov using GovDelivery Communications Cloud on behalf of the Oregon Department of Energy · 550 Capitol St. NE, 1st Floor · Salem, OR 97301-3742 · 503-378-4040





Oregon

Kate Brown, Governor

Department of Transportation

District 14

1390 SE 1st Avenue

Ontario, OR, 97914-2945

Phone: (541) 823-4017

Fax: (541) 889-6600

Email: thomas.j.davis@odot.state.or.us

TO: Kellen Tardaewether
Oregon Department of Energy
550 Capitol St N.E., 1st Floor
Salem, OR 97301

FROM: Tom Davis, District 14 Operations Coordinator
Oregon Department of Transportation
1390 SE 1st Avenue
Ontario, OR 97914
(541) 823-4017
thomas.j.davis@odot.state.or.us

DATE: July 23, 2019

RE: Oregon Department of Transportation Comments for the Boardman to Hemingway Transmission
Line Draft Proposed Order Comments

Kellen: this letter is Oregon Department of Transportation comments on the Draft Proposed Order for the Boardman to Hemingway project. The notice dated May 22, 2019 allows for comments through July 23, 2019. These comments are based on ODOT's and Idaho Power previous correspondences.

ODOT has submitted several correspondence since 2012 addressing ODOT's concerns with the B2H project. ODOT submitted comments during the Site Certification comment period which closed on November 26, 2018. A letter dated December 21, 2018 was submitted as a follow up to those comments submitted during the Site Certification comment period. This follow-up letter was included as Attachment 3 under Draft Proposed Order dated 5/22/2019.

Idaho Power, ODOE and ODOT did continue working through ODOT's concerns. On March 20, 2019 a letter (see attached) was sent to ODOE on the continued work between Idaho Power and ODOT.

Quarries

On March 8, 2019 Idaho Power submitted to ODOT alternative routes (see attached) involving each of the impacted quarries. These quarries do have a value to ODOT. These alternatives submitted by Idaho Power had not at that time been presented to the impacted property owners or to ODOE. Two of these alternatives will still have a direct impact to ODOT. ODOT will lose production at these quarries which will require future sites to be developed. These alternative routes were developed based on previous communications between ODOT and Idaho Power to provide the least amount of impact.

Idaho Power will need to work with the impacted property owners on the three realignment alternatives. If the property owners are in agreement with these proposals, Idaho Power will include these through an amendment process through ODOE. Should any of these alternatives not move forward, Idaho Power shall reengage ODOT to work towards an agreeable solution.

Other items dealing with quarries that ODOT and Idaho Power has agreed to work together on:

- Roads and access to or through ODOT quarries.
- Easement form; ODOT & Idaho Power both have Easement forms that are normally used. Both will work together in developing language for the Easement Agreement.

Scenic Byways

In our March 20, 2019 letter to ODOE, ODOT recommended that the proposed Boardman to Hemingway transmission line project avoid all impacts to the intrinsic values including scenic, historic, recreational, cultural, archeological, and natural resources to five Scenic Byways - Hells Canyon Scenic Byway All-American Road, the Journey Through Time, Blue Mountain and Elkhorn Drive State Scenic Byways and the Grande Tour Scenic Route.

In response, Idaho Power revised Exhibit R of the Application Site Certification to add the Grande Tour Scenic Route to the discussion of State Scenic Byways and to better describe the location of all the scenic byways in relation to the Project. Based on our review, there are a number of items in the Exhibit R Errata document that received a lower score than ODOT would propose.

Hells Canyon Scenic Byway All-American Road

For example, we disagree with Idaho Power's scoring of Viewer Perception in B2H Exhibit R Errata Sheets table R-2 on page 6 and under Section 3.3.2.10 Visual Impact Assessment on page 9. Considering the transmission line crosses the Hells Canyon Scenic Byway, views of the Project are predominately head on. Since this would put the transmission line in the foreground (up to 0.5 miles), we would say that the impact is Medium instead of Low. Although views of the project will be episodic, Idaho Power assumes a vehicular travelling speed of 45 miles per hour. Their assessment does not take into account cycle tourism along Scenic Byways where the average travel speed is around 15 mph. OR 86 in particular attracts a significant number of riders through this area as it is on the Adventure Cycling Tour Route (from Baker City to Missoula) and the TransAmerica Bike Route (from Astoria, Oregon to Youngstown, Virginia).

We also disagree with Idaho Power's Significance Determination –on table R-2 on page 6 and under Significance Determination on page 9. Hells Canyon Scenic Byway is a National Scenic Byway recognized by the US Department of Transportation. The most-scenic byways are designated All - American Roads. Designation means that they have features that do not exist elsewhere in the United States. Hells Canyon Scenic Byway was designated as an All – American Road in 2000 and shares this distinction in Oregon with the Historic Columbia River Highway and the Pacific Coast Scenic Byway. The Hell's Canyon Scenic Byway Corridor Management Plan identifies a strategy for maintaining and enhancing the six intrinsic values noted above. Scenic quality of this portion of the Hell's Canyon Scenic Byway is unique and encompasses the historic significance associated with the physical elements of the landscape that the pioneers endured on the Oregon Trail. Since the proposed route crosses OR 86 in the vicinity of the National Historic Oregon Trail Interpretive Center, we would say that visual impacts to the Hells Canyon Scenic Byway are *Potentially Significant*.

Grande Tour Scenic Route

On page 10 of the B2H Exhibit R Errata Sheets Idaho Power describes the *Project Location* in relation to the Grande Tour Scenic Route. *The Proposed Route passes within 0.2 miles of the western most portion of the Grande Tour Route along Foothill Road near Ladd Marsh WMA about 5 miles south of La Grande in Union County (Attachment R-3, Figure R-3-3).* The Project would put the transmission line in the immediate foreground distance zone (up to 0.5 miles) that is ranked as High. As such ODOT disagrees with Idaho Power's Viewer Perception assessment on table R-2 on page 6 & Magnitude of Impact table on page 17.

Again, Idaho Power does not take into account bicycle or pedestrian travel along the scenic route. The close proximity of the Grande Tour Scenic Route to the City of La Grande attracts people of all ages to walk, run and bike for outdoor recreation, to access wildlife area lands east of Foothill Road to view Sandhill cranes and other migratory birds and west of Foothill Road to hike the trails on Glass Hill. For these reasons, we would say that the Viewer Perception is High instead of Low.

ODOT also disagrees with the *Mitigation Considered*, under Section 3.3.2.10 on page 10, for the Grande Tour Route along Foothill Road. Idaho Power's view shed analysis indicates that the Morgan Lake Route is not visible from any portion of the byway (Attachment R-6). ODOT specifically states in our letter of March 20, 2019 with regards to the Grande Tour Scenic Byway that "Preferred mitigation would be the alternative alignment (Morgan Lake Alternative) in order to keep transmission lines further away from the scenic byway to avoid impacts to intrinsic qualities."

Regarding the Magnitude of Impact tables on page 16 & 17 – the increase in size of the structure (60-70 feet taller than existing structures) would be a High Impact. The landscape is open so the contrast to a tall transmission structure is High. Also, in locations where they will be cutting through vegetation and making openings, as seen in former renderings, will make the transmission structures very noticeable and will significantly lower the value of the scenic quality of the Grande Tour Scenic Route that is intended to showcase outstanding scenery and preserve and maintain the area's history. In our opinion, Resource Change would also be High, as the Project will appear to dominate the view.

ODOT further disagrees with Idaho Power's Significance Determination – table R-2 on page 6 & the determination on page 18. The Grande Tour Scenic Route is a designated Oregon Tour Route by the Oregon Department of Transportation that represents scenic views and sites of statewide significance. Ladd Marsh Wildlife Management Area is one of four areas of scenic quality identified in the Grande Tour Management Plan. The Ladd Marsh wildlife area to the west of Foothill Road, locally known as Glass Hill winter range, is prime elk habitat that the Project will cross. The wildlife area to the east of Foothill Road includes the Foothill Road Viewpoint where the Project is within close proximity. Foothill Road itself is part of the Oregon Trail, National Historic Trail Route. Based on our analysis the degree to which impacts are caused by the Project are *Potentially Significant*. ODOT's recommended mitigation would be an alternative alignment to avoid all impacts to the intrinsic values of the Grande Tour Scenic Route.

Conclusion

These comments have been documented throughout ODOE planning and permitting process. In working with Idaho Power, ODOT's concerns for rock quarries have been addressed. Should these alternative routes not be approved, then ODOT and Idaho Power will need to reengage and determine the next course for mitigation.

As for the Scenic Byways ODOT still has several concerns and mitigation measures needing to be addressed. One type of mitigation that needs to be taken is a look at the possibly of placing the transmission facility underground. This would only need to take place for the Hells Canyon and Grande Tour Scenic Byways. This has taken place with previous transmission lines impacting Scenic Byways, such as the Great River Road Scenic Byway in Minnesota.

Previous Correspondence

January 30, 2012 – ODOT letter of concerns to Idaho Power regarding the proposed alignment.

April 9, 2013 – ODOT comments on the preliminary Application for Site Certificate.

March 5, 2015 – ODOT submits a response to the Draft Environmental Impact Statement.

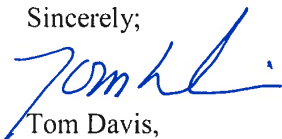
August 31, 2017 – ODOT submits a response to the Amended Preliminary Application for Site Certificate.

November 23, 2018 – ODOT submits a response to the Site Certificate review.

December 21, 2018 – ODOT submitted a response follow-up to the Site Certificate review letter.

March 20, 2019 – ODOT follow-up letter to ODOE addressing ODOT concerns from previous correspondence.

Sincerely;



Tom Davis,
District 14 Operations Coordinator



Oregon

Kate Brown, Governor

Department of Transportation

District 14

1390 SE 1st Avenue

Ontario, OR, 97914-2945

Phone: (541) 823-4017

Fax: (541) 889-6600

Email: thomas.j.davis@odot.state.or.us

TO: Kellen Tardaewether
Oregon Department of Energy
550 Capitol St N.E., 1st Floor
Salem, OR 97301

FROM: Tom Davis, District 14 Operations Coordinator
Oregon Department of Transportation
1390 SE 1st Avenue
Ontario, OR 97914
(541) 823-4017
Thomas.j.davis@odot.state.or.us

DATE: March 20, 2019

RE: Oregon Department of Transportation Follow-up letter for the Boardman to Hemingway
Transmission Line Project

Kellen: this letter is in response to the ongoing process between Oregon Department of Transportation (ODOT) and Idaho Power. We are working through the process to address the impacts to our previous listed quarries and Scenic Byways.

Since 2011 ODOT has been working on the Boardman to Hemmingway project addressing concerns on ODOT highway and interstate right of ways, quarries and Scenic Byways.

January 30, 2012 – ODOT letter of concerns to Idaho Power regarding the proposed alignment.

April 9, 2013 – ODOT comments on the preliminary Application for Site Certificate.

March 5, 2015 – ODOT submits a response to the Draft Environmental Impact Statement.

August 31, 2017 – ODOT submits a response to the Amended Preliminary Application for Site Certificate.

November 23, 2018 – ODOT submits a response to the Site Certificate review.

December 21, 2018 – ODOT submitted a response follow-up to the Site Certificate review letter.

Even though in previous ODOT communications with ODOE, ODOT still has three quarries and Scenic Byways that will be impacted by the Boardman to Hemmingway project. ODOE has mentioned that the application is currently “locked-in” for review for the Council. This will mean that changes to the existing route

will need to go to the Council through an amendment process.

Quarries

On March 8, 2019 Idaho Power submitted to ODOT alternative routes (see attached) involving each of the impacted quarries. These quarries do have a value to ODOT. Idaho Power mentioned that these alternatives have not been presented to the impacted property owners or to ODOE. Two of these alternatives will still have a direct impact to ODOT. ODOT will lose production at these quarries which will require future sites to be developed. These alternative routes were developed based on previous communications between ODOT and Idaho Power to provide the least amount of impact.

Idaho Power will need to work with the impacted property owners on the three realignment alternatives. If the property owners are in agreement with these proposals, Idaho Power will include these through the amendment process through ODOE. Should any these alternative not move forward, Idaho Power shall reengage ODOT to work towards an agreeable solution.

Other items that ODOT and Idaho Power has agreed to work together on:

- Roads and access to or through ODOT quarries.
- Easement form. ODOT & Idaho Power both have Easement forms that are normally used. Both will work together in developing language for the Easement Agreement.

Scenic Byways

During the review process ODOT felt that the Scenic Byways did not have enough information to base a review of the impacts to the Scenic Byways. On March 12, 2019 ODOT and Idaho Power had a conference call to discuss additional information showing the impacts to the Scenic Byways.

Overall, ODOT recommends that Idaho Power's Boardman to Hemingway transmission line project avoids all impacts to the intrinsic values of the Hells Canyon All American Road, Elkhorn Drive Scenic Byway, Journey Through Time Scenic Byway and the Grande Tour Route. The Scenic Byways' intrinsic qualities include scenic, historic, recreational, cultural, archeological, and natural resources.

Should the new transmission line project impact any of the Scenic Byways' intrinsic qualities, Idaho Power should mitigate for the impacts appropriately. To reduce impacts to scenic qualities, the structures should be replaced in kind or with a structure size and color that responds to the surrounding environment.

- Vertical features should respond to the surrounding landscape. The observer's eye should be led to the landscape, rather than to the structure itself.
- The color of features should be derived from the natural color tones of the surrounding landscape and selected to harmonize with the natural setting.
- Texture of the features should be rough with an irregular pattern, rather than smooth and reflective for the purpose of minimizing the reflectivity of the various features. The textures should blend with the natural setting.
- In vegetated or forested areas, use native vegetation to screen views of construction impacts such as slope cuts that are visible from the byways and points of interest.

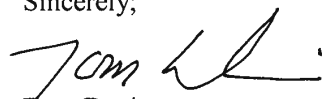
Idaho Power sent requested information (see attachments) which ODOT has reviewed. Based on the analysis on information provided by Idaho Power ODOT has found the following:

- Grande Tour Route –The Proposed Route would be visible, especially in the vicinity of Ladd Marsh. The proposed route passes within 0.2 miles of the western portion of the Grande Tour Route along Foothill Road near the Ladd Marsh Wildlife Management Area. Viewers on Foothill Road also include bicyclist and pedestrians that use the scenic byway for recreational purposes as well as residents of century farms and historic homesteads built in the early 1900s located along the route. Preferred mitigation would be the alternative alignment (Morgan Lake Alternative) in order to keep transmission lines further away from the scenic byway to avoid impacts to its intrinsic qualities. A small portion of the Proposed Route will also be visible from Thief Valley Reservoir. Here the Proposed Route is 3.75 miles west. Mitigation to be considered could be stained towers with a natina finish to assist in making the towers less visible in the vicinity of Thief Valley Reservoir.
- Hells Canyon All American Road – The Hells Canyon All American Road includes part of OR 86 in Baker County. The Proposed Route crosses OR 86 in the vicinity of the Oregon Trail Interpretive Center with potentially significant visual impacts from the transmission line towers. Proposed mitigation to use a lower H-frame structure with a natina finish that are visible from OR 86 would be comparable to existing towers for the 230-kV transmission line that could potentially reduce impacts to scenic qualities.
- Journey Through Time Scenic Byway – The Proposed Route is approximately 3 miles from the scenic byway but would not be visible from this portion of the byway in the vicinity of Baker City.
- Elkhorn Scenic Byway – The Proposed Route, is located approximately 3 miles from the scenic byway in the vicinity of Baker City but would not be visible from this portion of the byway. The Proposed Route is about 7.3 miles from the scenic byway in the vicinity of Haines. Some portion of the Proposed Route may be visible in this area but would most likely be blocked by terrain or far enough away to not be an impact to the scenic qualities of the byway.
- Blue Mountain Scenic Byway – The Proposed Route is located approximately 9.5 miles at its closest point to the scenic byway and would not be visible.

Conclusion

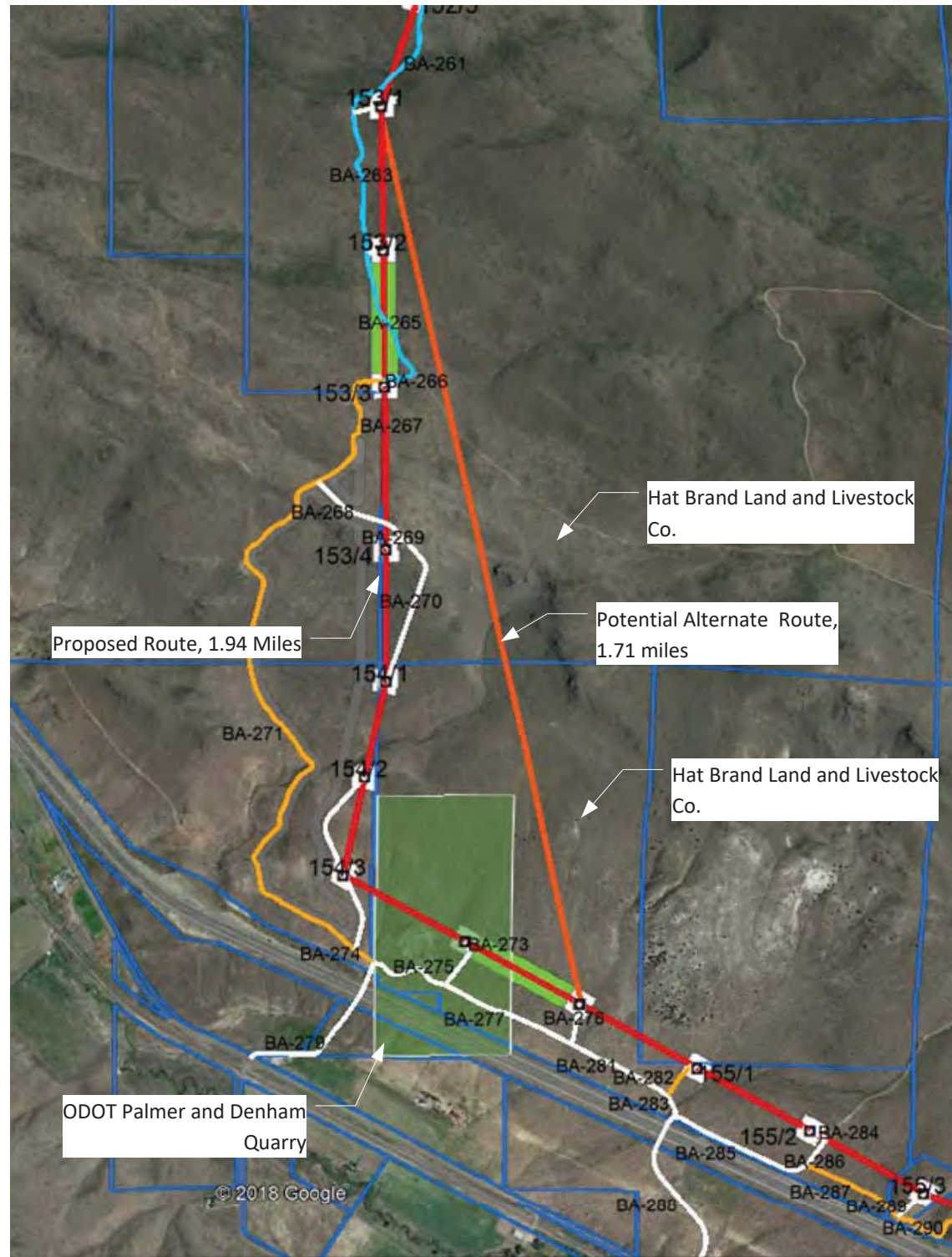
This letter identified the two remaining issues that had been previously documented throughout the ODOE process. In working with Idaho Power, ODOT's concerns for the rock quarries and Scenic Byways have been addressed. Should these alternative routes not be approved, then ODOT and Idaho Power will need to reengage and determine the next course for mitigation.

Sincerely;



Tom Davis,
District 14 Operations Coordinator

Parker and Denham ODOT Site



Proposed Route: 1.94 miles
Affected Landowners: Hat Brand Land & Live Stock LLC, Trindle Land LLC.

Alternate Revised Route: 1.71 miles
Affected Landowners: Hat Brand Land & Live Stock LLC.

Durbin ODOT Site



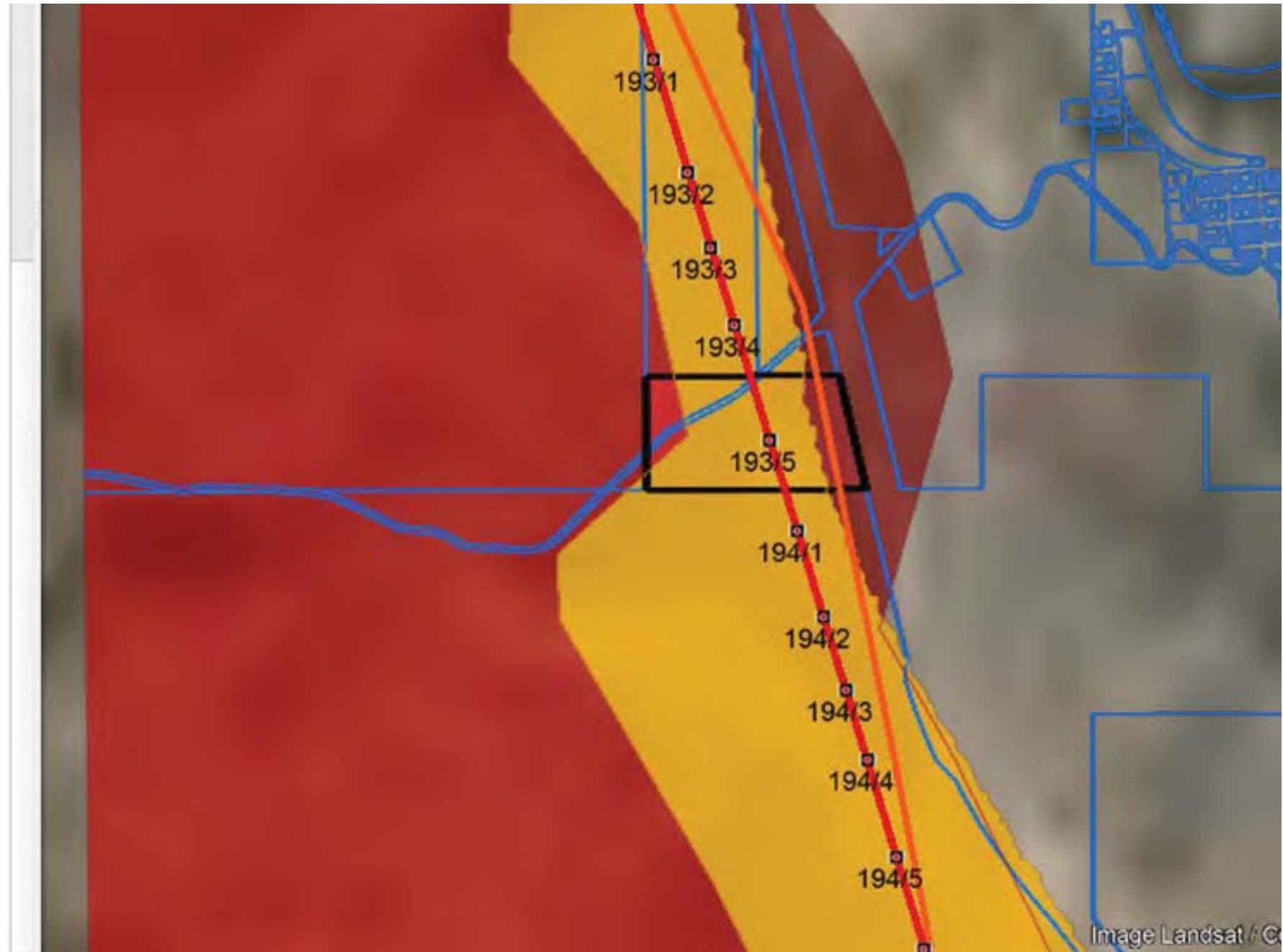
Proposed Route: 2.77 miles
Affected Landowners: Bokides, USA,

Alternate Revised Route: 2.78 miles
Affected Landowners: Bokides, Davis, USA

On the edge of Sage Grouse Habitat, in Remapped Core Area (see attached sheet)

The project is already crossing a number of other parcels owned by Davis.

- HistoricTrails_point.shp
- HistoricTrails_Line.shp
- ODOT
- Layers
- UEC 115kV Transmission Line.kmz
- Existing Utilities
 - Existing_Transmission_Lines_revised.shp
 - Existing Utilities
 - Structures_Support
 - BPA_TransmissionLine_Web
 - PrimaryUgLines
 - SecondaryOhLines
 - SecondaryUgLines
 - Trans
 - ForeignTLines
 - IPCPOH
 - Buried Gas Pipelines
 - Williams NWP
 - Legend
 - Access
 - NWP
 - GTN_PL.shp
 - GTN_PL
 - Tesoro/Chevron
- B2H Sage-grouse Core Areas.kmz
 - Sage-grouse Core Areas
 - Core Area (CAT 1)
 - Core Area Exclusion Area (0.6-mile)
 - Core Area Remap (CAT 2)
 - Low Density Area (CAT 2)



ESTERSON Sarah * ODOE

From: Susan Albers <susan.albers@lagrandesd.org>
Sent: Thursday, August 22, 2019 4:17 PM
To: B2H DPOComments * ODOE
Subject: Fwd:
Attachments: doc04563820190822161349.pdf

----- Forwarded message -----
From: <ce.copier@lagrandesd.org>
Date: Thu, Aug 22, 2019 at 4:14 PM
Subject:
To: <susan.albers@lagrandesd.org>

TASKalfa 7002i
[00:17:c8:4d:93:20]

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Sue Albers
Central School
541-663-3530

August 5, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

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

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

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

5.2 La Grande Area Slope Instability

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

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

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

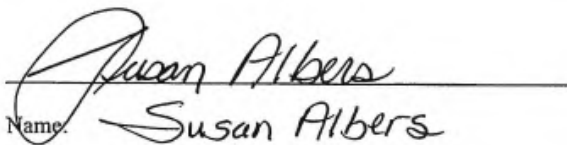
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

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

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

The Council should DENY the request for a site certificate.

Sincerely,

A handwritten signature in cursive script, reading "Susan Albers", is written over a horizontal line.

Name: Susan Albers
Address: 301 C Avenue
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.

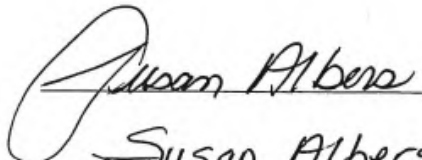
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire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

Susan Albers

Address:

301 C Avenue
LaGrande, OR 97850

August 15, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

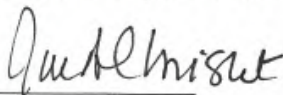
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous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

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

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

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

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



Signature

Printed name: Jennifer M Albright

Mailing address: 1206 Broadway Street, Baker City, OR 97814-2951

Email address: albright.jenny@gmail.com
phone number: (optional) 541 519 7828

August 15, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.

4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44° 48' 48.26"N 117° 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.
5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
 - a. It is a BLM ACEC area managed for public tourism
 - b. It is the single most visited tourist facility in Baker County
 - c. The quality of the facility is outstanding
 - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

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

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

Thank you,



Signature

Printed Name: Jennifer M Albright

Mailing Address: 1206 Broadway Street, Baker City, OR 97814-2951

Email: albright.jenny@gmail.com

August 12, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

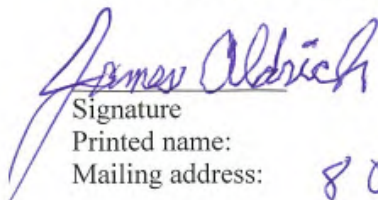
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous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

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

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

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

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


Signature
Printed name:
Mailing address:

Email address:
phone number: (optional)

807 Main St.
La Grande OR
97850

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

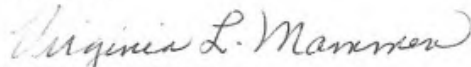
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,



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

gmammen@eoni.com

Exhibit 1

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

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit 2

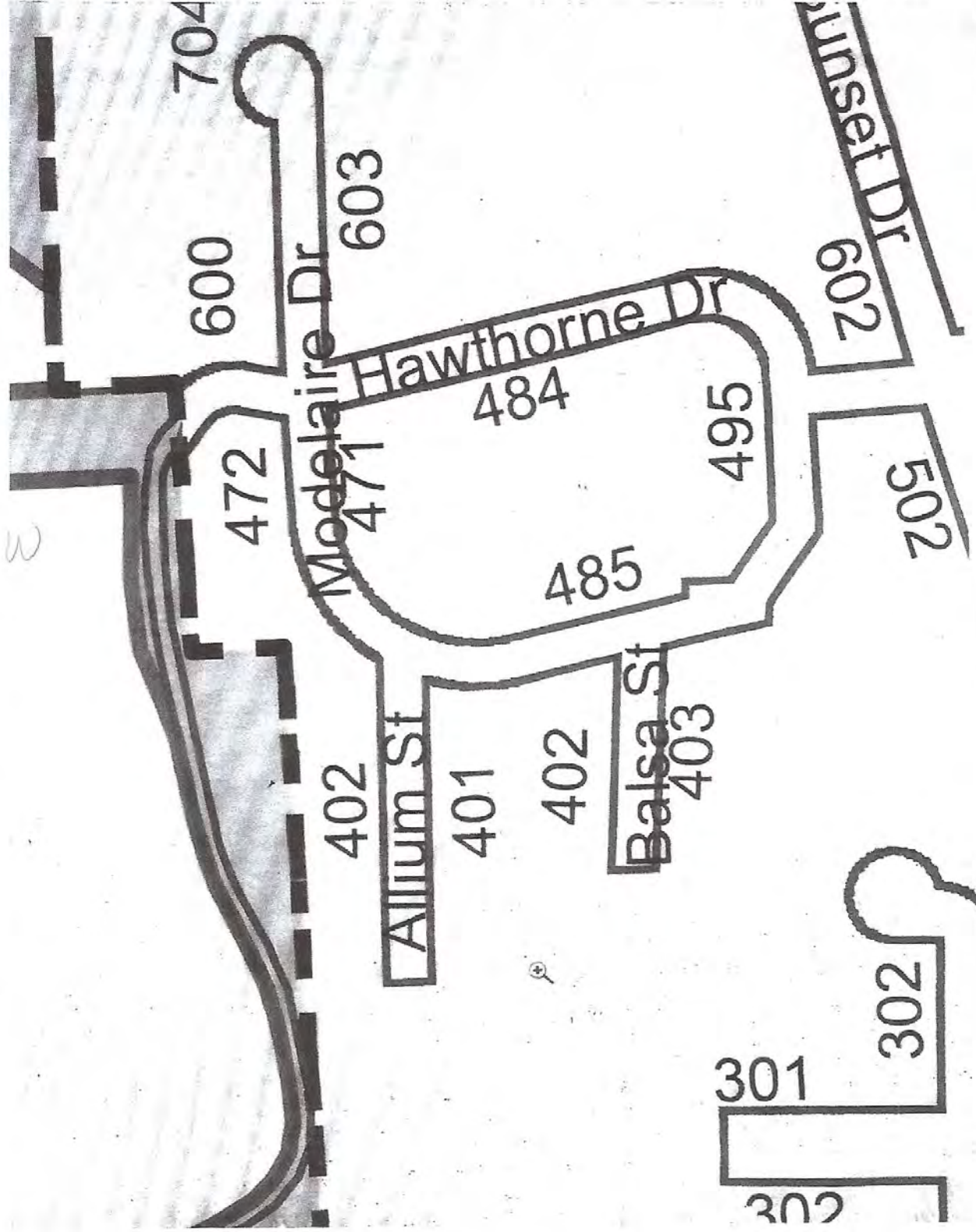


Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

103

IV. CONCLUSIONS

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

106

107

V. ORDER AND CONDITIONS OF APPROVAL

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

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

118

119

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

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

132

133

VI. OTHER PERMITS AND RESTRICTIONS

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

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

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

145

146

Exhibit 6

7/25/2019

Gmail - Modelaire Roadway Specifications



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



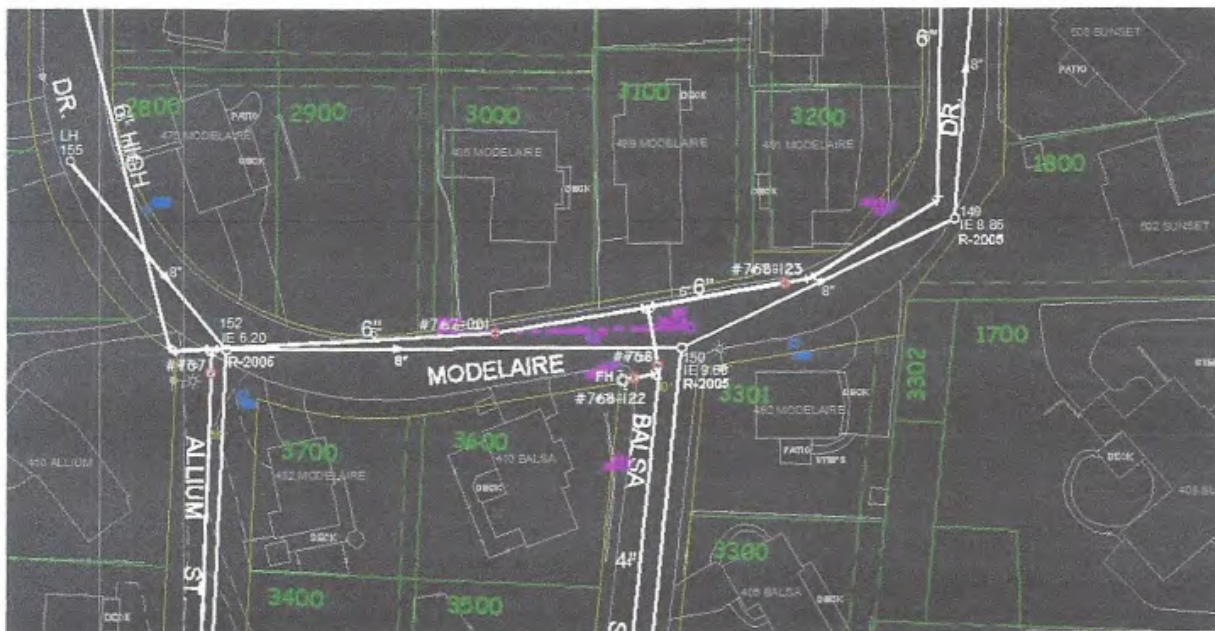
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

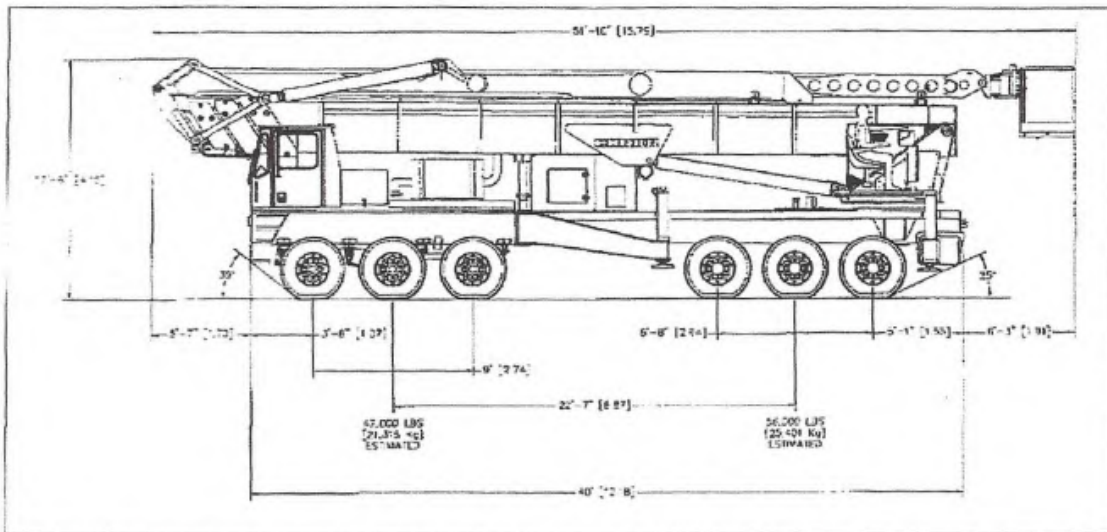


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Exhibit 12

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

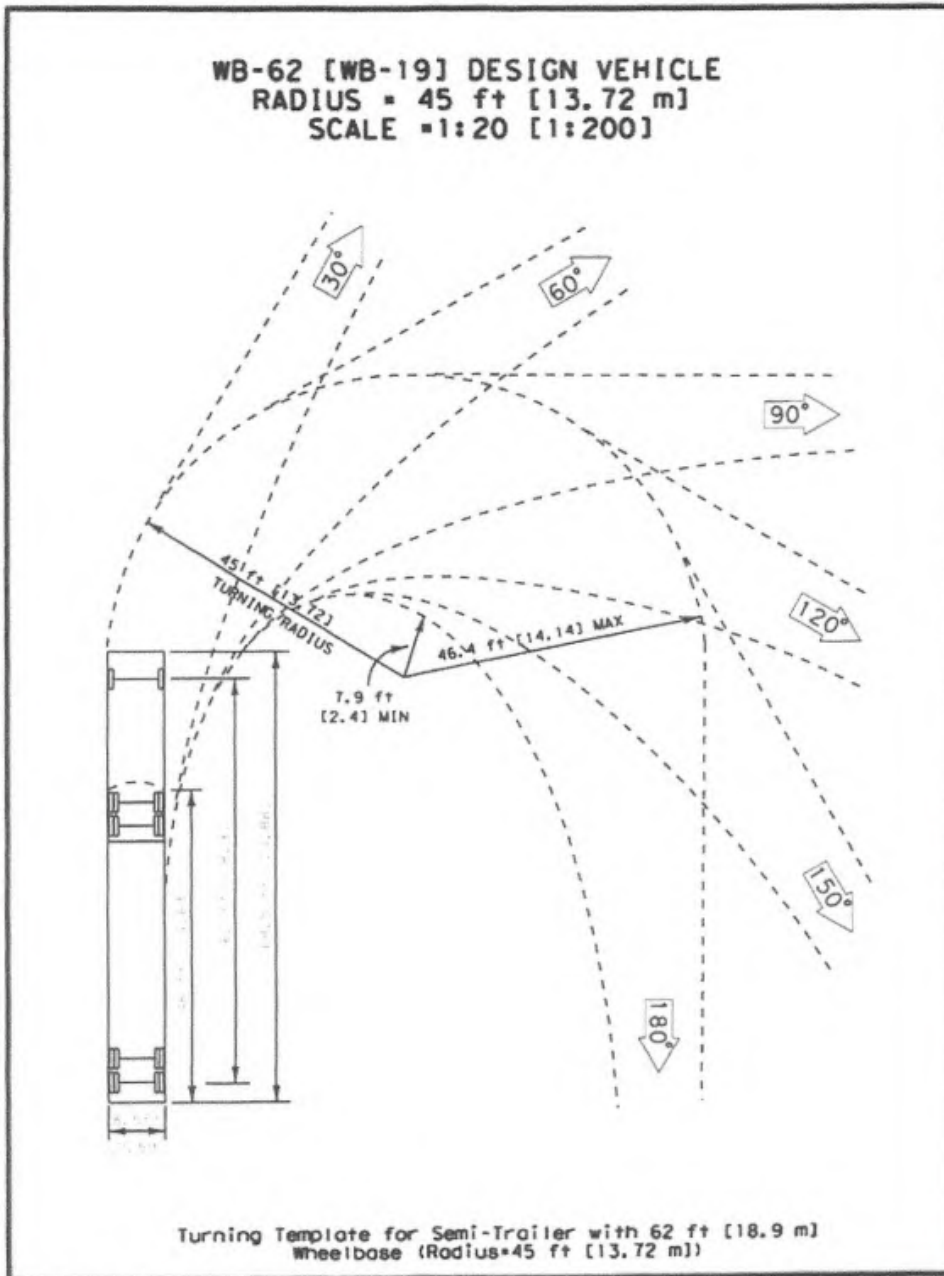


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

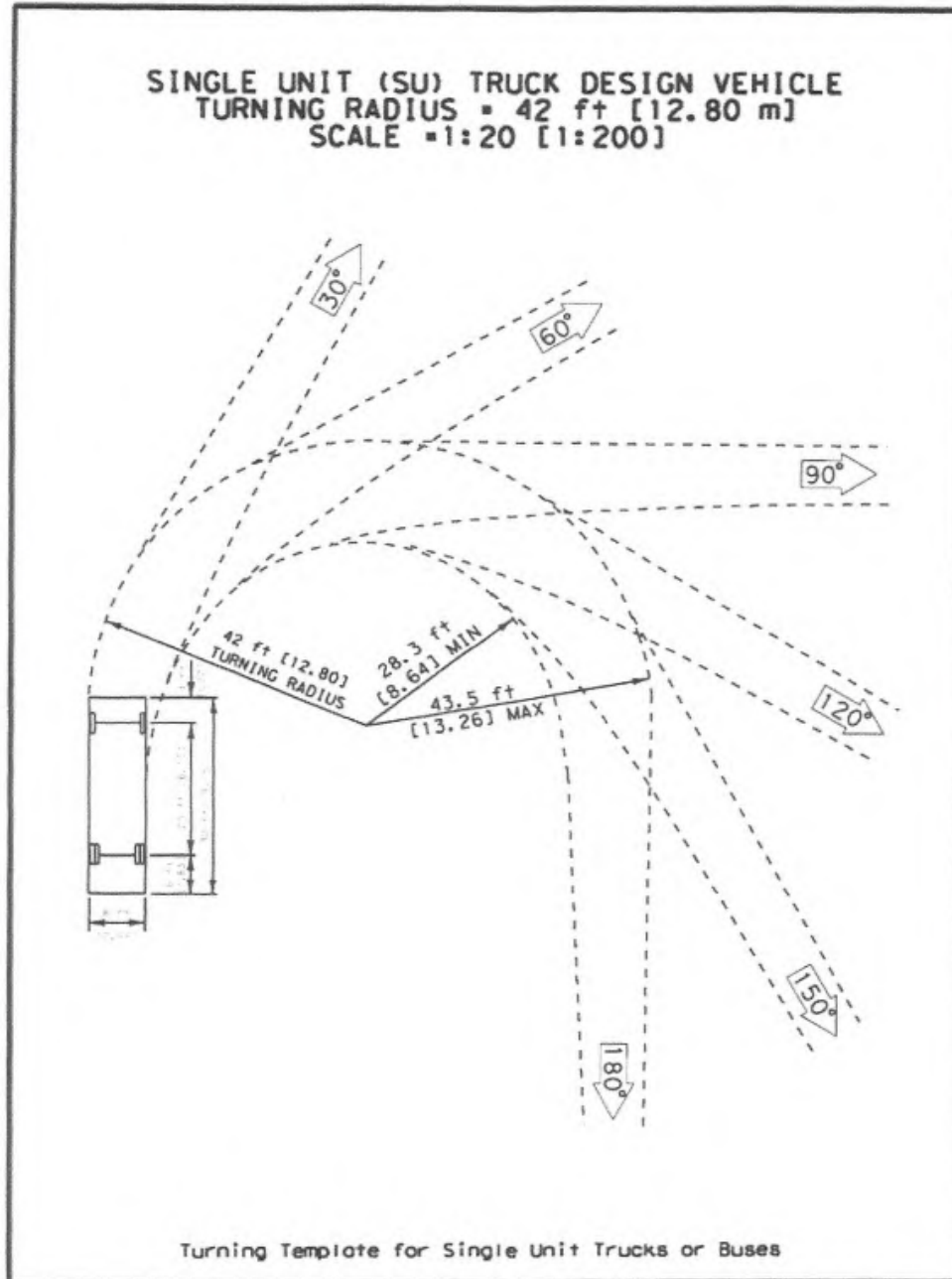


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

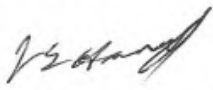
Section 17. TRUCK ROUTES

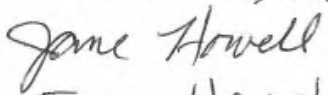
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

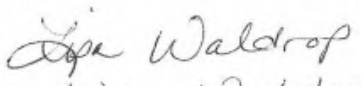
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

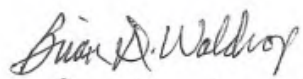
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

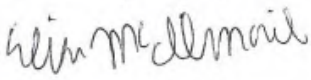
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SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
ADDRESS 482 Modelaire DR
EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
ADDRESS 475 MODELAIRES DR.
EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRES DR.
EMAIL mcilmail115@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

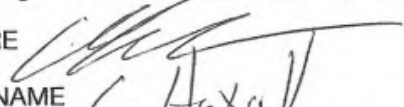

Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

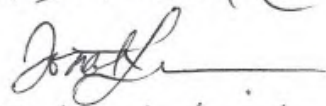

Chris Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

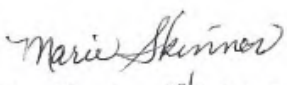

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

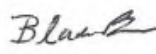

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE


PRINTED NAME

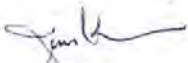
ADDRESS

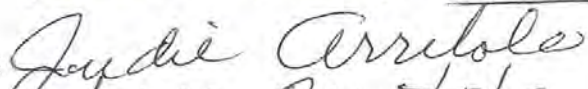
EMAIL

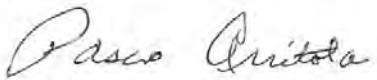

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

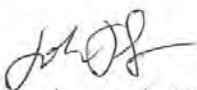
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@comi.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

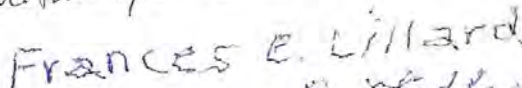
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL jarritola@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL parritola@charter.net


SIGNATURE 
PRINTED NAME John Bazuta
ADDRESS 414 Hawthorne LG, OR 97850
EMAIL

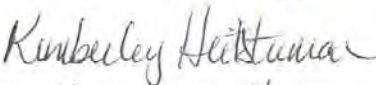
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

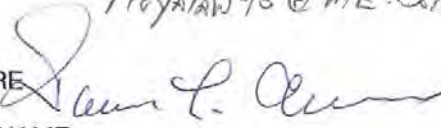
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

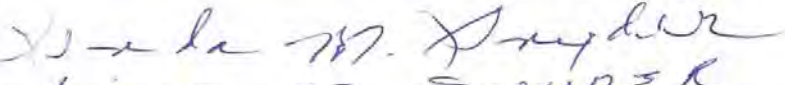
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

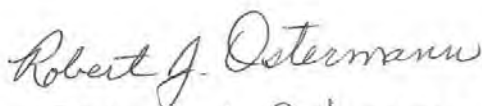
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com

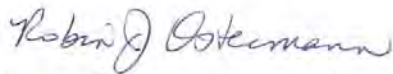
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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyakaw95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

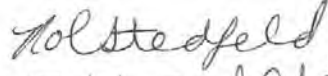
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

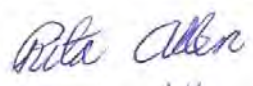
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

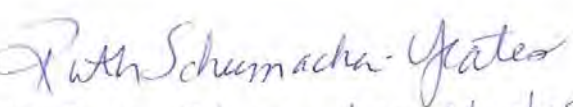
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

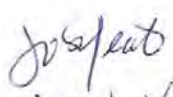
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

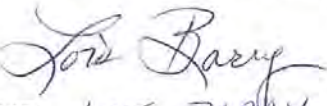
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

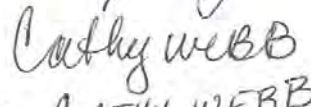
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

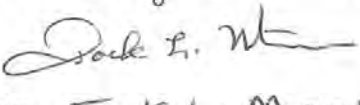
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

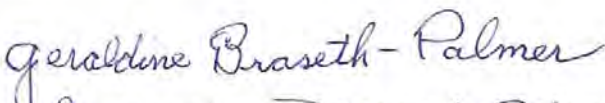

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

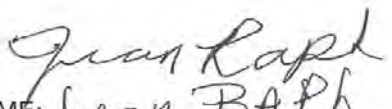
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

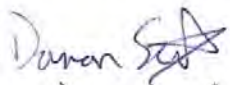
SIGNATURE 
PRINTED NAME CATIE WEBB
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EMAIL thunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

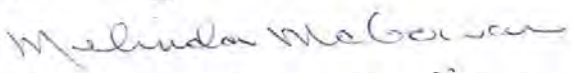
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 BLDENEST DRIVE LA GRANDE, Ore 97850
EMAIL 


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

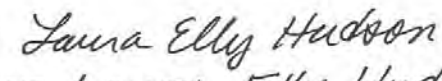
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SIGNATURE 
PRINTED NAME Damon Sexton
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EMAIL Sexton.damon@gmail.com

SIGNATURE 
PRINTED NAME Cory 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
ADDRESS 605 F Ave, La Grande OR 97850
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 v1wd1910@gmail.com

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

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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, LaGrande, Or. 97850
EMAIL asherei@frontier.com

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

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

SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay 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 2009 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 Belketer 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 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

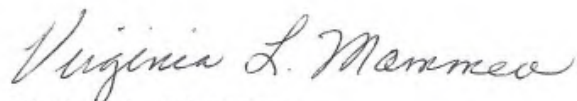
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less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

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

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

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

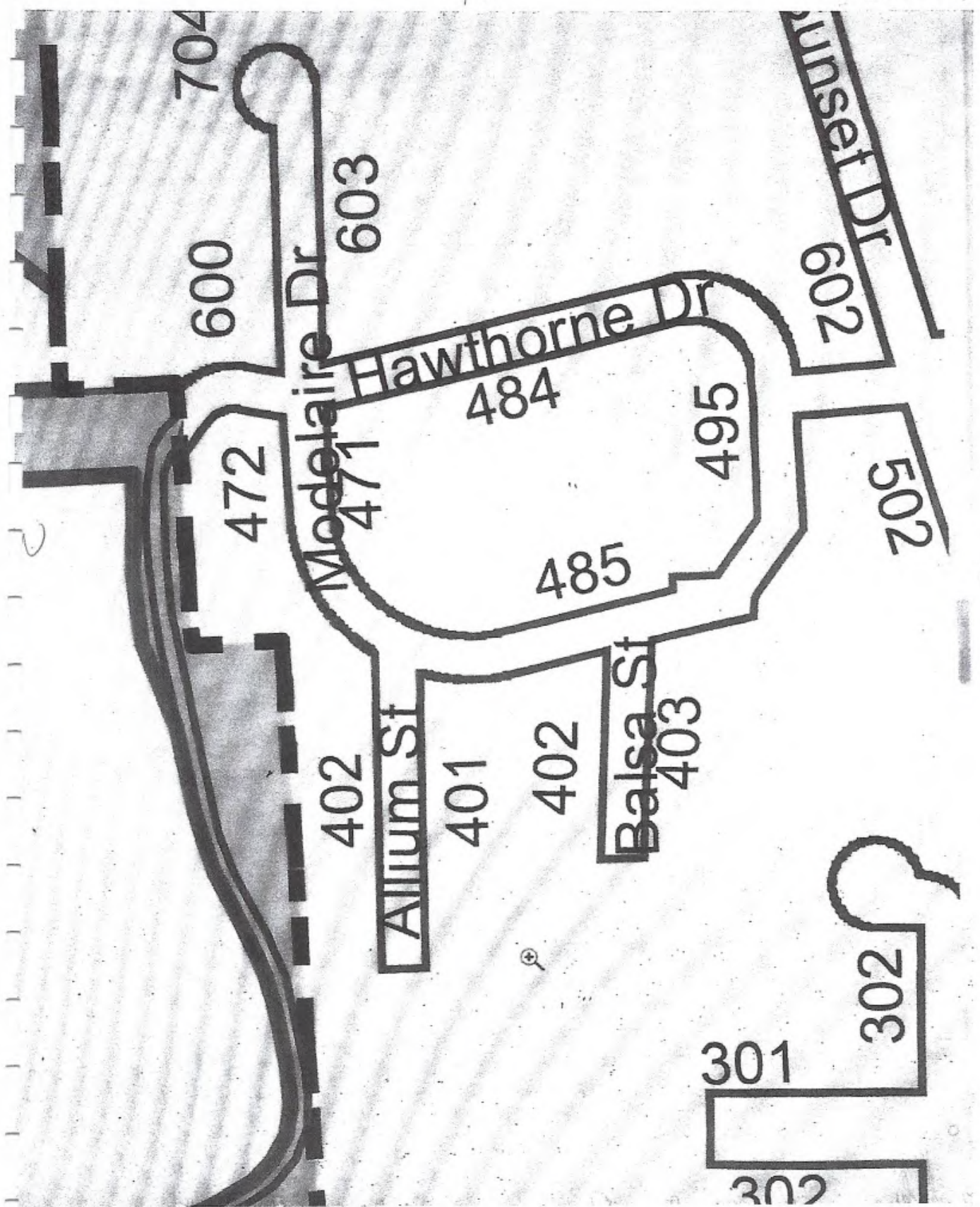
Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1



N

2

11

5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

1 **3.3 Predicted Noise Levels**

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

4 **3.3.1 Construction Noise**

5 **3.3.1.1 Predicted Construction Noise Levels**

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

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

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

18 **Blasting and Rock Breaking**

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

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.

34 **Implosive Devices**

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

Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



Exhibit 4a

8/5/2019

Oregon Secretary of State Administrative Rules

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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.

Exhibit 4b

8/5/2019

Oregon Secretary of State Administrative Rules

(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;

Exhibit 5a

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.

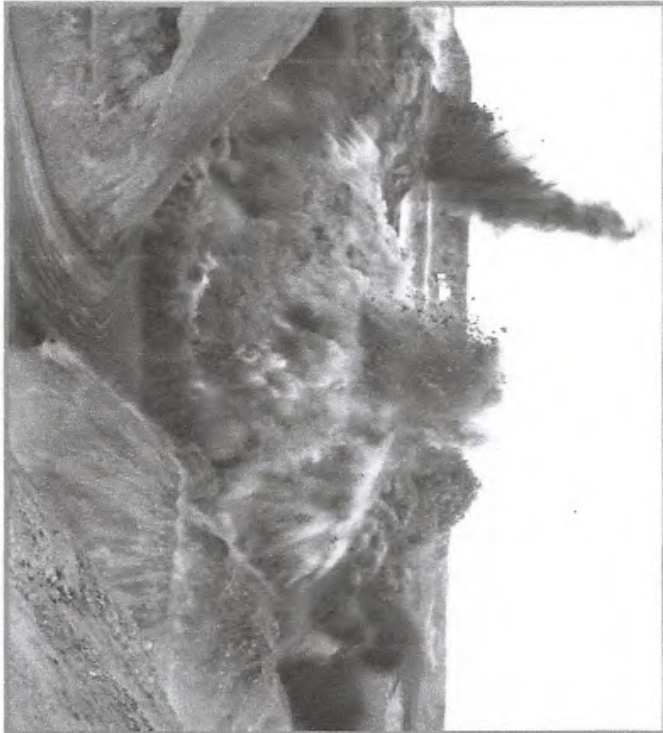
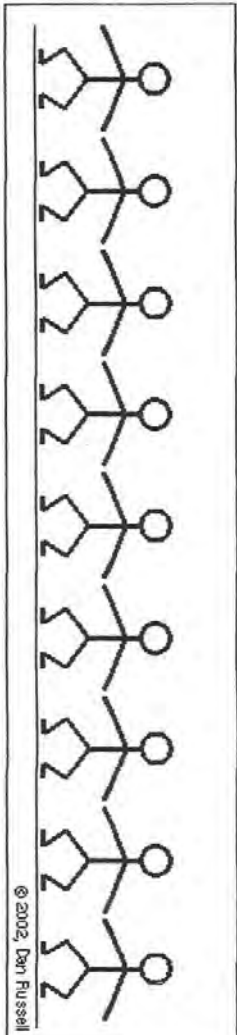


Exhibit 5b

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.

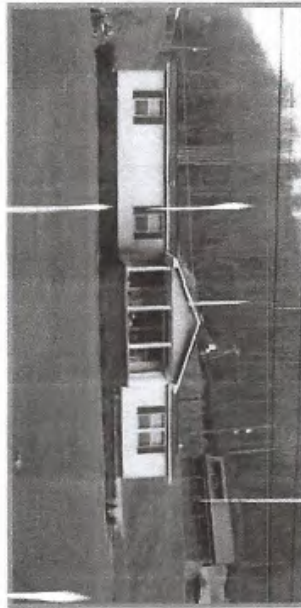
Flyrock is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.



Exhibit 5g

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

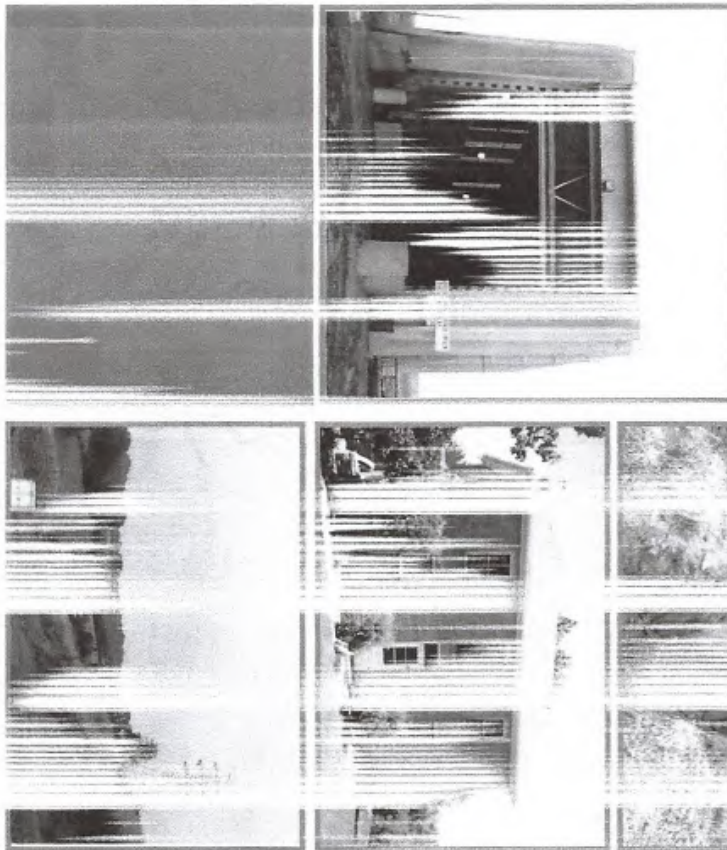
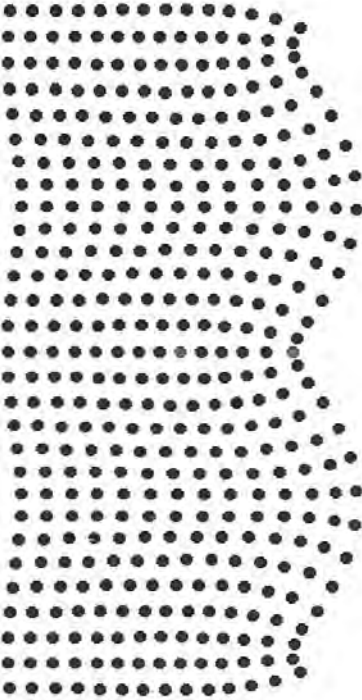


Exhibit 5D

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.

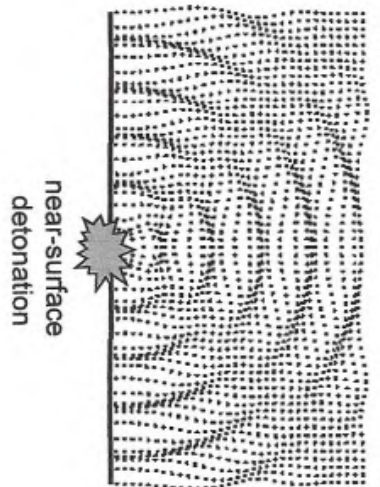
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

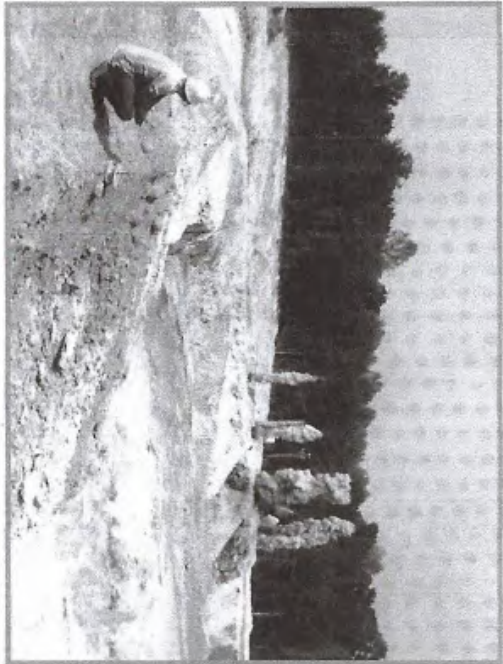
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

Exhibit 5 F

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

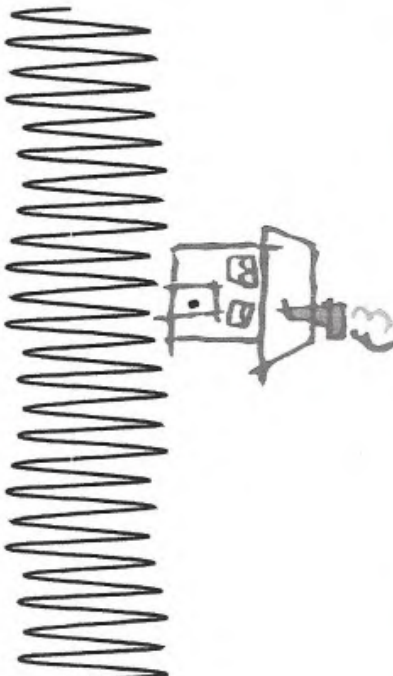
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

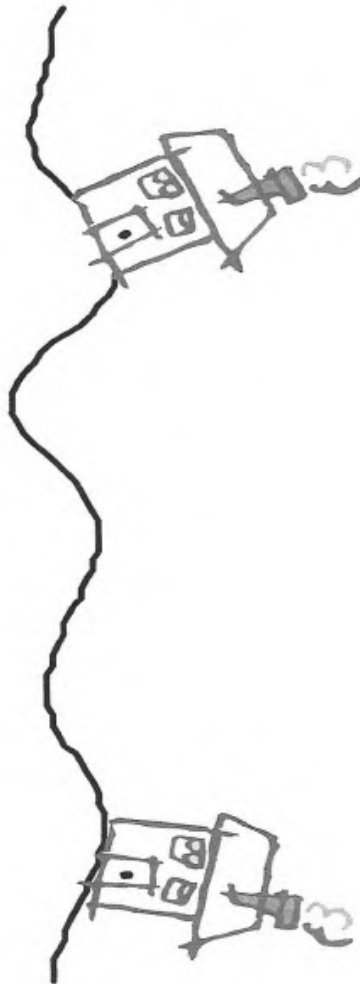


Ground Vibration Structure Response

Exhibit 5g



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.

8/4/2019



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A noisy problem - Harvard Health

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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."

Exhibit 7a

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal



UVM Medical Center Blog (<https://medcenterblog.uvmhealth.org>) » Blog (<https://medcenterblog.uvmhealth.org/blog/>) »
Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

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

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

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

The Sounds of a Hospital

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

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

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

The Research on Noise, Quiet, and Healing

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal

Exhibit 76

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.

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

Exhibit 8a

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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



Exhibit 8b

8/4/2019

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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).

Exhibit 3

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

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

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

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8/6/2019

<https://knops.co/magazine/noise-and-ptsd/>

Exhibit 9
a



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

Exhibit 9b

8/6/2010

trauma or flashbacks.



Fear

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

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

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

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8/4/2019

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

Exhibit 10a



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

Received 2013 May 14; Accepted 2013 Aug 12.

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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

8/4/2019

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

EXHIBIT 10/12

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,

8/4/2018



Walk Donate Q ☰

Exhibit 11a

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

September 5, 2018

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



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

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

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

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

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

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

Where to begin?

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

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

8/4/2011

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.

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Pages

Additional Resources & Tools

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OPINION

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

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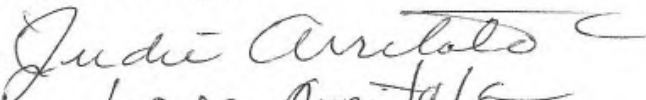


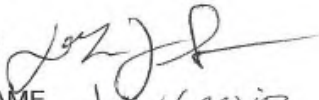
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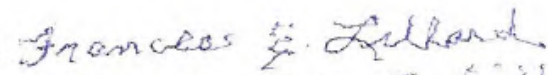
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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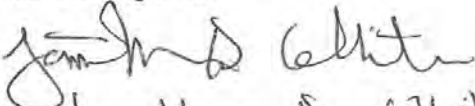
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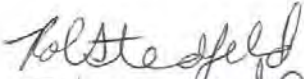
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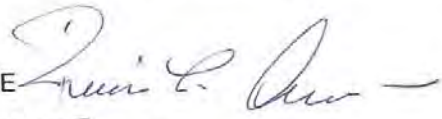
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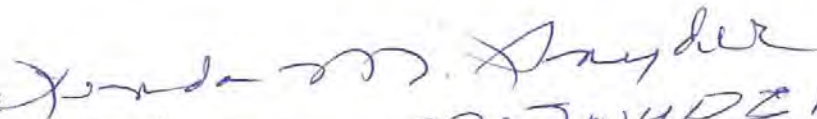
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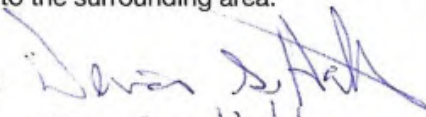
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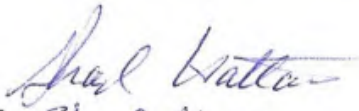
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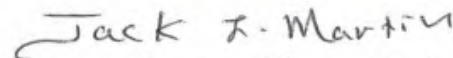
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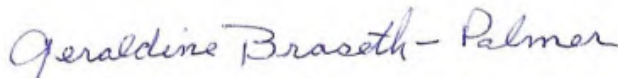
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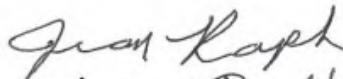
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EMAIL

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 97w Hawthorne Dr, La Grande, OR 97850
EMAIL asherer@frontier.com.

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

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

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Ronnie L. Allen

Mailing Address (mandatory) 410 BALSA STREET

LA GRANDE OREGON 97850

Phone Number (optional) () 541 Email Address (optional) 963-7720

Today's Date: 06-20-2019

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

I live at 410 Balsa Street, La Grande. The rate of the
equipment that will be used to construct the B2H line.

I live one block off of the Oregon Trail and there
are predominant wagon cuts in that area that will be
demolished and other markers like grave sites. For
that reason I am voicing my opinion as a NOLde

(additional space for written comments)

on the Boardman to Hemingway Transmission Line.

I am unable to attend the 4:30-8pm meeting
in La Bore because of a recent broken arm injury
and cannot sit that long.

Sincerely

Rennie Allen

Rennie Allen 6-20/2019

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

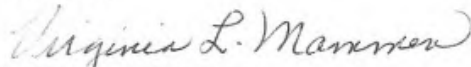
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,



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

gmammen@eoni.com

Exhibit 1

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

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit 2

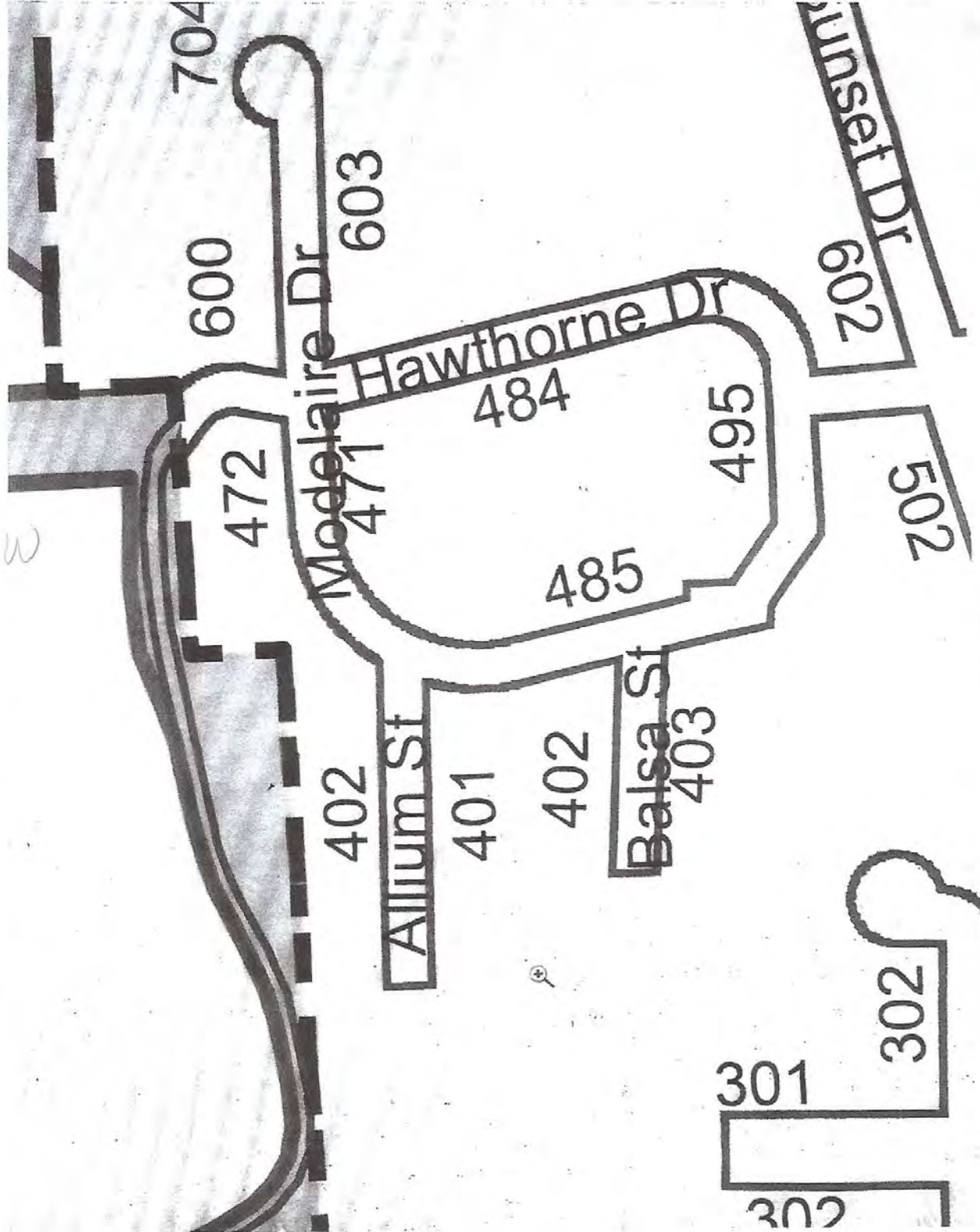


Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

7/25/2019

Gmail - Modelaire Roadway Specifications

Exhibit 6



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



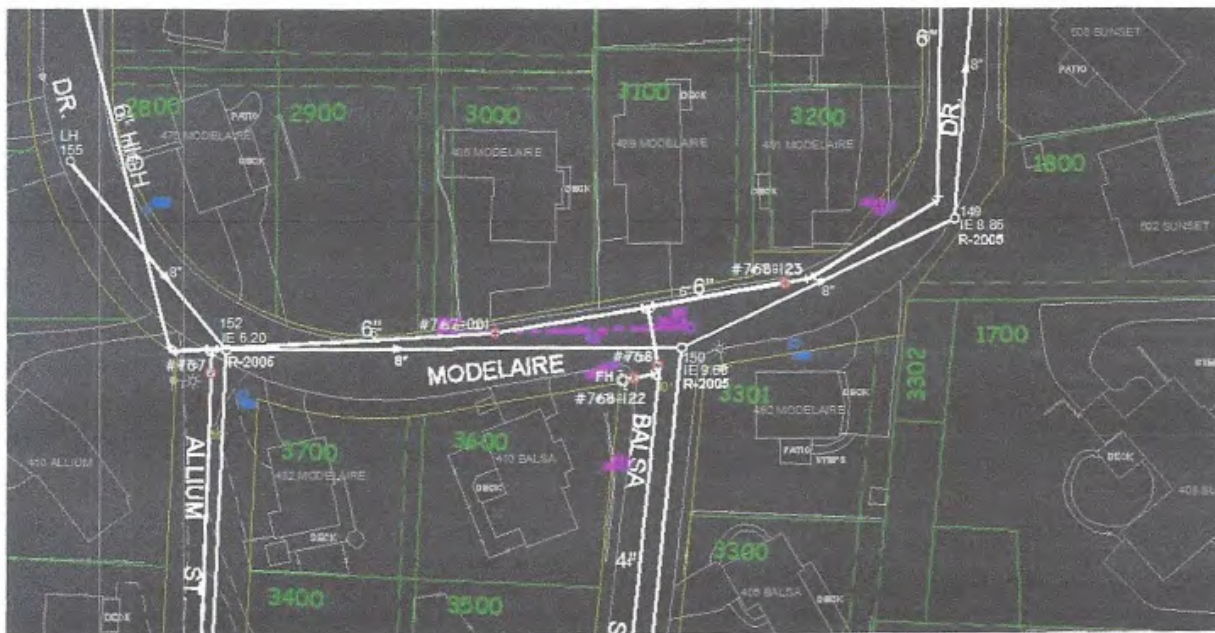
Hawthorne.jpg
150K

Modelaire.jpg
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7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

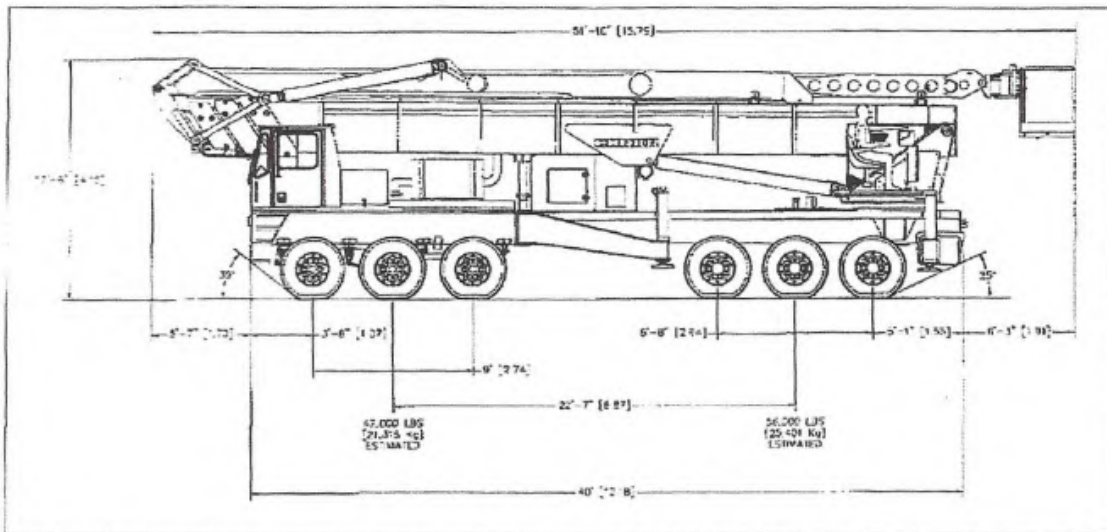


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Exhibit 12

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

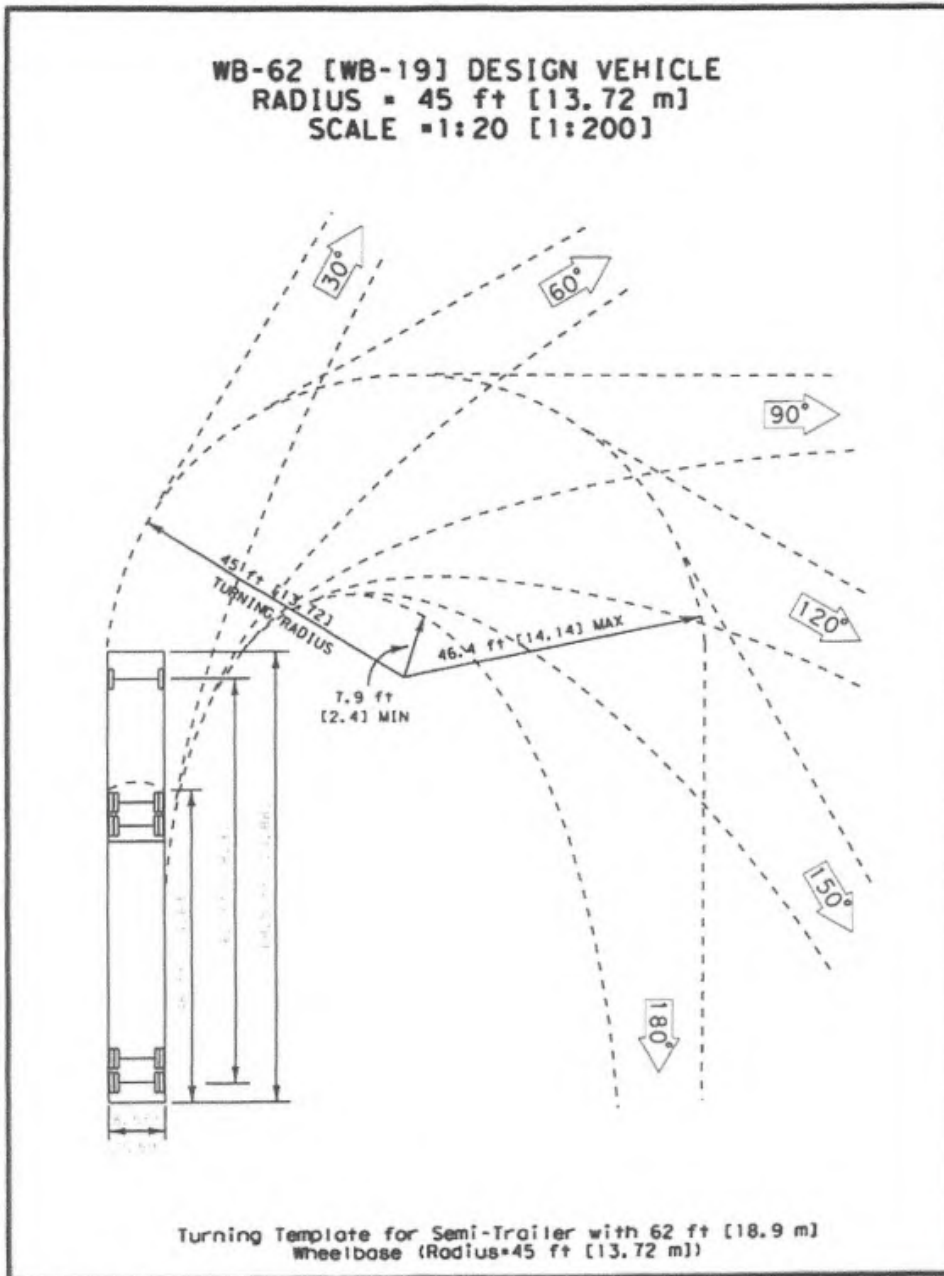


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

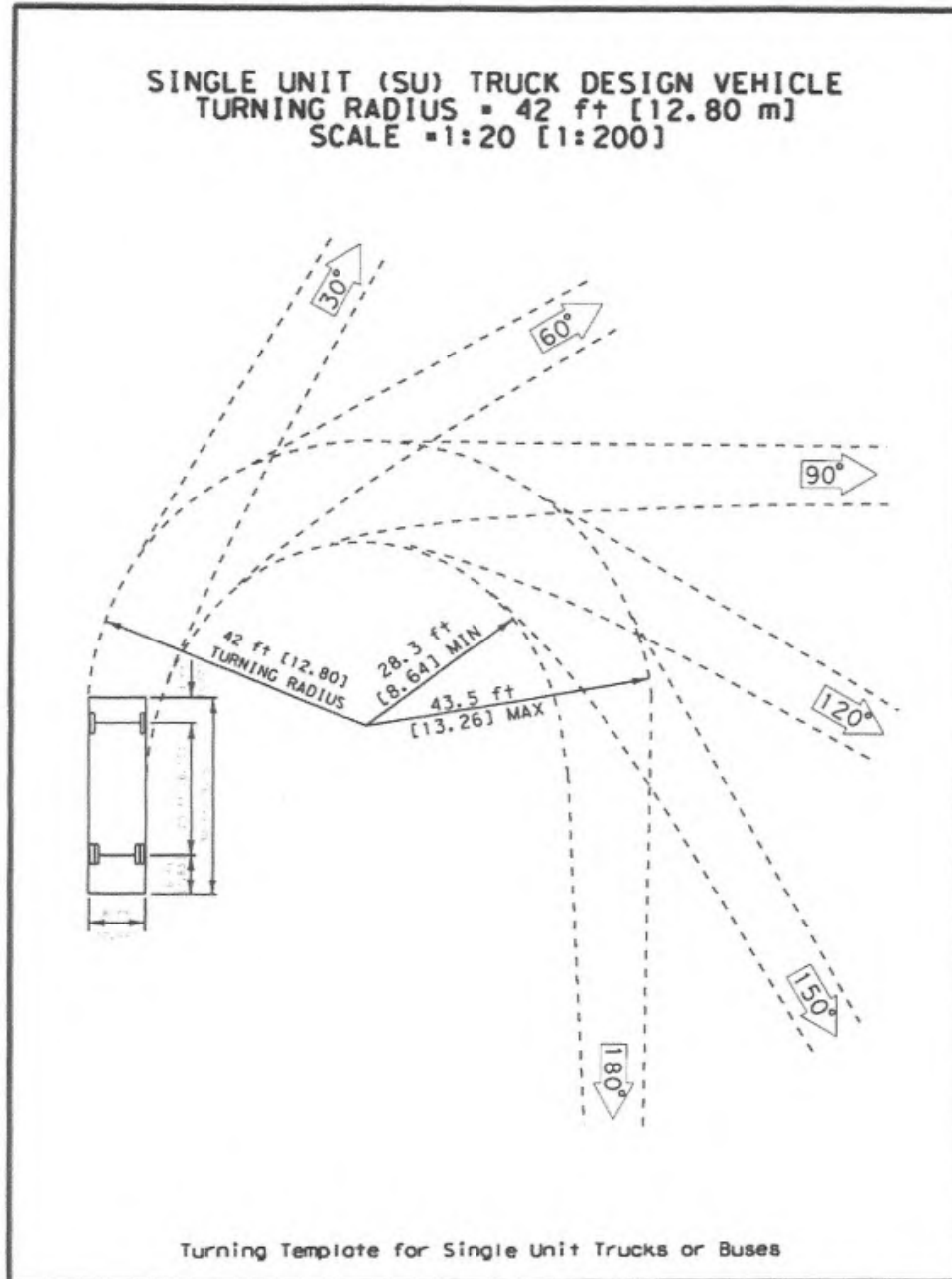


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

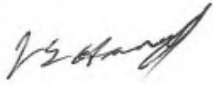
Section 17. TRUCK ROUTES

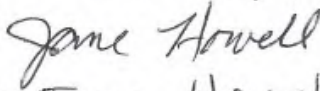
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

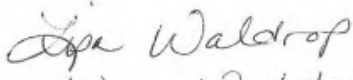
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

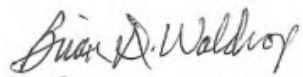
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

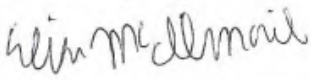
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
ADDRESS 482 Modelaire DR
EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
ADDRESS 475 MODELAIRES DR.
EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRES DR.
EMAIL mcilmail154@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850
jessiehuxell@live.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

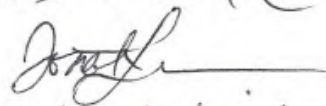

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

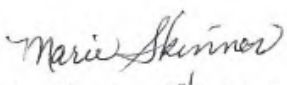

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

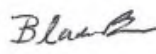

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

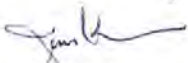
ADDRESS

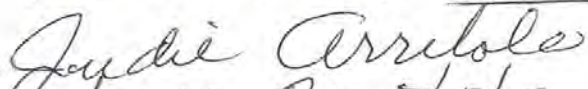
EMAIL

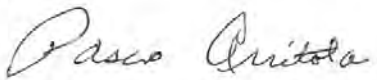

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com


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SIGNATURE 
PRINTED NAME D. Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL d mammen @ coni. com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

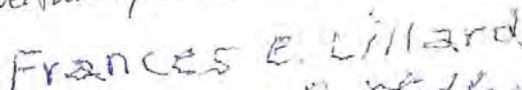
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande OR
EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL Pstola@charter.net


SIGNATURE 
PRINTED NAME John Bazuta
ADDRESS 414 Hawthorne LG, OR 97850
EMAIL

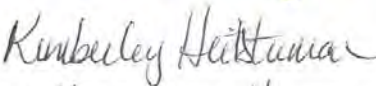
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

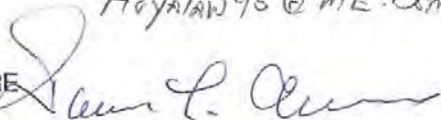
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

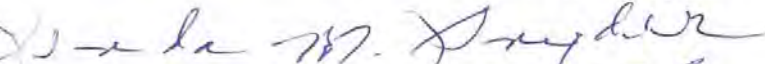
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

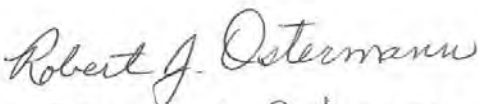
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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

SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Lonnie L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

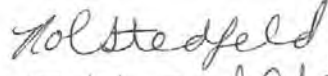
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

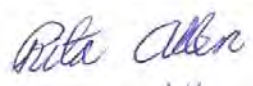
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

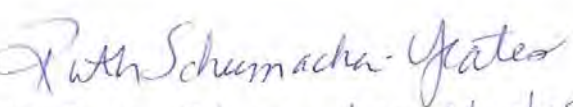
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

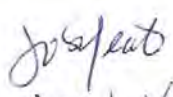
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

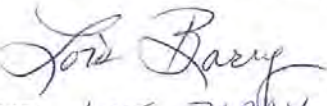
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaire Dr. La Grande
EMAIL rstedfeld@yahoo.com

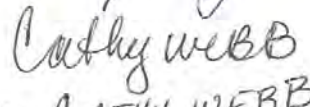
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

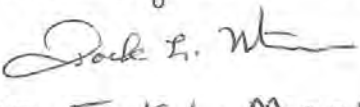
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

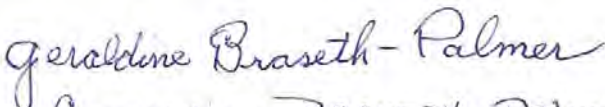

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

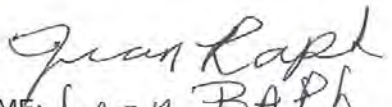
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SIGNATURE 
PRINTED NAME LOIS BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

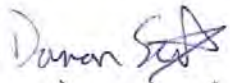
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

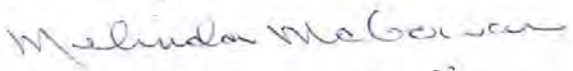
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 BLDENEST DRIVE LA GRANDE, Ore 97850
EMAIL 


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


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

SIGNATURE 
PRINTED NAME Cory Sexton
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EMAIL Corytris@gmail.com

SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE 
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
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL v1wd1910@gmail.com

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

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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, LaGrande, Or. 97850
EMAIL asherei@frontier.com

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

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

SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay 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 2009 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*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Belketer Ln - LaGrande, 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 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

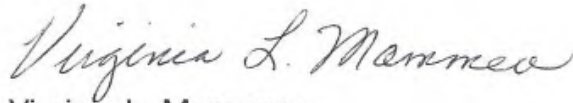
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less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

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

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

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

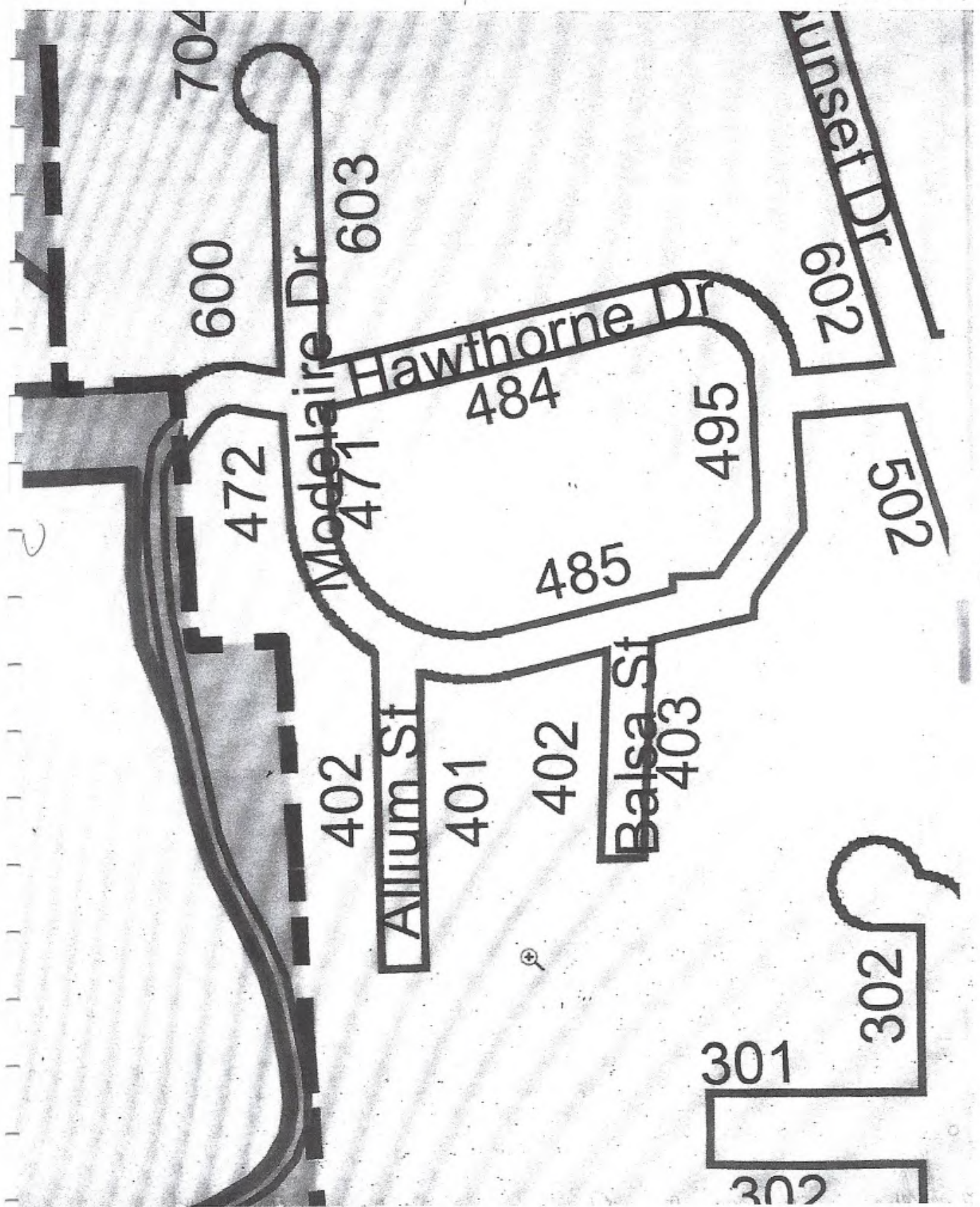
Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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Exhibit 1



N

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11

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Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

1 **3.3 Predicted Noise Levels**

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

4 **3.3.1 Construction Noise**

5 **3.3.1.1 Predicted Construction Noise Levels**

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

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

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

18 **Blasting and Rock Breaking**

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

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.

34 **Implosive Devices**

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

Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



Exhibit 4a

8/5/2019

Oregon Secretary of State Administrative Rules

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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.

Exhibit 4b

8/5/2019

Oregon Secretary of State Administrative Rules

(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;

Exhibit 5a

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.

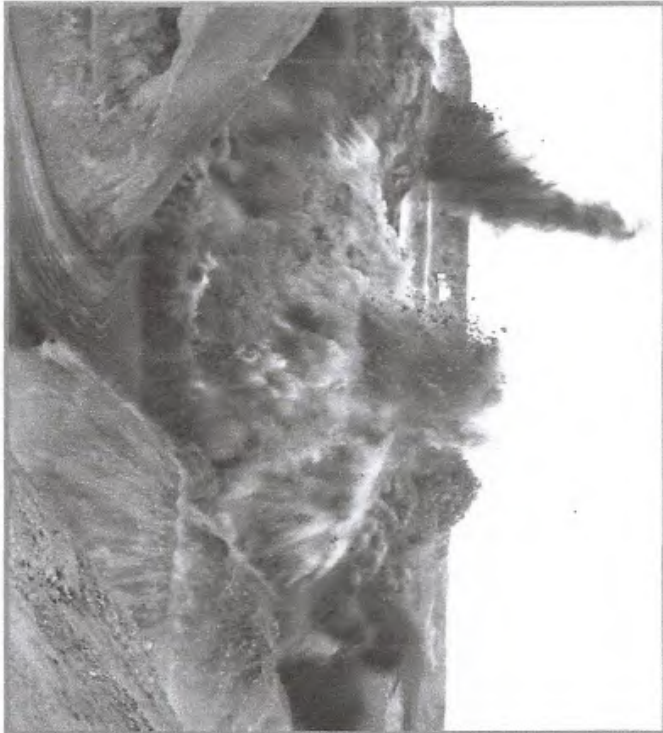
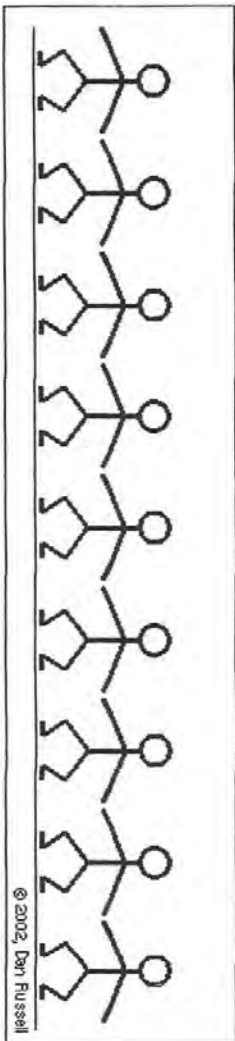


Exhibit 56

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.

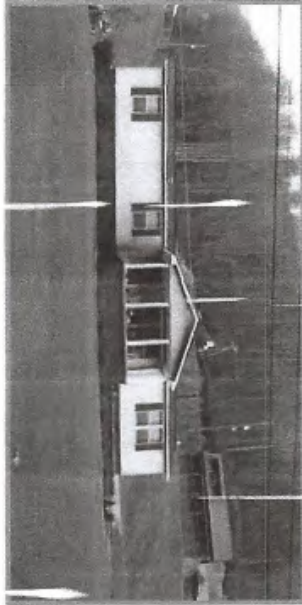
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior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

Exhibit 5g

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

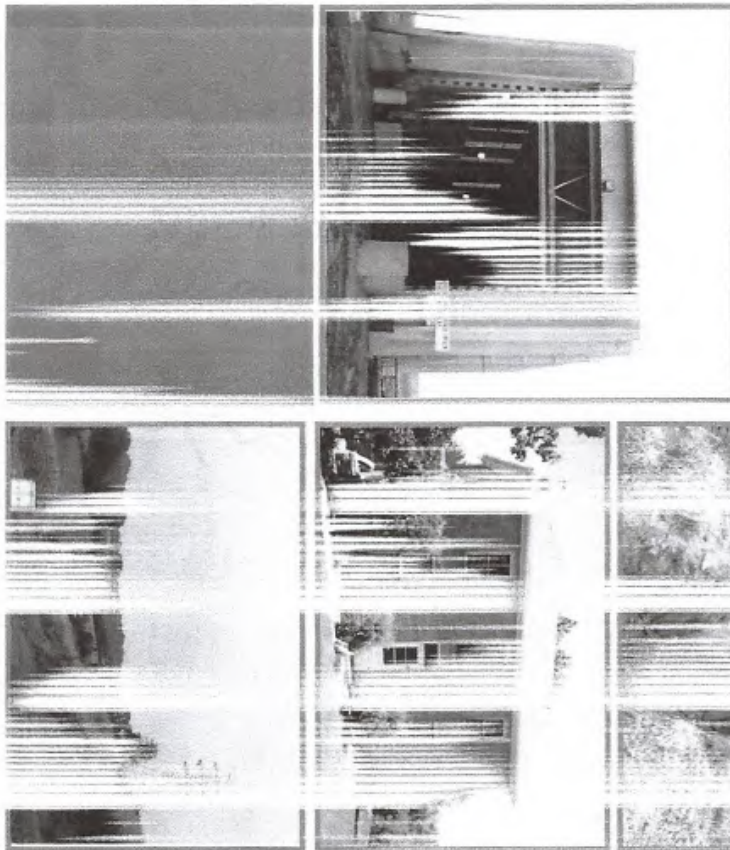
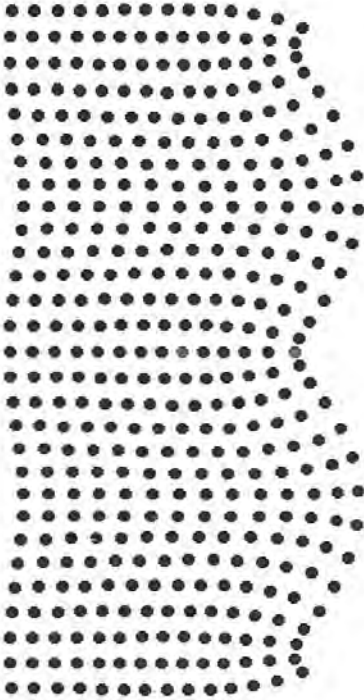


Exhibit 5D

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.

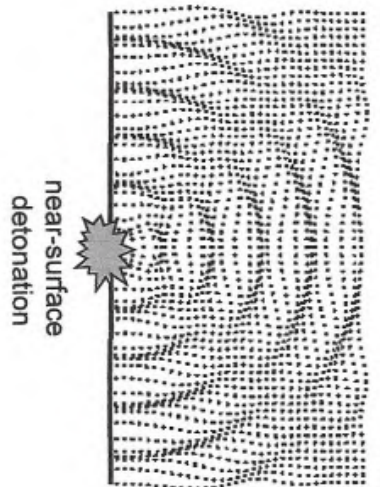
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

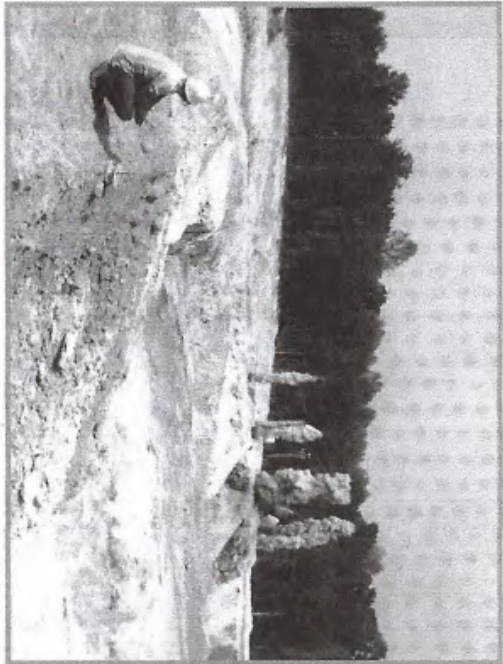
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

Exhibit 5 F

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

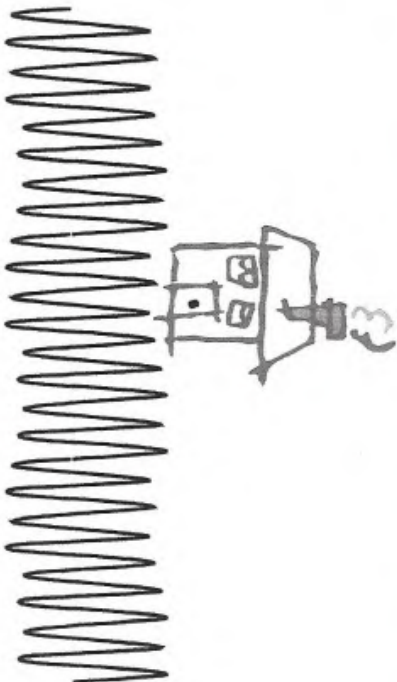
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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 5g



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.

8/4/2019



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A noisy problem - Harvard Health

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LICENSING

Harvard Men's Health Watch

A noisy problem

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

Published: March, 2019



Image: © Juanmonino/Getty Images

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

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

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

Exhibit 7a

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal



(<https://medcenterblog.uvmhealth.org/>)

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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

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal

Exhibit 76

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.

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

Exhibit 8a

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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



Exhibit 8b

8/4/2019

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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).

Exhibit 3

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

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

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

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8/6/2019

<https://knops.co/magazine/noise-and-ptsd/>

Exhibit 9
a



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

Exhibit 9b

8/6/2010

trauma or flashbacks.



Fear

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

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

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

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8/4/2019

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

Exhibit 10a



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

Received 2013 May 14; Accepted 2013 Aug 12.

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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

8/4/2019

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

EXHIBIT 1012

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,

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Walk Donate Q

Exhibit 11a

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

September 5, 2018

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



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

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

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

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

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

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

Where to begin?

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

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

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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.

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Pages

Additional Resources & Tools

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OPINION

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

EXPERT
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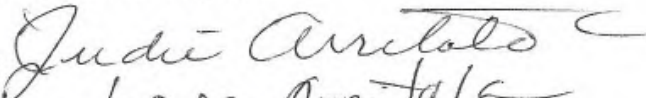


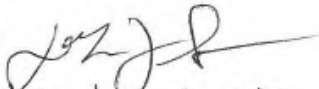
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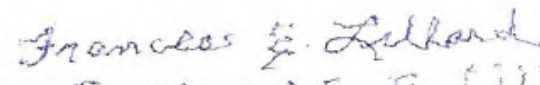
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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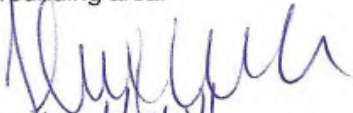
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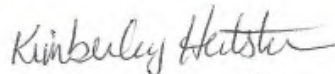
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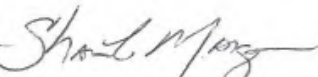
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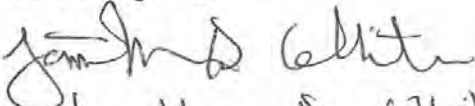
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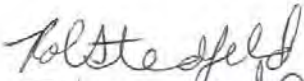
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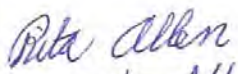
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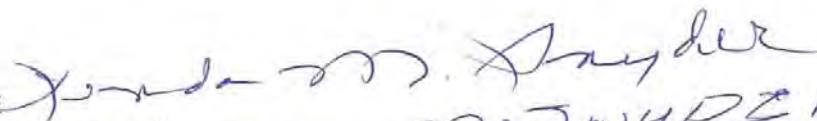
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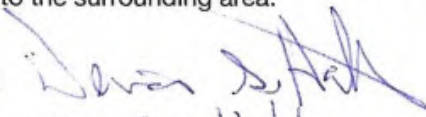
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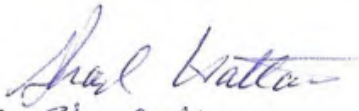
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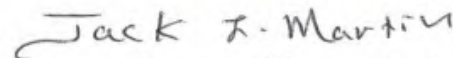
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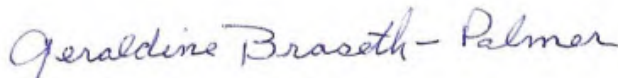
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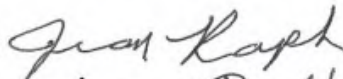
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August 15, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

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

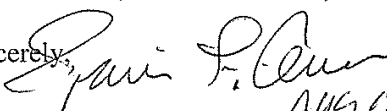
ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such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

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

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

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

Sincerely,


AUG 15, 2019
11:30 AM

Ronnie Allen
410 Balsa St
La Grande, OR 97850

Allen
445 N. Benson
Union, OR, 97883

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Kellen Tardawether
EFSC / ODOE
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97301-253099



Kellen Tardaewether
Senior Siting Analyst
Energy Facility Siting Council
Oregon Department of Energy
550 Capitol St. NE 1st Floor
Salem, Oregon 97301

Dear Ms. Tardaewether:

NOXIOUS WEED COMMENTS

The draft Noxious Weed Management Plan Section B2 of Application does not meet the requirements of the following Administrative Rules which must be addressed prior to the issuance of a Site Certificate for the Boardman to Hemingway Transmission line. The plan must comply with OAR 345-022-0060, Habitat Standard, requiring that the plan not result in infestations of noxious weeds and resulting damage to wildlife habitat; OAR 345-22-0070, Threatened and Endangered Species, requiring the protection of Threatened and Endangered species including the potential for habitat degradation resulting in species reduction, OAR 345-22-0110, Public Services due to the impact of local weed control services being required to address unmanaged infestations of noxious weeds, OAR 345-22-0030, Land Use due to impacts of invasive weeds on all private lands including those designated as farm and/or forest use which would significantly impact farm income and adjacent farm and forest property.

Union County submitted 31 notes and changes required of the Noxious Weed Plan on August 22, 2017. It was as a result of a meeting between the Morrow, Umatilla and Union County weed supervisors and incorporated previous concern of Malheur and Baker county weed supervisors. These comments are submitted due to the need to address each of the changes required to the Noxious Weed Plan.

Following are issues taken from the draft Weed Management Plan which need to be corrected to comply with Oregon state law and/or EFSC rules:

Page B2-2

Idaho Power claims to be only responsible for weeds within Right of Way and up to 50 feet from right of way in Malheur County. IPC claims no responsibility for weeds outside the ROW or those present before the project. Absent 100% assurance that no noxious weeds at the site of the development will be allowed to go to seed, the weeds at the site will disperse to areas outside the ROW.

Idaho Power Management Plan: (B2-13) Problematic statements which are not consistent with the statutes and rules requiring control of noxious weeds.

- Pre construction weed surveys only planned for areas to be disturbed during construction. (Weed surveys also need to occur for areas adjacent to the development as well as control sites to determine if more weed infestations are occurring at locations impacted by the development.)
- Surveys will be completed by the Construction Contractors. (Surveys need to be completed by a third party not impacted by the results.)
- Will document existing infestation of noxious weeds adjacent to the project and adjacent uses that could contribute to proliferation of noxious weeds. (B2-14). (Plan to use this information to avoid responsibility for addressing infestations of these noxious weeds within the ROW in spite of the fact that disrupting habitat will increase the likelihood of infestations which may otherwise not occur. The information needs to be used to determine current conditions and establish whether or not the development has resulted in increased numbers or types of noxious weeds present.)
- IPC claims they are only responsible for controlling new noxious weed populations that are demonstrated to be the result of project construction, operation or maintenance. (i.e. new infestation in an area disturbed by project activities that cannot be attributed to adjacent existing infestations or introduction by a source outside the control of IPC) (Ignores the fact that disruption of the habitat is a major factor in new infestations).
- IPC will not be responsible for control of pre-existing noxious weed populations outside the Project ROW. IPC will not be responsible for noxious weeds introduced by activities other than Project Construction and O&M (eg. Recreational use, grazing, other construction projects, etc) or natural occurrences (eg. Fire, or noxious weeds outside the ROW or any existing access roads not improved by the Project.
(Development, improvement of, and use of roads for access to the area will promote the introduction of and increased occurrence of noxious weed infestations. The development will damage native habitat and will result in ongoing equipment use of the area in the ROW will result in increased weed infestations and the transport of weed varieties from other areas. Habitat impacts for the life of the project will result in opportunities for invasive weed infestations. The developer is responsible for these impacts unless they can document that the impacts of the development were not the cause or a contributing cause of the infestation.
- (B2-15) The developer plans to have vehicle movement outside the right-of-way in pre-designated access, contractor-acquired access, public roads, overland travel routes, or crossings to streams approved by applicable land-management agency or landowner. (The developer is responsible for noxious weed control in any areas where new roads are developed, existing roads are modified by the developer, overland travel routes, including streams crossed. There appears to be a presumption that overland travel outside designated corridors does not

contribute to noxious weed spread. This is categorically incorrect.)

* (B2-20) Noxious weed control efforts will be conducted for 3 to 5 years following construction. Would extend beyond 3-5 years if: disturbed areas are not meeting preconstruction conditions and adjacent land uses are not deemed to be the primary cause of the introduction and/or persistence of noxious weed species within areas disturbed by the Project and/or maintenance activities have caused or contributed to the spread or establishment of noxious weeds. (Disturbed habitat is a primary causal factor of invasive weed infestations. Adjacent land uses will not be a primary causal factor. No matter what the results of the initial years of noxious weed control efforts, the control efforts need to continue for the life of the project. Ongoing maintenance of the transmission line, the use of vehicles in the ROW, access to the area provided by the ROW, etc. will mean that the development will increase the likelihood of invasive weed infestations for the life of the project.)

- (B2-21) IPC will conduct ongoing monitoring and focused control of noxious weed infestations inside of the ROW, as needed, for the life of the BLM ROW and the USFS special-use authorization. (Planning to do this monitoring and control for the life of the project only for areas on BLM or USFS lands)

SOME OF THE PROBLEMS

1. Ongoing monitoring for the life of the project only is done on BLM and USFS land, not private land or state land.
B2-21
2. The construction contractor will develop the final weed management plan and do the surveys. The draft plan included in the application documents that the developer does not intend to comply with state law or administrative rules as noted in the detailed comments received from me and others concerned with this issue. The plan should be developed by a third party contractor not directly impacted by it's requirements.
3. Monitoring of private property does not continue for the life of the project.
4. IPC not taking responsibility for infestations occurring from adjacent lands even though they have disturbed the habitat increasing the opportunities for infestations.
5. IPC not taking responsibility for any infestations which result from increased access to area due to ROW allowing recreational vehicles to access area.
6. IPC not planning monitoring and treatment timeframes that will preclude the dispersal of seeds from the area.
7. IPC is not taking responsibility for weeds dispersed from the transmission line to the adjoining property.

8. IPC providing no control plots to determine if the existence of the transmission line ROW results in more noxious weeds in adjacent private property.

State Statutes and rules:

ORS 569.390 requires the owner or occupant of land containing noxious weeds is responsible for assuring that no noxious weed are permitted to produce seed.

ORS 569.390 states that no machinery shall be moved over any public road without first thoroughly cleaning it.

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 Chapter 35, Division 22 and Division 24.

EFSC does not have the authority to overrule state statutes relating to noxious weed management.

Federal Issues:

Executive Order 13112 (1999) requires Prevent introduction of such species, detect and control such species, monitor population of such species, not authorize, fund, or carry out actions likely to cause the introduction or spread of invasive species in the United States or elsewhere unless the benefits of the action clearly outweigh the harm and the agencies take steps to minimize the harm.

US Department of Agriculture, Forest Service

Invasive species management activities on National Forest System lands shall be conducted according to the following objectives: prevention, early detection and rapid response, control and management, restoration.

BLM Manual 9015 (BLM 1992) BLM must manage noxious weeds and undesirable plants on BLM lands by preventing establishment and spread of new infestations, reducing existing population levels and managing and controlling existing stands.

The above information provides adequate documentation of the problems with increased noxious weed impacts to wildlife habitat, adjacent farm and forest lands, etc. The applicant has not provided a management plan that provides adequate monitoring, management and treatment of the area of impacts of noxious weeds due to the development.

The attached article from the Iowa City Noxious Weed Commissioner provides the cost of failure to address this issue in dollars, loss of biological diversity and land lost to weeds.

Please require the developer to correct the Weed Management Plan to incorporate my concerns as well as those identified by the Counties. These changes are necessary to

comply with requirements of Oregon Statutes as well as the Administrative Rules of
EFSC and other state agencies who are charged with addressing Noxious Weeds.

Sincerely,

Ruby P. Allen
445 N. Benson
Umatilla Co. 97883

541-562-5659

August 14, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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


1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic 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:

Content Anderson

Mailing Address:

409 Sunset
La Grande OR 97850

Email:

betsyanderson1000@gmail.com

Flagstaff is not the only
area I object to. There
multiple other crossings will
affect tourism in our counties
which will receive no benefit
from B2H, just harm



Input on Draft Proposed Order for the Boardman to
Hemingway Transmission Line

<p style="text-align: right;">Page 50</p> <p>1 primitive campsites and a fishing dock. Morgan Lake 2 Park actually contains two lakes. Morgan Lake covers 3 70 acres. 4 The other, Twin Lake, is in plain site within 5 300 feet of Morgan Lake, it covers 27 acres. Twin Lake 6 is undeveloped, a wildlife and bird sanctuary, home to 7 nesting bald eagles. It is designated as protected 8 wetlands. In their application Idaho Power conveniently 9 omits any references to Twin Lake. 10 Page 156 purports to be a map of Morgan Lake 11 Park. According to the map legend the purple crosshatch 12 amoeba-shaped area is Morgan Lake Park. That is wrong. 13 The purple crosshatch is Morgan Lake. The actual 14 boundaries of the 204-acre park are not indicated. And 15 obviously it's difficult to believe "extensive work on 16 this siting study" ever occurred. 17 A specific example of unsupported conclusions: 18 Page 145, Baseline condition, quote: "A goal of minimal 19 development of Morgan Lake Park should be maintained to 20 preserve the maximum natural setting and to encourage 21 solitude, isolation, and limited visibility of users..." 22 Page 146, quote: "The landscape character is 23 natural appearing. Scenic integrity is high as the 24 human developments are harmonious with the landscape." 25 Page 149: "Vegetation will block views of the</p>	<p style="text-align: right;">Page 52</p> <p>1 significant impact." 2 Thank you. 3 HEARING OFFICER WEBSTER: Following 4 Mr. Anderson, we will hear from Jonathan White. 5 MR. JOHN ANDERSON: Thank you. Many of the 6 things I have to say have already been covered. 7 HEARING OFFICER WEBSTER: If you could give 8 your name and your address. 9 MR. JOHN ANDERSON: I'm sorry. John C. 10 Anderson, 409 Sunset Drive, La Grande. 11 Many of the things that I have to say have 12 already been covered quite eloquently, but being short, 13 I will say them anyway. 14 There are many good reasons to abandon Idaho 15 Power's planned B2H power line. Today you may hear 16 testimony regarding economics, geology, eminent domain, 17 view scapes, and many others. 18 I would like to talk about the danger of fire. 19 We know about the Camp Fire and the tragic consequences 20 for Paradise, California. This and other major fires 21 were caused by power lines owned by PG&E. 22 B2H will cross the Blue Mountains west of 23 La Grande through areas of extreme risk of wildfire. 24 This is reckless behavior. 25 In 1973, the Rooster Peak Fire started 6 miles</p>
<p style="text-align: right;">Page 51</p> <p>1 towers from most locations in the park," unquote. 2 In reality, one tower would dominate the 3 entrance to the park, all 130 feet of it in plain view. 4 Within the park, trees bordering the lake are no more 5 than 80 feet high. 130-foot transmission towers will 6 rise more than 50 feet above those trees, dominating the 7 current landscape. 8 Idaho Power simply concludes that the 9 inescapable sight of 500-kV transmission lines and 10 towers around a natural lake setting will have, quote, 11 "no significant impact," on Morgan Lake Park. In 12 research writing this qualifies as wishful thinking. 13 This is the park whose baseline, quote, 14 "should be maintained to preserve the maximum natural 15 setting and to encourage solitude, isolation, and 16 limited visibility of users," unquote, because 50 years 17 ago, no one ever imagined anything larger than a human 18 being might ever intrude. 19 If this application were an airplane, it would 20 have crashed long ago. I urge the Commission to deny 21 this application for a site certificate until each 22 comment submitted at these public meetings and sent to 23 the Commission by July 23rd has been thoroughly analyzed 24 and Idaho Power has provided credible evidence to 25 support each of its conclusions of, quote, "no</p>	<p style="text-align: right;">Page 53</p> <p>1 west of La Grande. When it was discovered it was 2 limited to 1 acre. Days later it had consumed 6,000 3 acres and had burned right up to the hospital's grounds. 4 It could happen again. 5 PG&E and other utilities are shutting down 6 some of their lines during times of high risk. If Idaho 7 Power wisely followed their lead, they would lose the 8 power they say they need during a time of peak demand. 9 Siting a high-voltage line through fire-prone 10 areas is an unacceptable risk to take when this line is 11 not needed. I don't think that Idaho Power has 12 presented plans to mitigate this dangerous situation nor 13 the unforeseen consequences of construction during peak 14 fire season. 15 Please consider the safety of La Grande and 16 its surroundings before you make any decisions. 17 Thank you. My written remarks will follow at 18 a later time. 19 HEARING OFFICER WEBSTER: Thank you. 20 Following Mr. White, we will hear from Susan 21 Badger. 22 MR. JONATHAN WHITE: Jon White, 485 Modelaire 23 Drive, La Grande. 24 My comment is about the blasting that would 25 likely be required during the construction phase of the</p>

~~5/20/14~~

John Anderson

There are many good reasons to abandon Idaho Power's planned B2H powerline. Today you ~~will~~ ^{may} hear testimony regarding economics, geology, eminent domain, viewsapes and many others.

I would like to talk to about the dangers of fire. We know about ~~the tragedy of~~ the Camp Fire and the tragic consequences for Paradise, CA. This and other major fires were caused by powerlines owned by PGE.

B2H will cross the Blue Mts west of LG through areas of extreme risk of wild fire. This is ~~unacceptable~~ ^{reckless behavior}.

In 1973 the Rooster Peak fire started ~~5~~ 6 miles west of LG. When it was discovered it was limited to 1 acre. Days later it had consumed 6,000 acres and had burned right up to the hospital grounds. It could happen again -

PGE and other utilities are shutting down some of their lines during times of high risk. If Idaho Power wisely followed their lead they would lose the power they say they need during a time of peak demand.

Siting a high voltage line through fire prone areas
~~It~~ is an unacceptable risk to take when
this line is not needed. Please consider the safety
of LG and its surroundings before you make any
decisions. Thank you. My written remarks will
follow at a later time.

^{adequate} I don't think ^{just} Idaho Power has presented
plans to mitigate this dangerous situation nor the
unforeseen consequences of construction during peak fire
danger - season

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
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Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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


In summary:

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

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



Signature



Printed Name

Mailing Address:

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Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
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Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

Sincerely

John C Anderson

Name JOHN C Anderson
Address

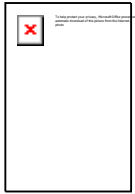
*409 Sunset Dr
La Grande OR
97850*

*The fact that our hospital
was almost destroyed by a
wildfire in 1974 should be
very concerning.*

ESTERSON Sarah * ODOE

From: Lana Anderson <lanajcoke@gmail.com>
Sent: Thursday, August 22, 2019 2:23 PM
To: B2H DPOComments * ODOE
Subject: B2H letter
Attachments: doc00963920190822142232.pdf

--



Lana Anderson
Broker, Blue Summit Realty Group
541-962-5413 | lanajcoke@gmail.com
102 Greenwood La Grande, OR 97850

Create your own [email signature](#)

August 5, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

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

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

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

5.2 La Grande Area Slope Instability

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

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

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

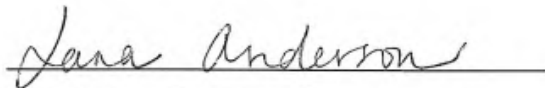
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

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

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

The Council should DENY the request for a site certificate.

Sincerely,

A handwritten signature in cursive script that reads "Lana Anderson". The signature is written in black ink and is positioned above a solid horizontal line.

Name: LANA ANDERSON

Address: 60689 Wood Road
La Grande, OR. 97850

ESTERSON Sarah * ODOE

From: Micah Anderson <micah.anderson4@gmail.com>
Sent: Thursday, August 22, 2019 1:05 PM
To: B2H DPOComments * ODOE
Subject: B2H Comment Submission
Attachments: B2H Micah.pdf

Greetings!

Please find attached as a PDF my written comments in opposition to the Boardman to Hemmingway transmission line. Thank you for reading and considering all comments you receive.

Sincerely,

Micah Anderson
La Grande, OR

August 10, 2019

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

Email: B2H.DPOComments@Oregon.gov

Dear Chair Beyeler and Members of the Council:

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

See OAR 345-021-0010 (1) (T) (A) (B) (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 wildlife and bird sanctuary, home to nesting bald eagles. In their application, Idaho Power omits any references to Twin Lake.

Page 156, (T-4-6) 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."

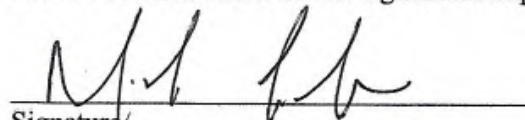
In reality, one tower would dominate the entrance to the park, all 130' in plain view. Within the Park, the trees bordering the lake are no more than 80' high. 130' transmission towers will rise more than 50' above those trees, dominating the current landscape.

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]..."

Morgan Lake has long been a treasure to the local community, and especially to me and my family. My childhood memories of making the short walk from my home on Wood Road to the lake to fish, ice skate, or cross country ski do not include offensive noise of buzzing powerlines, lack of wildlife due to habitat decimation, or the constant worry of wildfire quite literally in my backyard. My hope is that logic will prevail, and my own children—who are blessed to grow up in the same place I did—wont have to rely on how Morgan Lake "used to be."

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



Signature

Micah Anderson
60689 Wood Rd.
La Grande, OR 97850

ESTERSON Sarah * ODOE

From: stephen anderson <anderson.stephen49@gmail.com>
Sent: Wednesday, August 21, 2019 4:15 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power B2H

To whom it may concern, I can't believe that Oregon will again allow another despoilation of our environment at the hands of Idaho Power. It's ironic they can even purpose such an outrage given the wind power and solar energy that will make this project obsolete, and we Oregonians suffer this ill-considered power line. My Great Great Grandfather traveled the Oregon Trail in 1852, so our family has a long history in Oregon. We have not forgotten such debacles as Brownlee Reservoir, which was built before the lawsuits against it made it to court, which effectively ended the salmon and steelhead runs in the upper Snake River, a disaster that cost we Americans uncountable billions in value of those fish. Idaho Power cares not a whit for we the public, or this would never have been given consideration. Please do the right thing and tell Idaho Power this power line does not belong in the great state of Oregon, and for once do what is right for the majority opinion.

ESTERSON Sarah * ODOE

From: Colin Andrew <candrew@eou.edu>
Sent: Wednesday, August 21, 2019 9:30 AM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] EFSC Comment
Attachments: B2H candrew.pdf

To whom it may concern:

Please accept the attached EFSC Comment regarding the proposed B2H transmission line

Sincerely,
Colin Andrew

--
Dr. Colin R. Andrew
Professor of Chemistry
Department of Chemistry & Biochemistry
Eastern Oregon University
La Grande
OR 97850

August 21, 2019

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

Email: B2H.DPOComments@Oregon.gov

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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.

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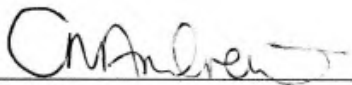
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I urge the Commission to deny this application for a site certificate until each comment submitted and sent to the Commission by August 22 has been thoroughly analyzed, and Idaho Power has provided credible evidence to support each of its conclusions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



Signature

Name: Colin Andrew

Mailing Address: 95 Oak Street, La Grande, OR 97850

ESTERSON Sarah * ODOE

From: Margaret Anolfo <margaretanolfo@gmail.com>
Sent: Sunday, August 18, 2019 12:55 PM
To: B2H DPOComments * ODOE
Subject: The pipeline

This project has not really been run by the local people to get their input. This is a major farming area providing food for our region and nation. We want to be self-sustainable and we don't want outsiders coming in!

ESTERSON Sarah * ODOE

From: Karen Antell <kantell@eou.edu>
Sent: Wednesday, August 21, 2019 4:09 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Idaho Power Site Certificate Application Comments Eastern Oregon University Aug 2019
Attachments: Idaho Power Site Certificate Application Comment Eastern Oregon University Aug 2019.pdf

Please find attached our comments to the Oregon EFSC regarding the Idaho Power application for a Site Certificate for construction of the proposed B2H power line. Our comments are specific to route selection through Union County. Should you have any questions, please don't hesitate to contact me.

Sincerely,

Dr. Karen Antell, PhD
Professor of Biology
Eastern Oregon University
La Grande, OR 97850
541-910-4220 (cell) - preferred until Sep.16, 2019
541-962-3610 (office)



19 August 2019

To:
Energy Facilities 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

From:
Dr. Karen Antell, PhD
Professor of Biology
Eastern Oregon University
One University Blvd.
La Grande, OR 97850
kantell@eou.edu

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemmingway Transmission Project, 9/28/2018; Draft Proposed Order 5/22/2019.

Dear Chair Beyeler and Members of the Council:

On behalf of Eastern Oregon University and myself, I thank you for the opportunity to comment on the Boardman to Hemmingway Transmission Line (B2H) project's application for a Site Certificate. I am Professor of Biology at Eastern Oregon University (EOU), and have been on the faculty since 1987. I am personally and professionally knowledgeable about the biological/ecological qualities of the Glass Mountain area in Union County. I have served as Chair of the Advisory Board of EOU's Rebarrow Research Forest, which is located on Glass Mountain (also known as Glass Hill) in close proximity to both the Proposed Mill Creek Route and the Morgan Lake Alternate Route.

I am writing to express our concerns about B2H project compliance with several of Oregon's Administrative Rules, including those governing Fish and Wildlife Habitat (OAR 635-415), Threatened and Endangered Species (OAR 635-100), Noxious Weeds (OAR 603-052), and Statewide Planning Goal 4, Forest Lands (OAR 660-015-0004 and 660-006-0025). We believe that on the Glass Mountain segment in Union County Oregon, both the Proposed Mill

Creek Route and the Morgan Lake Alternate Route would be in violation of each of these Oregon Administrative Rules. We request that the Oregon EFSC recommend to not authorize the proposed development action on either route in Union County.

Fish and Wildlife Habitat:

According to Exhibit P1-Fish and Wildlife Habitat and Species, in the Amended Preliminary Application for Site Certificate, 65.96% of the project area is on land designated as ODFW Habitat Category 2; 13.45% on land designated Category 3; 4.65% on land designated Category 4; 7.62% on land designated Category 5; and 8.31% on land designated Category 6. This indicates that nearly 80% (79.41%) of the total project will affect lands designated Habitat Categories 2 and 3. On both the Proposed Mill Creek Route and the Morgan Lake Alternate Route, the proportion likely is closer to 100%.

According to OAR 635-415-0025: "Habitat Category 2 is essential habitat for a fish or wildlife species, population, or unique assemblage of species and is limited either on a physiographic province or site-specific basis depending on the individual species, population or unique assemblage." State goals specify that there should be "no net loss of either habitat quantity or quality" through "avoidance of impacts through alternatives to the proposed development action" or through mitigation. Avoidance of impact is always preferable to mitigation.

OAR 635-415-0025 states the following:

(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.**

It is our opinion that neither 635-415-0025(2)(b)(A) or (B) can be achieved. Both the proposed and alternate routes across Glass Mountain contain several areas with habitat qualities that do not occur elsewhere in the region. The unique qualities of this area preclude the possibility that "reliable in-kind, in-proximity habitat mitigation" can be accomplished successfully.

Within the proposed project areas on Glass Mountain, ridge-top springs feed meadows and wetlands (Winn Meadow, Bushnell Meadow, Morgan Lake, Twin Lake) that sustain wildlife throughout the year. These areas harbor state listed species of concern, such as Douglas' Clover (*Trifolium douglasii*), and many other associated uncommon native wetland plants. The geological and hydrological underpinnings that give rise to these springs have not been studied. Construction of B2H towers may irreversibly damage hydrologic resources. It is likely that construction of tower bases along the margins of these wetland areas would have potentially significant adverse effects on the hydrology, resulting in diminished water flow. This loss would be catastrophic to both plants and animals throughout the area.

The corridor of land ranging from Eastern Oregon University's Rebarrow Forest, eastward through Winn Meadow (Joel Rice property), and onto the Ladd Marsh Wildlife Area (ODFW), represents an important pathway for wildlife passage between summer range on the upper elevations of Glass Mountain and winter range on the Grande Ronde Valley below. In addition to ODFW biologists, private landowners on Glass Mtn. (including Eastern Oregon University and Dr. Joel Rice), have worked hard to be good stewards of the ecologically unique habitats on Glass Mtn. At EOU, we have engaged community participation through the Rebarrow Research Forest Community Stewardship Project to promote forest habitat restoration. Disruption of this corridor by the B2H project would create an irreplaceable loss of wildlife habitat. There simply is no way to mitigate for this loss.

As more and more landscape-altering projects are permitted and constructed, we have come to rely increasingly on mitigation for protection of at-risk species and communities, yet, a growing body of scientific evidence shows that mitigation projects cannot guarantee a reasonable level of protection for at-risk native communities. In an evaluation of mitigation project success, the Washington State Department of Ecology concluded that out of twenty-five projects studied, only three were found to be fully successful (Wetland Mitigation Evaluation Study Phase 2: Executive summary, February 2002).

Glass Mountain represents uniquely intact habitat that spans both upper and lower elevation areas utilized by a wide variety of plants and wildlife. In fact, areas of Glass Mountain have been suggested for potential mitigation for other projects, such as the Antelope Ridge wind development, which was permitted, but ultimately not constructed. In other words, if Glass Mountain represents the best remaining habitat of its kind for potential mitigation of other projects, then it would be completely irresponsible for the EFSC to approve damage to this habitat, destroying the last best area for future protection of disappearing ecosystems.

In Table S-3 of the DEIS Executive Summary, Residual Effects on Wildlife, impacts to virtually all wildlife groups are rated as Moderate to High, both for initial and residual impact. Specific impacts include mortality due to bird strikes, noise disturbance, introduction of human presence, disruption of breeding and foraging behavior, habitat loss and modification, fragmentation and loss of connectivity. All of these impacts are difficult to mitigate, especially when the affected area comprises some of the highest quality habitat available in the area. There simply are no good mitigation alternatives for most of this habitat. Therefore:

In concurrence with OAR 635-415-0025, we request that the Oregon EFSC deny the site certificate and recommend to not authorize the proposed development action in Union County (Proposed Mill Creek Route and/or Morgan Lake Alternate Route).

Threatened and Endangered Species:

A review of an article published in the esteemed scientific journal Nature states that: "An estimated million species worldwide could face potential extinction as a result of climate changes predicted to occur in the next 50 years, according to a 2004 report in the scientific journal Nature" (Live Science, <https://www.livescience.com/10575-species-relocated-prevent-extinction.html>; 8/19/2019). Many of these extinctions will take place at lower elevations where the combined effects of reduced water and higher temperatures will result in shrinking of high quality habitat and promotion of invasive species.

OAR 635-100 provides a list of Threatened and Endangered Species in the state of Oregon. At least three listed species occur within the B2H Glass Mtn. project area, *Oncorhynchus tshawytscha*, *Oncorhynchus mykiss*, and *Trifolium douglasii*. Fisheries biologists from the Confederated Tribes of the Umatilla Indian Reservation have documented their concern about anadromous fish on Glass Mtn. Douglas' Clover (*Trifolium douglasii*) occurs within a very limited geographic range. Construction of the Morgan Lake Alternate Route would have significant adverse effects on well-established populations on Glass Mtn., especially in the Winn Meadow area. Additionally, I personally, have documented presence of an adult Columbia Spotted Frog (*Rana luteiventris*) at Morgan Lake, which is a federal Species of Concern and an Oregon state Sensitive species. Because virtually all of Glass Mtn. is privately owned, few biologists have had access to survey for threatened species throughout the area in a systematic process. It is likely that the area still holds some surprises with respect to rare species. Nesting birds and amphibians especially are notoriously reclusive and difficult to document without significant targeted and repeated effort.

In contrast to the better-documented vertebrate species, we know virtually nothing about invertebrate species throughout NE Oregon, especially on Glass Mtn. Biologists have surveyed for a few targeted species of concern on surrounding USFS lands, especially native bees most recently, but biodiversity on the private lands of Glass Mtn. remains largely undocumented.

Mitigation or attempts to relocate rare species to other locations are notoriously highly unsuccessful. Species are rare because they require specific conditions of soil, temperature, moisture, competition, and other criteria. Because of the high quality habitat that currently exists on Glass Mtn., few mitigation options are available that could offset the loss of this habitat. Therefore:

In concurrence with OAR 635-100, we request that the Oregon EFSC deny the site certificate and recommend to not authorize the proposed development action in Union County (Proposed Mill Creek Route and/or Morgan Lake Alternate Route).

Noxious Weeds:

The state of Oregon governs the control of Noxious Weeds through specific state statutes (OAR 603-052). Anyone who has had the day-to-day task of controlling noxious weeds realizes that attempting to prevent spread of these plants becomes an unsustainable and impossible task when confronted with miles of newly disturbed land, such as would occur with B2H site construction, and development and maintenance of access roads.

The B2H project DEIS predicts the impact on noxious weeds as high initially and low residual. The residual impact is very likely underestimated in the DEIS. On-going clearing of vegetation within the project right-of-way and expansion of roads throughout the area will result in continual introduction of invasive species over the long term. Climate change will exacerbate the challenges of controlling invasive species, especially on lower elevation, drier sites.

According to OAR 603-052-1200: "Noxious weeds have been declared a menace to the public welfare (ORS 569.180 and 569.350) because of the environmental and economic degradation that occurs when they become established." Therefore:

In concurrence with OAR 603-052, we request that the Oregon EFSC deny the site certificate and recommend to not authorize the proposed development action in Union County (Proposed Mill Creek Route and/or Morgan Lake Alternate Route).

Statewide Planning Goal 4, Forest Lands:

Union County has zoned the lands of Glass Mountain as Zone 4A, Timber-Grazing Zone. This zone is created under Statewide Planning Goal 4, Forest Lands, which has as its purpose the conservation of forestlands (OAR 660-015-0004 and 660-006-0025). The FEIS states that the greatest disturbance on Glass Mtn. will be to "Mixed Conifer Forest vegetation communities" (p. 3-2177). The routing of the B2H power line across Glass Mountain via either the Proposed Mill Creek Route or the Morgan Lake Alternate Route, would severely affect forest and natural resources. The detrimental effects include soil disturbance and compaction, introduction of invasive species, tree removal, reduced seedling recruitment, interruption of wildlife habitat, and disruption of public enjoyment of natural forest ecosystems for recreation, hunting, bird watching, and other activities.

Disruption of public enjoyment of Oregon's protected Forest Lands would be especially severe along the Morgan Lake Alternate Route with its close proximity to the city of La Grande's Morgan Lake Park. Many residents of La Grande, as well as visitors to the area, enjoy Morgan Lake Park. It represents a uniquely well-preserved natural forest area close to the city limits, providing refuge to a wide variety of birds, both forest species and waterfowl. Because of protection from livestock grazing, it hosts some of the most abundant wildflower populations on Glass Mountain. Presence of a large, new power line within the view shed would have a severe negative impact on the use and enjoyment of the area by the public, and

would be in contradiction to the intent of Oregon's Statewide Planning Goal 4 for Forest Lands. Therefore:

In concurrence with OAR 660-015 and 660-006, we request that the Oregon EFSC deny the site certificate and recommend to not authorize the proposed development action in Union County (Proposed Mill Creek Route and/or Morgan Lake Alternate Route).

In summary, we conclude that in regards to fish and wildlife habitat, threatened species, noxious weeds, and Oregon's statewide planning goals governing use of Zone A4 (Timber-Grazing), construction of the B2H power line along either the Proposed Mill Creek or Morgan Lake Alternate Routes, would be in violation of several Oregon statutes, as outlined above. As a professional biologist, I conclude that the Final Environmental Impact Statement dramatically underestimates the negative impacts to the area in multiple ways. In original planning documents, a third route located to the west of the Morgan Lake Alternate Route was proposed that would avoid many of the ecological problems associated with the two routes which the EFSC is now considering. Both the BLM and the USFS, the public agencies tasked with preserving the public's best interest in siting of a potential new power line, chose that route as their preferred alternative.

The EFSC has, at the core of its mission, the charge to insure that the best interests of all Oregonians are respected and protected, as new energy development projects such as the proposed B2H power line progress through the permitting process. As outlined above, we think there are several important issues regarding protection of forest and wetland habitats on Glass Mountain that have not been adequately addressed in the FEIS and planning process. Therefore:

We urge the Oregon Energy Facility Siting Council to fulfill your responsibility to all Oregonians, both present and future, by denying the site certificate and not authorizing the proposed B2H development action in Union County (Proposed Mill Creek Route and/or Morgan Lake Alternate Route).

Sincerely,



Dr. Karen Antell, Professor of Biology
Eastern Oregon University; Science Office
One University Blvd.
La Grande, OR 97859
kantell@eou.edu
541-962-3610 (office); 541-910-4220 (cell)

August 22, 2019

To: EFFC

Let me preface this letter with, **we do not trust Idaho Power**. You have not operated in good faith or been truthful. You have trespassed on our land without our knowledge and then lied about it. We as well as our neighbors found your markers on our property, you lied and said we had given you permission to enter our land. NOT TRUE!!

We here on Luciani Ranch are 2nd generation farmers with a 3rd and 4th generation on the way. It has always been very important to us to be paramount stewards of the land. We have taken pride in preserving our land for not only our generation, but for the generations of Children and Grandchildren ahead. With our farming operation being dryland, preventing land erosion is of utmost concern. We have put hundreds of thousands of dollars into changing our operation to chem- fallow because of highly erodible land that comes with dryland farming. We have never allowed people to drive onto our range or farmland due to the disruption it causes physically and aesthetically! Most people don't realize that with land erosion comes weeds and land scars that will **never** heal.

Not only do we do all we can to protect our land, we also are stewards for the wildlife habitat, we have placed guzzlers all over our farm to provide water for small wildlife, planted CRP with wildlife food plots to provide for the wildlife, this all helps preserve the land for future generations and once more protects the land from water and wind erosion. We have gone to the expense of raising pheasant's and chucker's with surrogater's, not for hunting, but for building the herd for future generations.

What would be the ramifications of a huge transmission line's going through our property?

- Land erosion
- Irreversible land scaring and damage
- Ongoing traffic for line repair
- Aerial spray applications will be limited for critical late summer sprayings, they will not come within thousands of feet within the towers. How do you control your weed when the plane cannot get within 2000 feet of the towers and it's too dusty to spray with a ground sprayer?
- Drastic land devaluation
- Possibility of more lines to come, taking out more parcels of land which would more than likely run us out of business.

Safety of living and equipment under the lines:

- ❖ possible electrocution from non-grounded equipment
- ❖ Multiple Sclerosis
- ❖ brain cancer
- ❖ childhood and adult leukemia
- ❖ Lou Gehrig's disease (ALS)
- ❖ Alzheimer's disease

- ❖ breast cancer in women and men
- ❖ miscarriage, birth defects, reproductive problems decreased libido
- ❖ fatigue, depression and suicide, diseases
- ❖ Hormonal imbalances
- ❖ Heart disease, neuro-degenerative diseases, sleeping disorder and many others.

All points of information can be verified at <http://emwatch.com/power-line-emf/>

The bottom line, in addition to all the points listed, we love where we live and many years ago chose this life style and at this late point in our lives we have no other options to make a living. Farming is not an easy life or an easy way to make a living before the added complications of your power lines, but it is our way of life. The **only reason** we built our home where it is placed, was because of the majestic view of Mount Adams from our living room window and the views each direction around our home of the beautiful rolling hills, wildlife, blue skylines and billowy clouds, it's all pretty simple stuff but important to us. All these aesthetics would be destroyed should your power line be anywhere physically or within visual view of our property. **WE DO NOT WANT THIS VIEW DESTROYED.** The value of our property would be diminished significantly if your power lines were to be near, on or visual from anywhere on our property. **We do not want and will not allow the Boardman to Hemmingway power line to go through or anywhere near our property physically or visually.**

Contrary to the untruth which we have been led to believe, we have since learned that these existing lines **"can be stacked"** on new poles going down the existing corridor of I-84. **To limit environmental disaster, this is our recommendation for your project.** Our pristine farm land and beautiful views are precious and limited, no more can or will be made.

John H Luciani

Karen Luciani

Adam Archer

Rachel Archer

Riley Archer

Jules Archer

July 27, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

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

Table C1: Summary of Proposed Borings; Map Sheet 36

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

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

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

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

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

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

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

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

Conclusion and Requested Relief:

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

I appreciate your consideration and your attention to this matter.

Sincerely,



Signature



Printed Name:

Mailing Address:

References

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

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

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

RECEIVED

AUG 12 2019

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.)

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: 506 Main 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, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

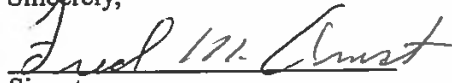
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources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

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

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

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

Sincerely,


Signature

Printed Name:
Mailing Address:

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

August 5, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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

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

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

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

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

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

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

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

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

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

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

Sincerely,

Fred M. Aunst

Name: Fred M. Aunst

Address: 506 Main

LaGrande, OR 97850

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

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

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

Mailing Address: 506 Main LaGrande 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

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Sincerely,

Phyllis J Arnst

Name: *Phyllis J Arnst*

Address: *506 Main Ave
LaGrande OR 97850*

August 2, 2019

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

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

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

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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.

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.

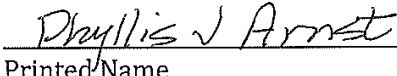
In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

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: 506 Main Ave
LaGrande OR 97850

July 27, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

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

Table C1: Summary of Proposed Borings; Map Sheet 36

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

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

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

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

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

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

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

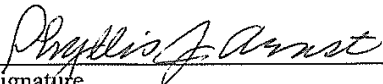
The area surrounding the drill site **95/3 and 95/4** is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

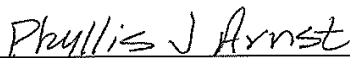
Conclusion and Requested Relief:

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

I appreciate your consideration and your attention to this matter.

Sincerely,


Signature


Printed Name:

Mailing Address: *506 Main Ave
Wagwande OR 97850*

References

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

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

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

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

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

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

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

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

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

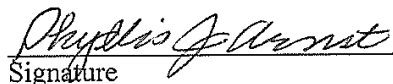
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources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

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

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

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

Sincerely,


Signature

Printed Name: *Phyllis J Arnst*
Mailing Address: *506 Main Ave
LaGrande OR 97653*

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT
PROPOSED ORDER

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


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

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

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

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

Sincerely,


Signature

Printed Name: Phyllis J Arnst

Mailing Address: 506 Main Ave
LaGrande OR 97850

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

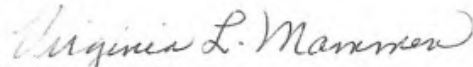
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,



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

gmammen@eoni.com

Exhibit 1

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

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit 2

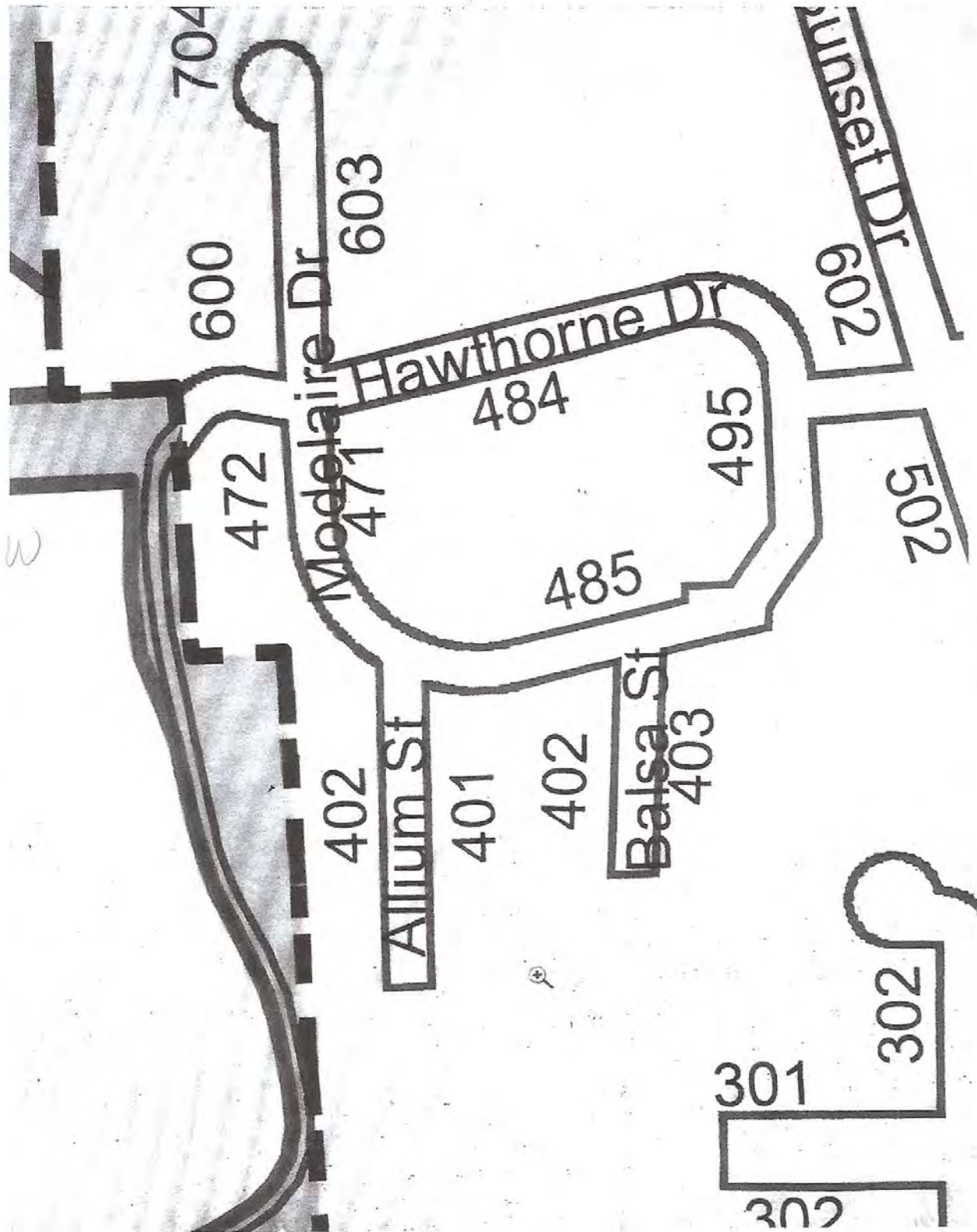


Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

7/25/2019

Gmail - Modelaire Roadway Specifications

Exhibit 6



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



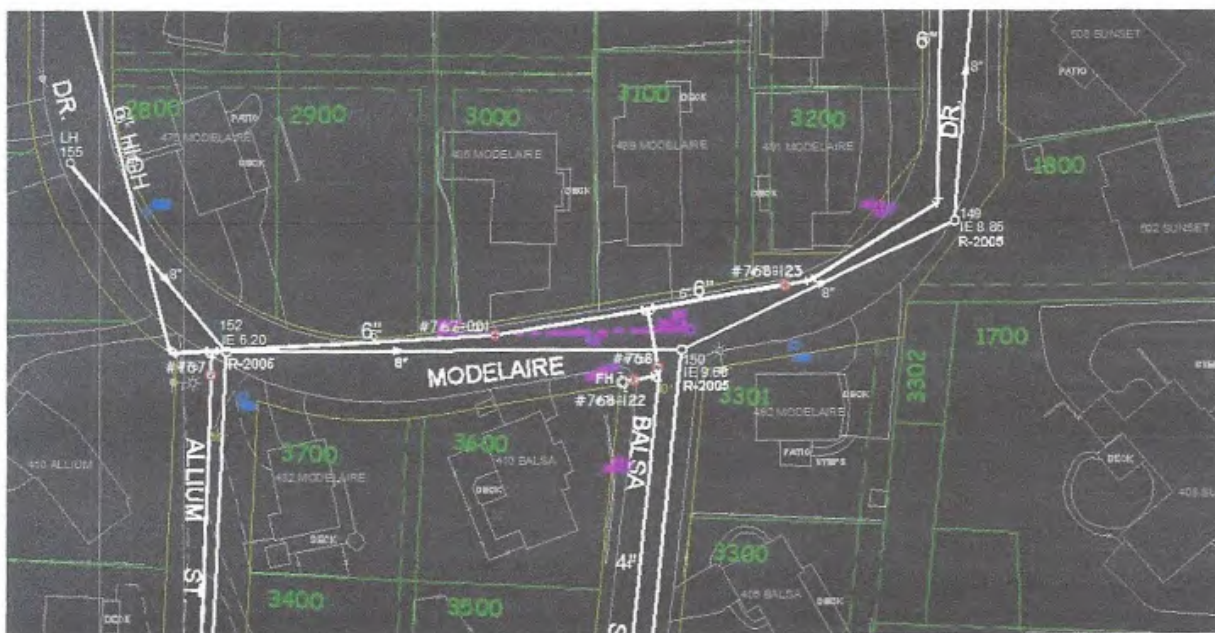
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

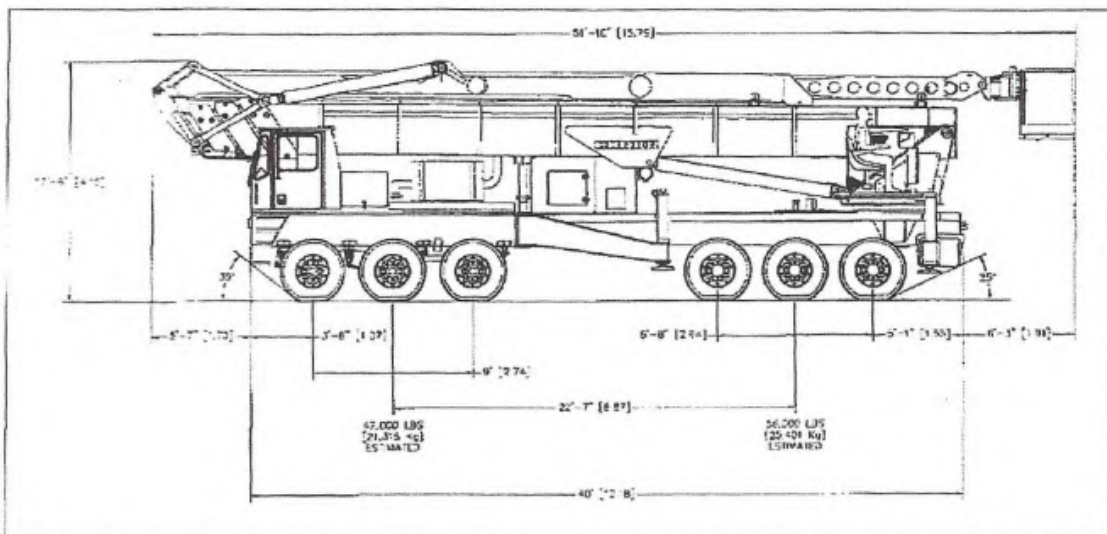


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Exhibit 12

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

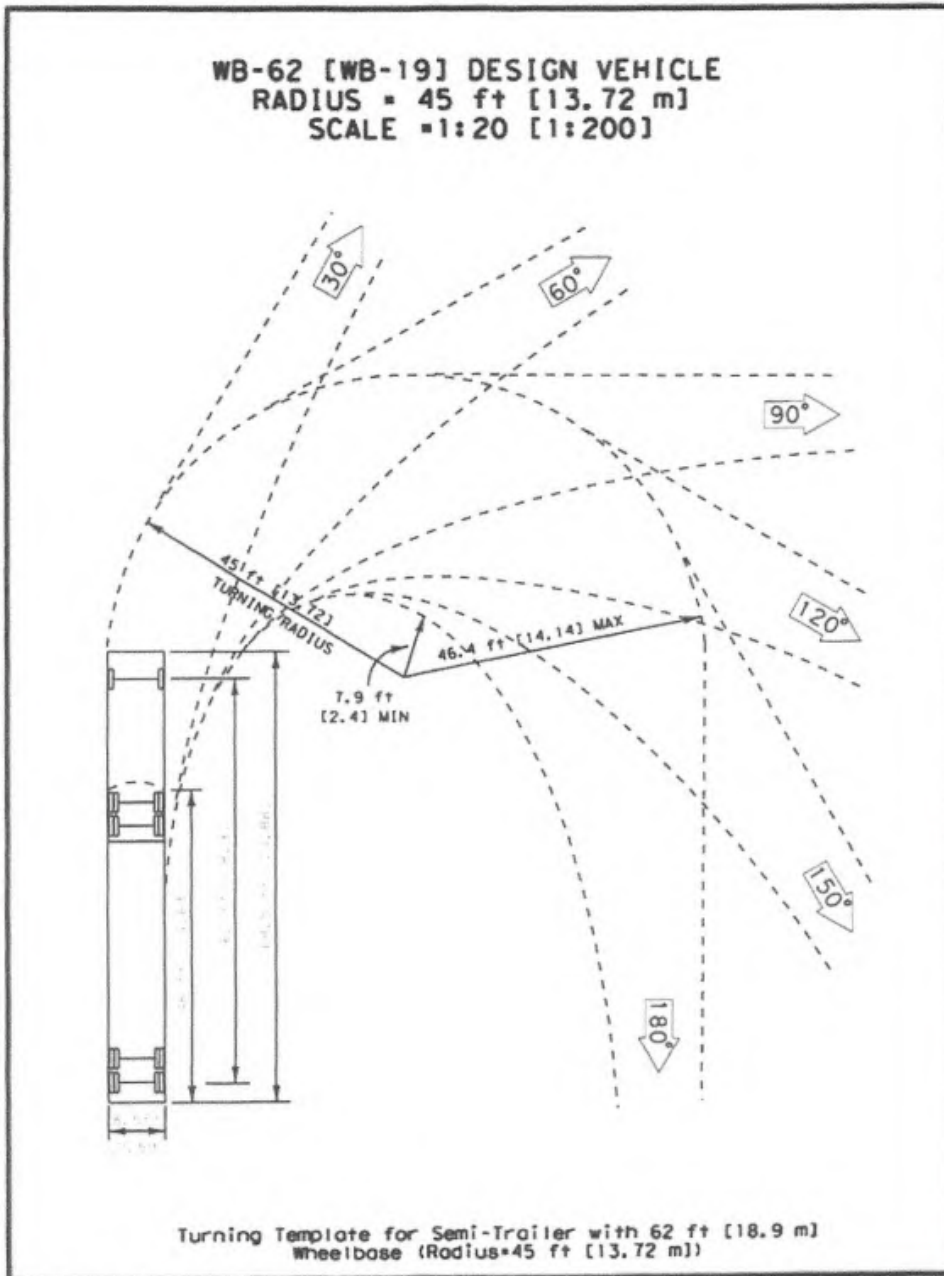


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

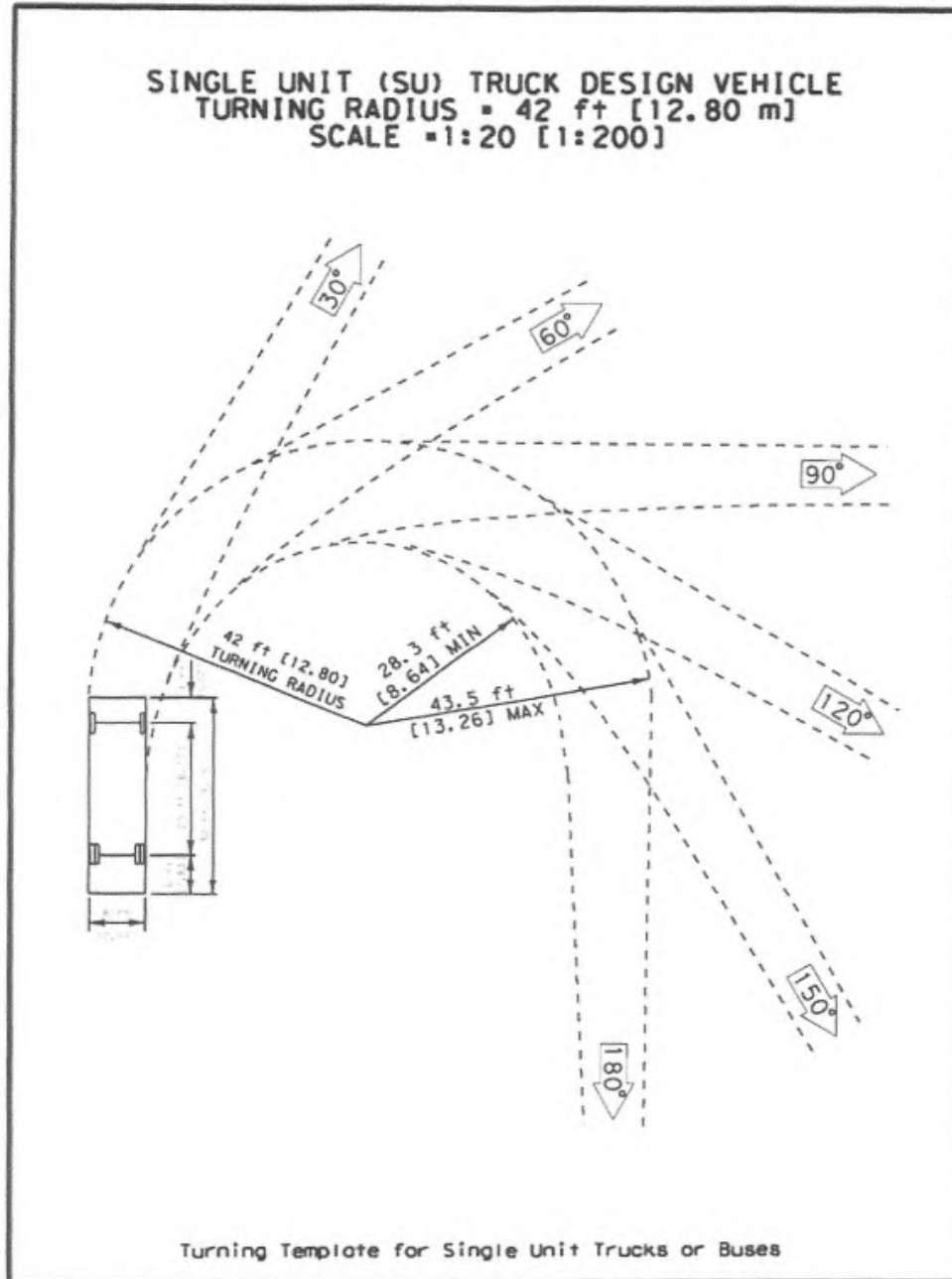


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

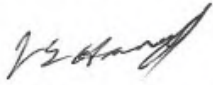
Section 17. TRUCK ROUTES

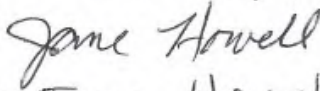
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

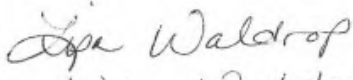
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

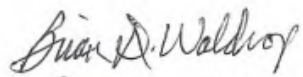
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

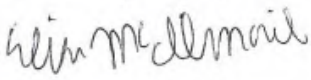
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
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SIGNATURE 
PRINTED NAME Jane Howell
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EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
ADDRESS 475 MODELAIRES DR.
EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRES DR.
EMAIL mcilmail115@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850
jessiehuxell@live.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

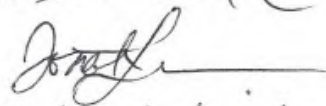

Chris Huxell
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CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

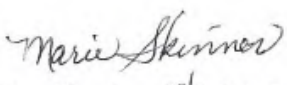

Jonah Lindeman
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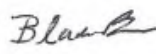

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

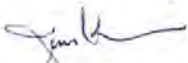
ADDRESS


EMAIL

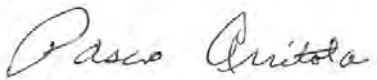

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

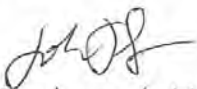
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SIGNATURE 
PRINTED NAME Dale Mammen
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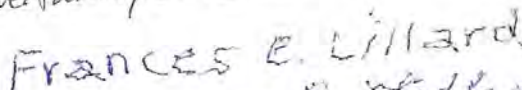
SIGNATURE 
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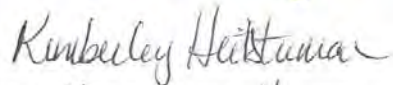
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SIGNATURE 
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ADDRESS 486 Hawthorne DR, La Grande
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PRINTED NAME Frances E. Lillard
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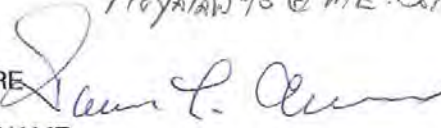
SIGNATURE 
PRINTED NAME Brent H. Smith
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EMAIL smithbrent@gmail.com

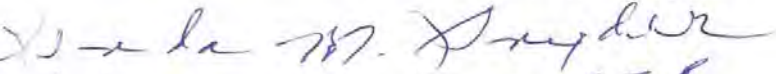
SIGNATURE 
PRINTED NAME M. Jeannette Smith
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EMAIL jeannetterampton@gmail.com

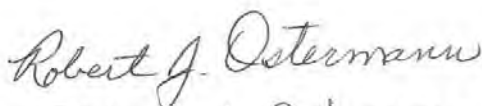
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL Kimheitstuman@hotmail.com


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PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

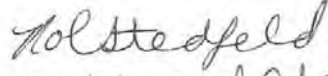
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PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

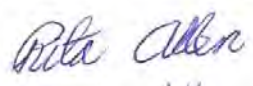
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

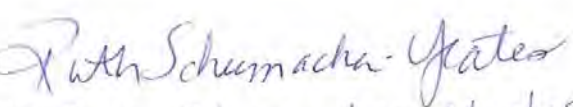
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

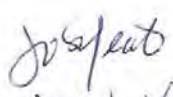
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

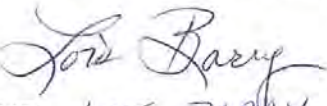
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

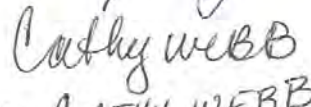
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

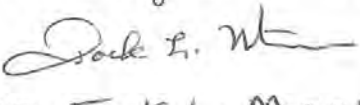
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

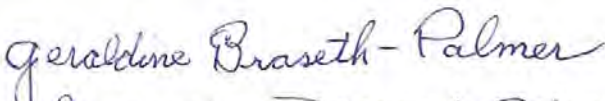

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

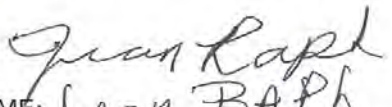
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

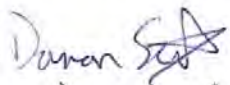
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

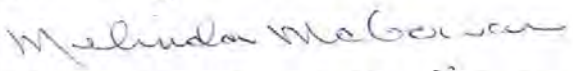
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 Goldenest Drive LA GRANDE, Ore 97850
EMAIL 


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

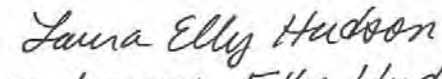
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SIGNATURE 
PRINTED NAME Damon Sexton
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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EMAIL 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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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL v1wd1910@gmail.com

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

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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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, LaGrande, Or. 97850
EMAIL asherei@frontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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EMAIL hnull@comi.com

SIGNATURE *Bert R. Freewing*
PRINTED NAME Bert R. Freewing
ADDRESS 709 South 12th Street LaGrande, OR 97850
EMAIL jeanfreewing@gmail.com

SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay 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 2009 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*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Belketer Ln - LaGrande, 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 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
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PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

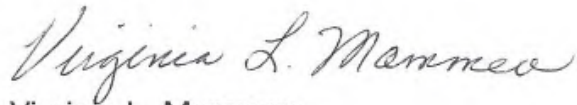
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less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

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

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

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

Sincerely,

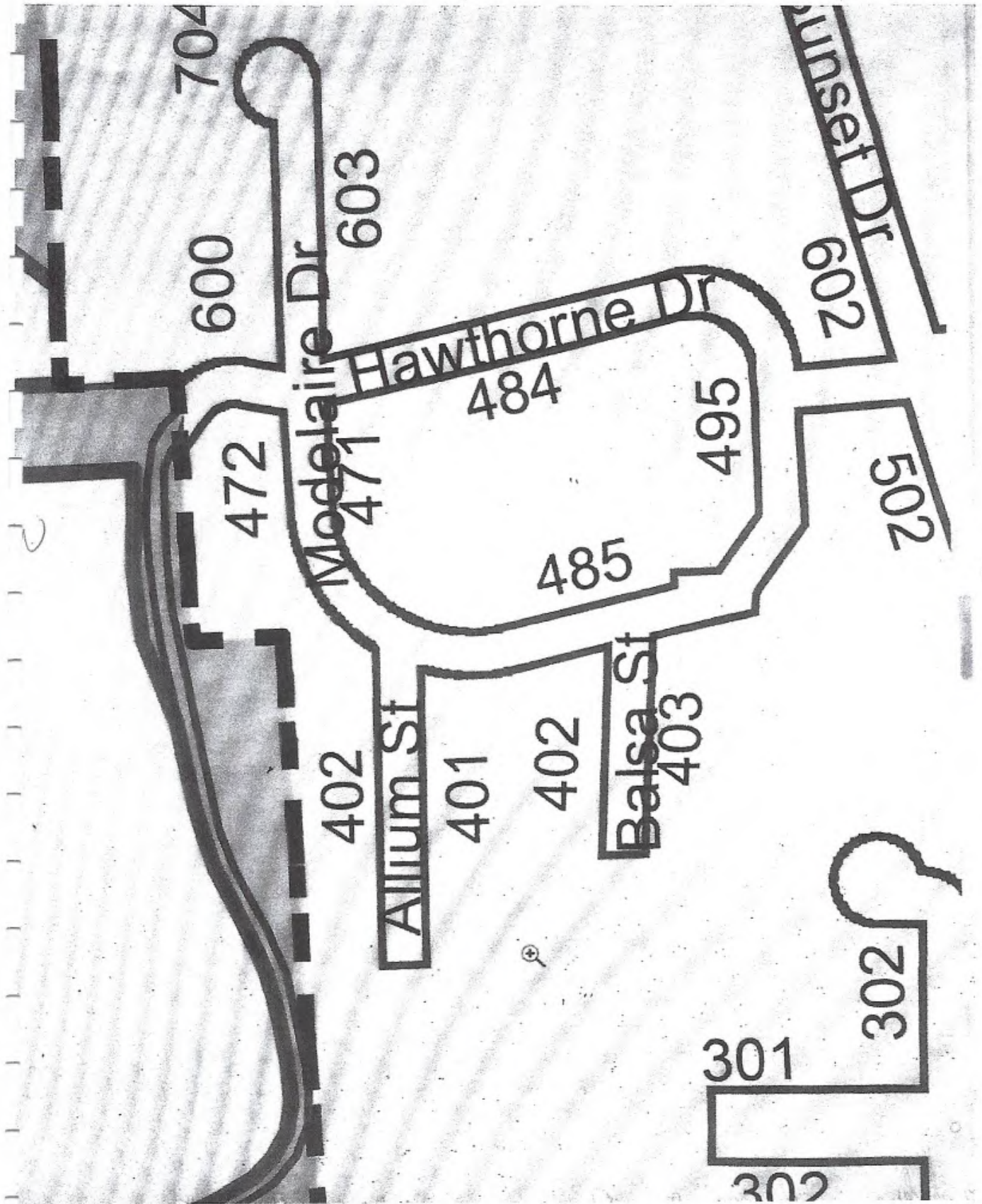


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



2

11

5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

1 **3.3 Predicted Noise Levels**

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

4 **3.3.1 Construction Noise**

5 **3.3.1.1 Predicted Construction Noise Levels**

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

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

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

18 **Blasting and Rock Breaking**

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

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.

34 **Implosive Devices**

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

Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



8/5/2019

Oregon Secretary of State Administrative Rules

Exhibit 4a

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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.

Exhibit 4b

8/5/2019

Oregon Secretary of State Administrative Rules

(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;

Exhibit 5a

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.

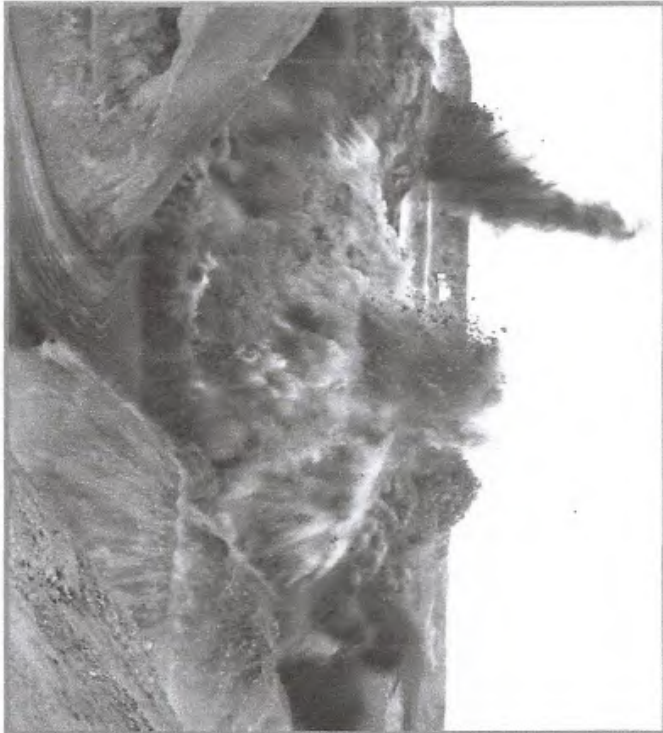
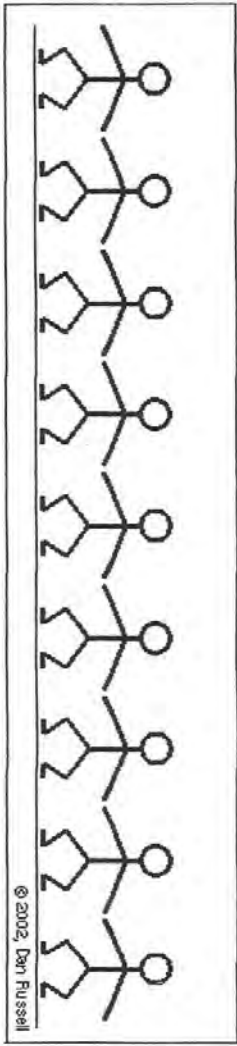


Exhibit 5b

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.



Exhibit 5g

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

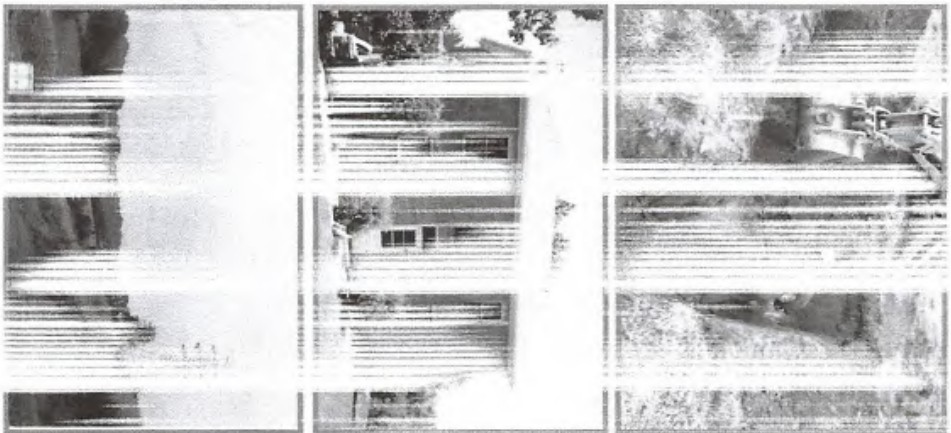
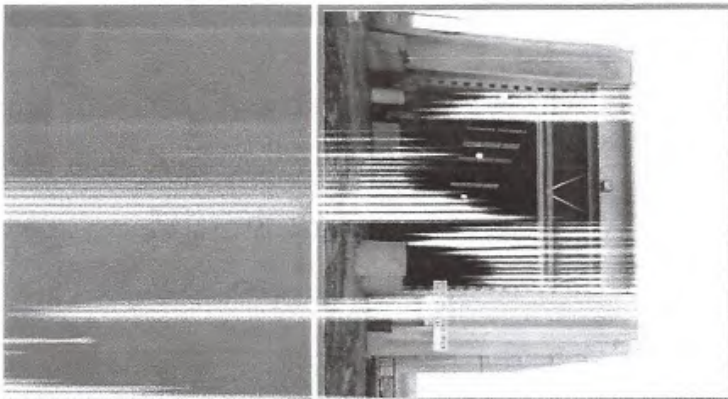
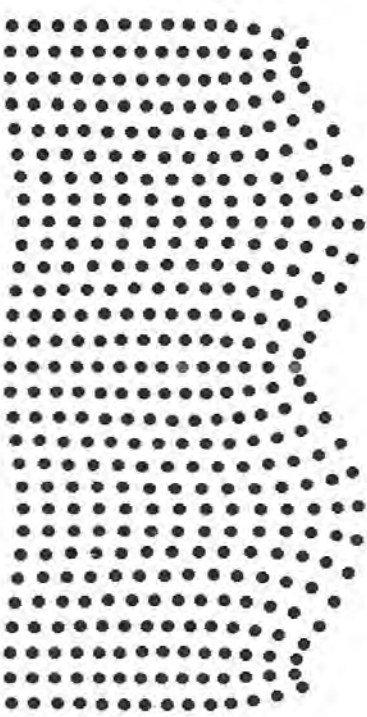


Exhibit 5D

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.



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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.

Structure Response

Exhibit 5 F

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

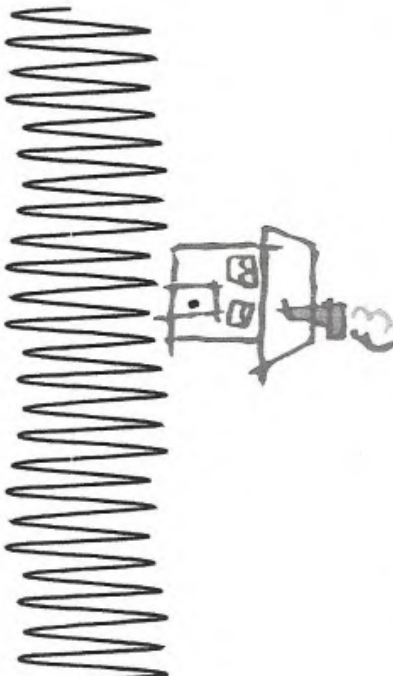
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

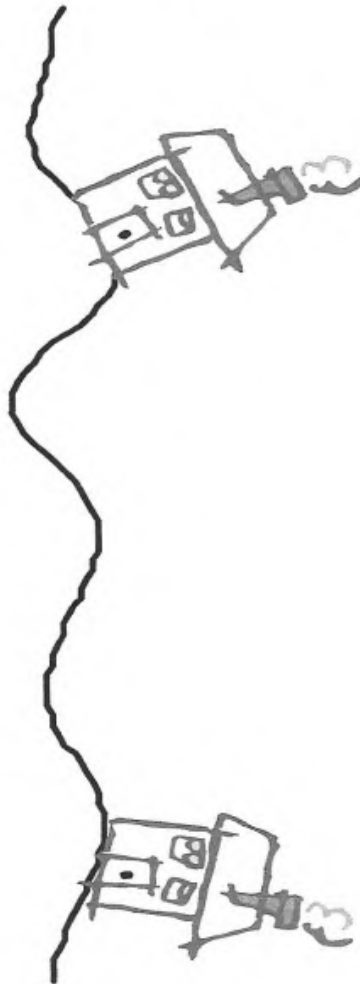


Ground Vibration Structure Response

Exhibit 5g



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.

8/4/2019



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A noisy problem - Harvard Health

Exhibit 16
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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."

Exhibit 7a

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal



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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

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal

Exhibit 76

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.

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

Exhibit 8a

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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



Exhibit 8b

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

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).

Exhibit 3

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

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

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8/6/2019

<https://knops.co/magazine/noise-and-ptsd/>

Exhibit 9
a



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

Exhibit 9b

8/6/2010

trauma or flashbacks.



Fear

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

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

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

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8/4/2019

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

Exhibit 10a



Front Psychol. 2013; 4: 578.

PMCID: PMC3757288

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

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

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

Received 2013 May 14; Accepted 2013 Aug 12.

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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

8/4/2019

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

EXHIBIT 1012

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,

8/4/2018



Walk Donate Q

Exhibit 11a

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

September 5, 2018

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



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

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

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

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

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

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

Where to begin?

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

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

8/4/2011

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.

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Pages

Additional Resources & Tools

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[Parents Seek Help for Son with Autism and Recurring Behavioral Crises](#)

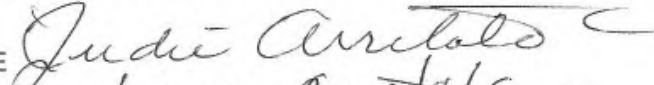


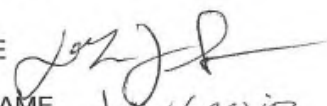
SCIENCE
NEWS


EXPERT
OPINION

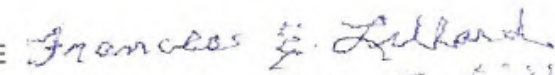
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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

SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Madeline LaGrande OR
EMAIL pjtolac@charter.net

SIGNATURE 
PRINTED NAME JOHN GARLITZ
ADDRESS 484 Hawthorne Dr. LG, OR 97850
EMAIL

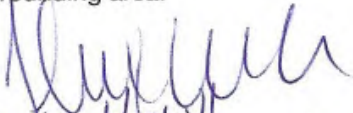
SIGNATURE 
PRINTED NAME Andrea Gulzow
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EMAIL foreverfamily33@ad.com

SIGNATURE 
PRINTED NAME FRANCES E Lillard
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EMAIL

SIGNATURE 
PRINTED NAME C. Huxoll
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Brent H Smith

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PRINTED NAME

M. Jeannette Smith

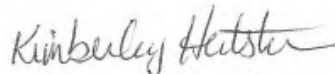
ADDRESS

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EMAIL

jeannettecupton@gmail.com

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PRINTED NAME

KIMBERLEY HETSTUMAN

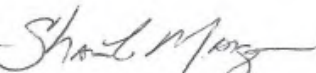
ADDRESS

2409 CENTURY LP, LA GRANDE, OR 97850

EMAIL

kimheitstuman@hotmail.com

SIGNATURE



PRINTED NAME

Shawn K. Mangum

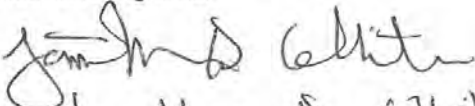
ADDRESS

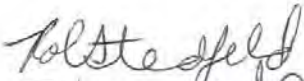
2409 E. M. Ave.


EMAIL

Hoyalaw95@me.com

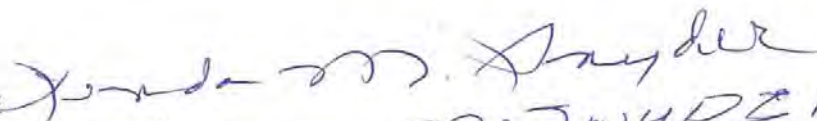
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SIGNATURE 
PRINTED NAME Jonathan D. White
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SIGNATURE 
PRINTED NAME Robin Stedfeld
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EMAIL rstedfeld@yahoo.com

SIGNATURE 
PRINTED NAME Lonnie L. ALLEN 541-963-7720
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EMAIL N/A NONE:

SIGNATURE 
PRINTED NAME Rita Allen
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EMAIL

SIGNATURE 
PRINTED NAME Linda M. SNYDER
ADDRESS 491 17702 E HIRE
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 *Robin J. Ostermann*
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaine Dr La Grande, OR 97850
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SIGNATURE *Robert J. Ostermann*
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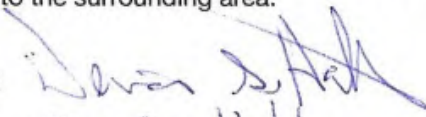
SIGNATURE *John Yeates*
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SIGNATURE



PRINTED NAME

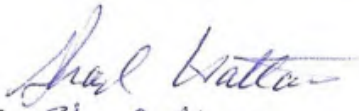
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

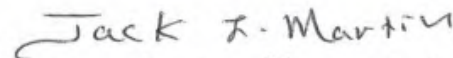
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hattansl88@gmail.com

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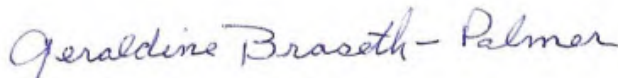
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

GERALDINE BRASETH-PALMER

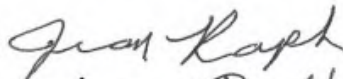
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SIGNATURE



PRINTED NAME

Jean RAPH

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jraph19@gmail.com

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

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SIGNATURE
PRINTED NAME
ADDRESS
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SIGNATURE
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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 *Lois Barry*
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SIGNATURE *JoAnn Marlette*
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EMAIL KeithDhudson@gmail.com

SIGNATURE *Laura Elly Hudson*
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EMAIL ellyhudson@gmail.com

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SIGNATURE *Lynn Wheeler Duncan*
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SIGNATURE *Gary D. Pierson*
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SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
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EMAIL acavinot@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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SIGNATURE *Angela Sherer*
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SIGNATURE *Merle E Comfort*
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SIGNATURE *Robin L. Maille*
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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
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EMAIL

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SIGNATURE *Robert J. Sherer*
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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SIGNATURE *Bert R. Frewing*
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EMAIL jeanfrewing@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

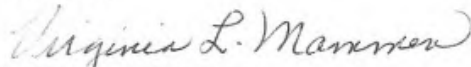
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for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

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

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

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

Sincerely,



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

gmammen@eoni.com

Exhibit 1

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

**TABLE 1
 STREET STANDARDS**

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit 2

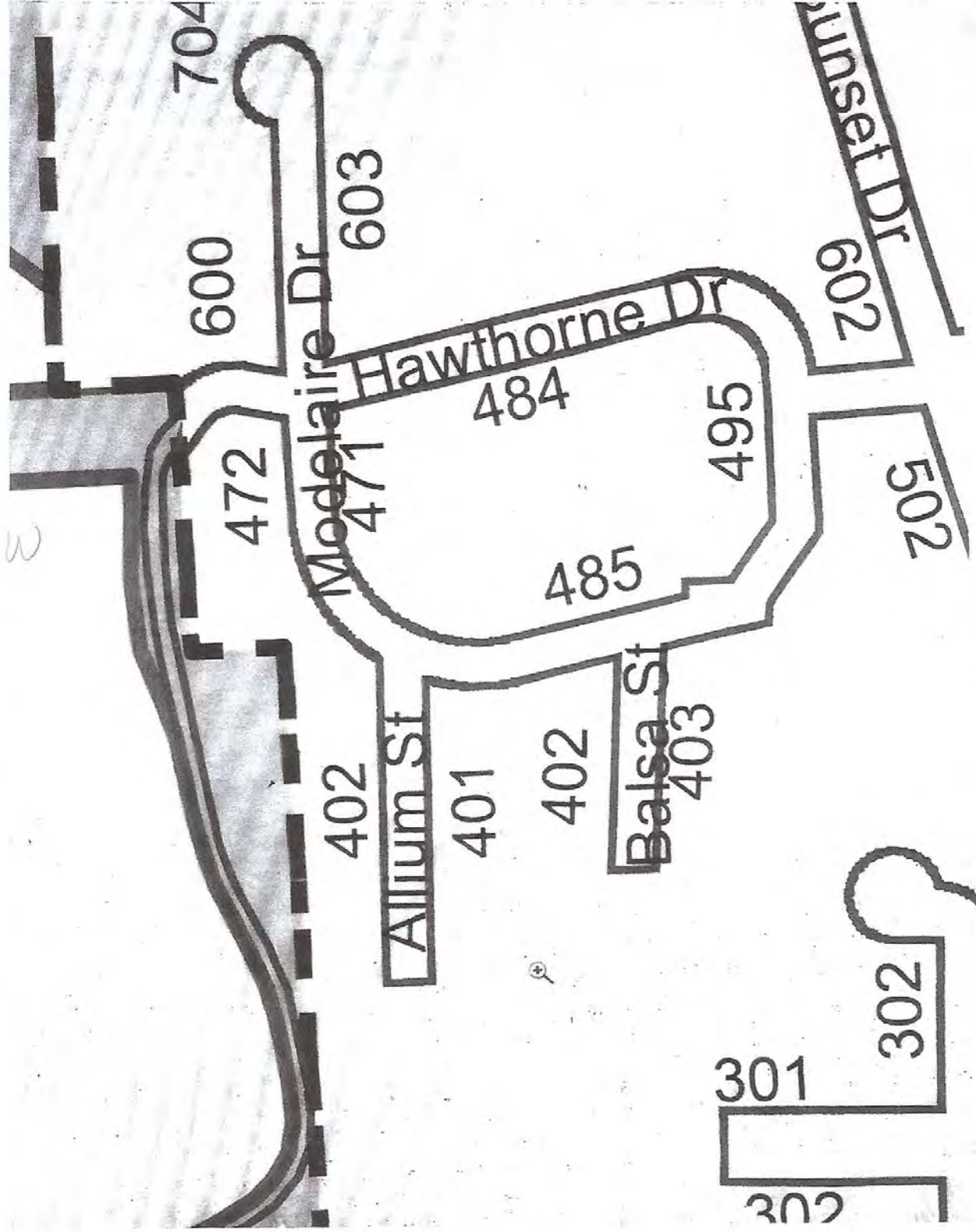


Exhibit 3

Public Services

OAR 345-022-0110

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

Waste Minimization

OAR 345-022-0120

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

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

Need for a Facility

OAR 345-023-0005

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

Specific Standards for Wind Facilities

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

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

Specific Standards for Transmission Lines

OAR 345-024-0090

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



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

7/25/2019

Gmail - Modelaire Roadway Specifications

Exhibit 6



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



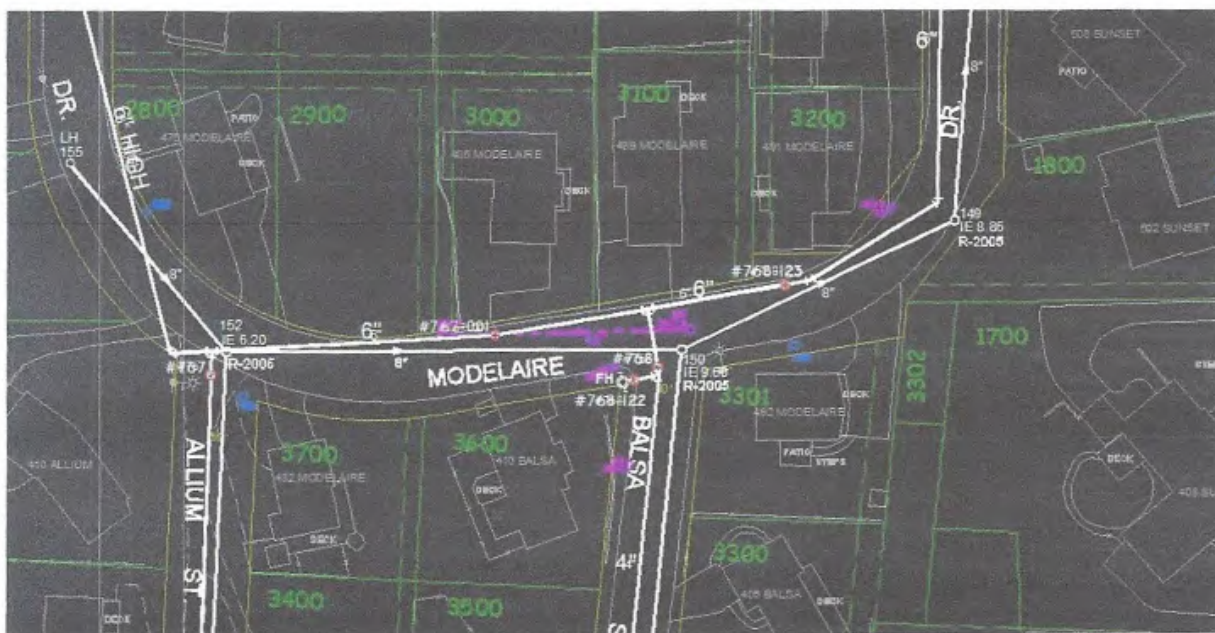
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

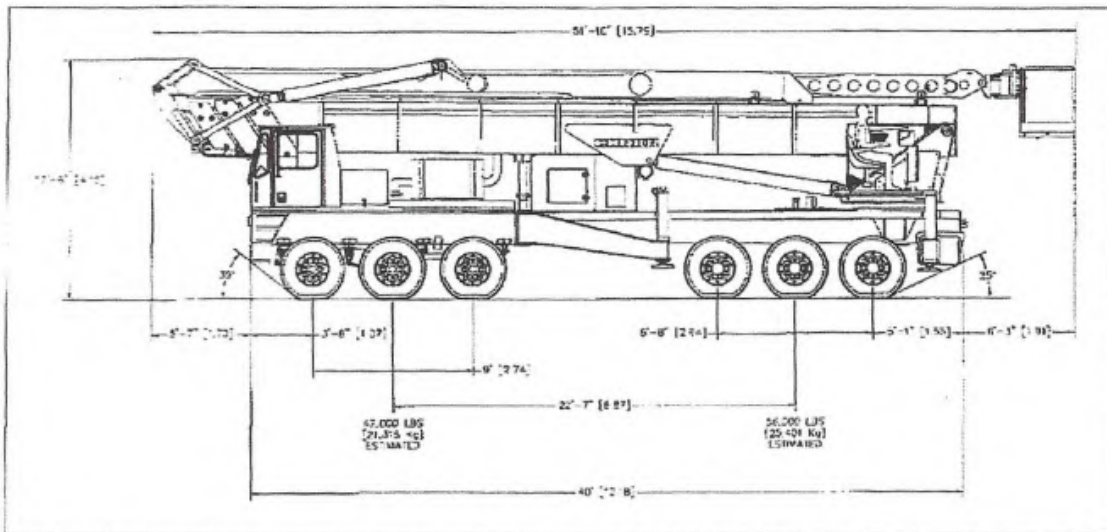


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

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

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

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

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

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

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

A. Advantages

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

B. Disadvantages

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

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

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

Exhibit 12

Table 6. Construction Vehicle Trips per Day per Construction Spread

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

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

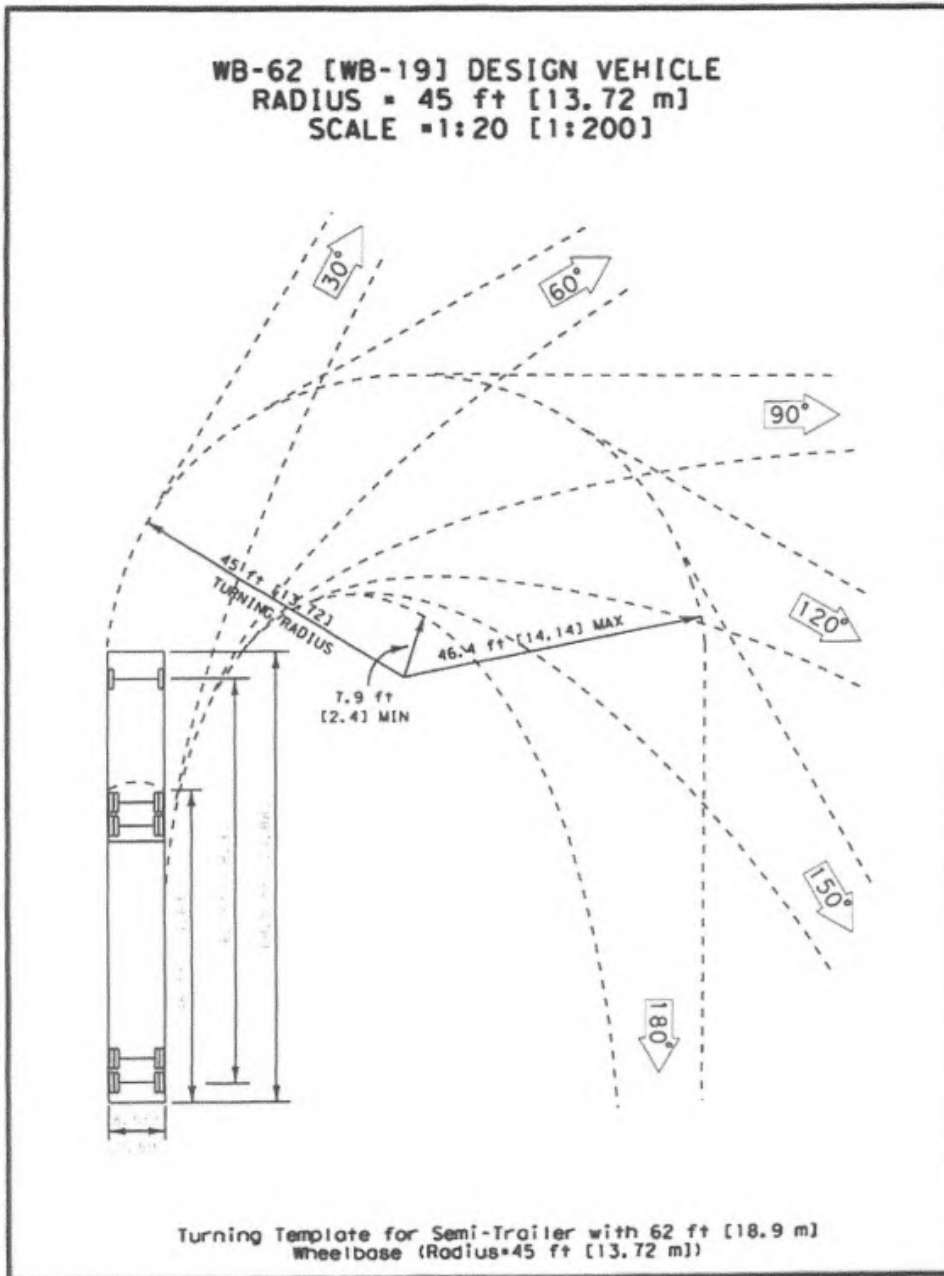


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

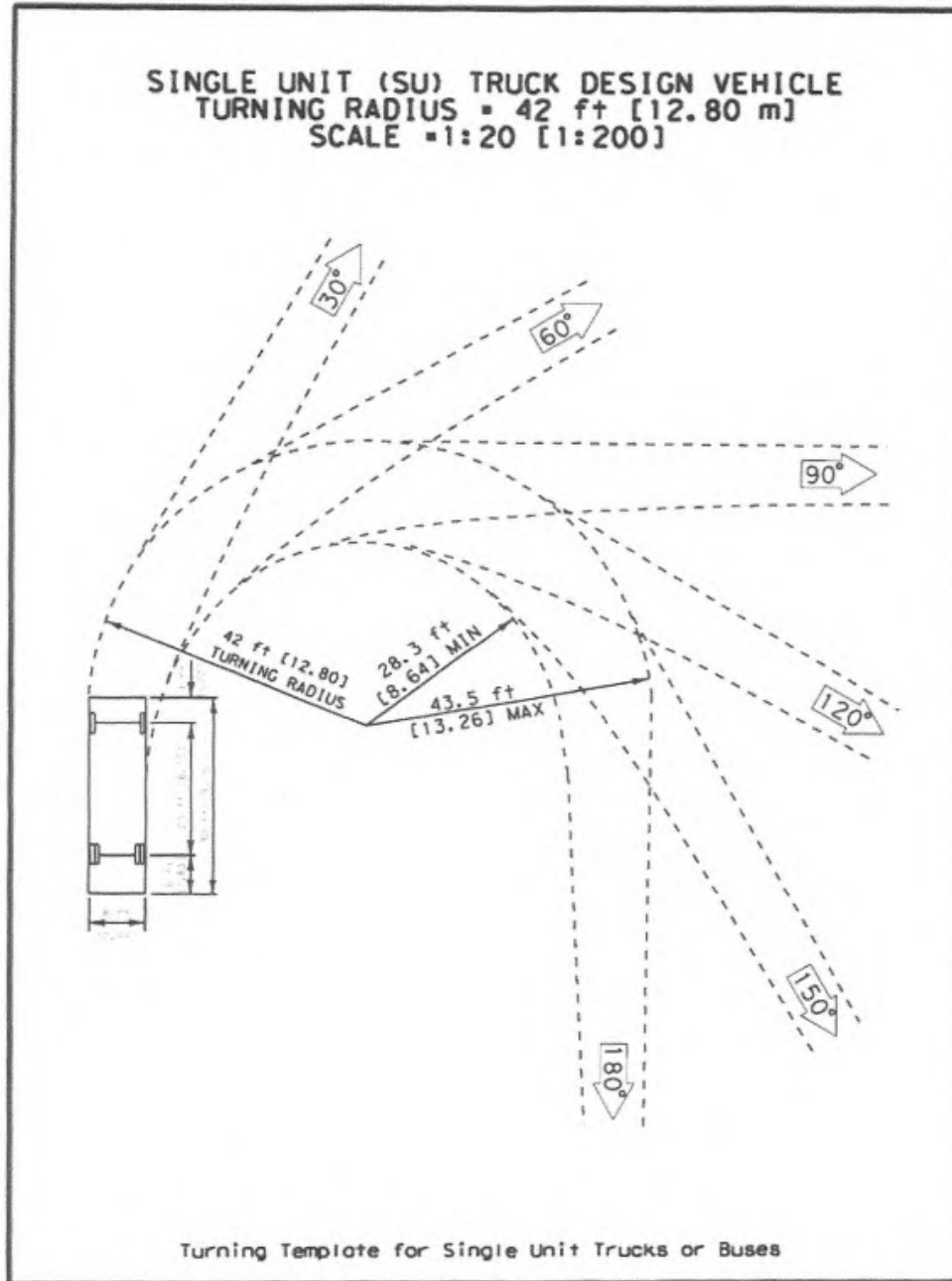


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

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

b. Special Movement Permit

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

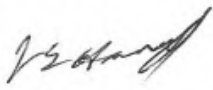
Section 17. TRUCK ROUTES

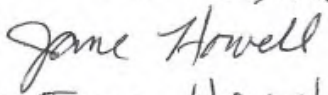
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

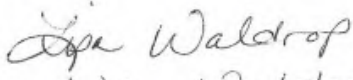
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

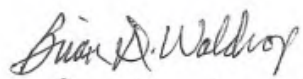
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

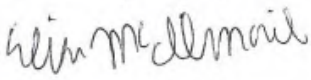
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
ADDRESS 482 Modelaire DR
EMAIL d.janehowell@gmail.com

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 EUSE McILMAIL
ADDRESS 476 MODELAIRE DR.
EMAIL mcilmail154@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

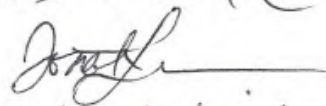

Chris Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

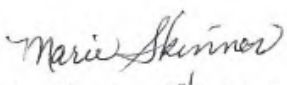

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

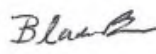

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

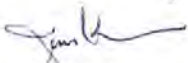
ADDRESS


EMAIL

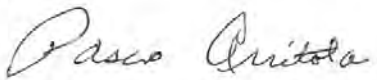

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

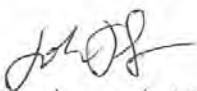
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@comi.com


SIGNATURE 
PRINTED NAME Jim Kreider
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EMAIL jkreider@campblackdog.org

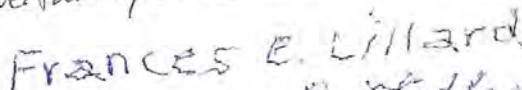
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande, OR
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EMAIL

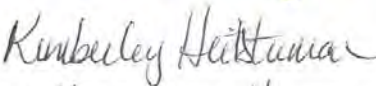
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
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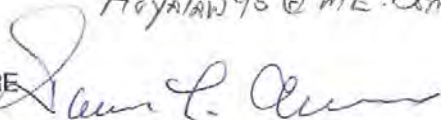
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

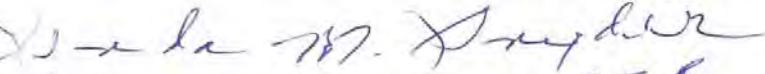
SIGNATURE 
PRINTED NAME M. Jeannette Smith
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EMAIL jeannetterampton@gmail.com

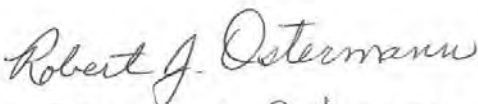
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL Kimheitstuman@hotmail.com


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SIGNATURE: 
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EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

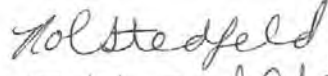
SIGNATURE 
PRINTED NAME Linda Snyder
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EMAIL

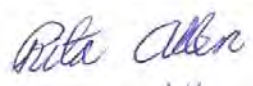
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

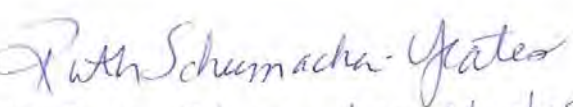
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

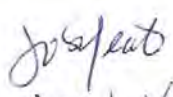
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

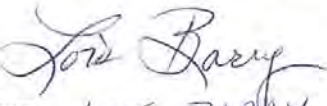
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

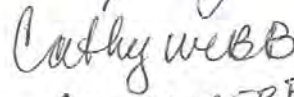
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

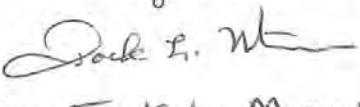
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

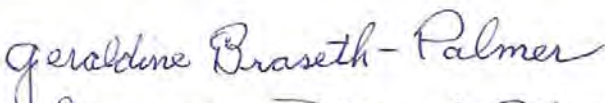

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

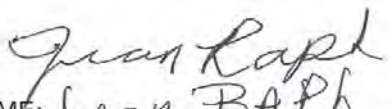
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

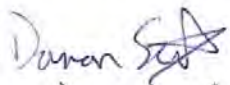
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

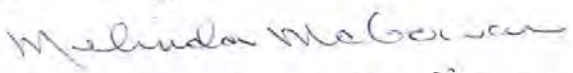
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 BLDENEST DRIVE LA GRANDE, Ore 97850
EMAIL 


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

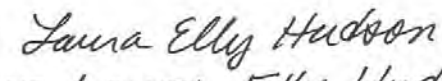
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL Sexton.damon@gmail.com

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

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

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

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

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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 v1wd1910@gmail.com

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

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR
EMAIL joehorst@ecni.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, LaGrande, Or. 97850
EMAIL asherei@frontier.com

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

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

SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay 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 2009 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*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Belketer 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 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
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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) Elizabeth Anbeck

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

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

Today's Date: 6/27/19

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

Page 34

1 communities served along this right-of-way that utilize
2 Bonneville Power Administration energy, will be able to
3 have their rates affected by this in a positive manner.
4 Bonneville will be able to experience the net savings of
5 the energy imbalance market, which is a net benefit to
6 all of the ratepayers in this region.
7 The additional construction of the project, of
8 course, is a time-limiting benefit within the region,
9 but also the construction of the project should also
10 benefit the entire region wherever the work occurs.
11 We have a lot of electrical workers that would
12 be benefited from this kind of construction. Our
13 generation facilities, all of you are familiar with
14 Boardman, the coal plant and the building of the
15 gas-fired plant. Those additional capacities continue
16 to be levied throughout the transmission corridors.
17 I think that's all I'll submit for oral
18 comment. We will be submitting written testimony that
19 outlines some of those benefits with the electrical or
20 the energy imbalance market, as well as some of the
21 other workforce studies throughout the region.
22 Thank you.
23 HEARING OFFICER WEBSTER: Thank you very much.
24 Next up is Brian Doherty.
25 MR. BRIAN DOHERTY: Hello. My name is Brian

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1 Doherty, B-r-i-a-n, D-o-h-e-r-t-y. My address is 70516
2 Highway 207 in Lexington, Oregon.
3 As I said, my name is Brian Doherty. I'm a
4 fourth-generation dryland wheat farmer in central Morrow
5 County. I have five children. My wife Peggy and my son
6 Dan are here with me today.
7 The B2H project will cut a nearly 4-mile swath
8 through our family's farm. My great-grandfather
9 established our farm at Sandhollow in 1885. It's not an
10 easy place to farm and survive economically. And I
11 think some of my neighbors would agree with me on that.
12 Over the years our family has supported
13 development that improved life for everyone in our area.
14 We have over 20 miles of state and county roads cutting
15 through our property. With right-of-ways, that's a lot
16 of land removed from production.
17 There's a substation just above our farmstead
18 and many standard power lines on our property. In
19 addition, there are phone lines, fiberoptic lines, and a
20 gravel borrow pit for the State. Historically we have
21 been very cooperative with these projects for the
22 greater good.
23 I oppose the B2H project coming through my
24 family's property as it is currently proposed. This
25 project will permanently change the landscape and

Page 36

1 usefulness of our property. It will limit the future
2 development opportunities on our property. It will make
3 farming more expensive, less efficient, and our
4 production will be lowered. We can't afford that.
5 We have never been "not my backyard" people,
6 our family. But if you're going to cut a swath through
7 our land 250 feet wide, make the compensation fair.
8 Paying for an easement with a single payment, with the
9 possibility of a judge determining what's fair, doesn't
10 sound like a good deal to us.
11 In 2012, we had the federal government shut
12 down the installation of windmills on our property. I'm
13 not sure we ever got the true explanation of why that
14 was done.
15 In the early 1980s, my father had irrigation
16 that he legally developed on the west side of our
17 property shut down by the State with regulations that
18 came later on the critical groundwater area. This was
19 an economic blow that was very difficult for us to
20 overcome. Forgive us if we have misgivings about what
21 the government will deem fair.
22 I don't believe I have the political or
23 economic clout to stop Idaho Power, PacifiCorp, and BPA.
24 But I would like to propose an ongoing lease payment
25 based on each tower or a portion of receipts from

Page 37

1 wielding costs returned to the landowner based on how
2 many towers are on their land. And I'd like to credit
3 my neighbor Roger Morter for that idea.
4 You can respond that it isn't done this way,
5 but that doesn't mean it can't be. I think most of the
6 landowners would find this more agreeable. We are not
7 opposed to prudent development for the common good. But
8 we are losing more than the land under these towers.
9 My view of the Gleason Butte from my tractor
10 seat will forever be altered. I love that view, I've
11 earned that view. We can work with you, but be fair.
12 Recognize that we are giving up more than an easement
13 here. Compensate us fairly, that's all we ask.
14 Thank you.
15 HEARING OFFICER WEBSTER: Next up is Elizabeth
16 Ashbeck.
17 MS. ELIZABETH ASHBECK: E-l-i-z-a-b-e-t-h,
18 A-s-h-b-e-c-k. Mailing address 71384-A, as in "apple,"
19 Highway 207, Echo, Oregon 97826. The reason why it's in
20 Echo and not Lexington is they won't deliver to where we
21 live. So we go 6 miles to go get our mail.
22 Which is why I'm here. I don't have anything
23 on any studies. I have been in agreement with Sam and
24 Brian both of what they have said. I appreciate your
25 time.

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1 Mine is more of I married a farmer. I'm
2 originally from Portland, but I married a farmer,
3 seventh generation. We have one son, and we hope to be
4 a third generation.
5 Where we put our mobile home, our home where
6 we raised our son, is right, this line goes right behind
7 us. It's on our land and it goes right behind us. We
8 have one of the best views ever, I think per Brian.
9 Where the line is going is my favorite spot. I can see
10 Mount Hood, Mount Adams, and Mount St. Helens on a clear
11 day from our top, right where this line is going. It's
12 where I love to spend our time when it's not in crop, we
13 do crop rotation.
14 My hardest part is if you're not from this
15 area, you might not understand the land and how it
16 works. We border the two men who just spoke. And so
17 when there is a fire from one of these, it will wipe out
18 all of us that are bordering each other. There is no
19 way to stop a fire. We saw that in Morrow in the fires
20 that were along the river this last year. A farmer died
21 trying to put it out with his tractor. So that's very
22 real.
23 The right-of-ways that have been in the first
24 meeting, from the first meeting Idaho Power said they
25 would just condemn our land if we did not agree to this

Page 39

1 process. So from the get-go 10 years ago, it has been
2 stressful, to say the least, to have that be our first
3 meeting here, except for in a different room.
4 So my concern is what was said -- and I didn't
5 get your name, I apologize, and I'm sorry, you just took
6 a bite so I won't... But I spoke with -- we could do
7 comments or questions last time in our meetings here to
8 Idaho Power about once a corridor is open, the
9 possibility of more lines. And as she said, that once a
10 line is open, they won't call it co-locations; it's much
11 easier to do lines down the same corridor. Makes total
12 sense. Didn't you say that? Once there's a line it's
13 easier to go down where a line is. You said
14 co-locations?
15 MS. TARDAEWETHER: Yes, the siting
16 opportunity.
17 MS. ELIZABETH ASHBECK: Siting opportunity.
18 I'm using wrong words.
19 So once there is a line though it's easier to
20 add another line; is that correct?
21 MS. TARDAEWETHER: It depends.
22 MS. ELIZABETH ASHBECK: Yes. Thank you. I
23 know you're shaking your head no.
24 But you see them. I've just taken pictures
25 along -- you can just go out here -- not out here. If

Page 40

1 you go out here, once the lines are open out here they
2 open up. My concern is, we are only one, one house
3 right there on Melville Lane, we're the only one. We
4 were told we were the path of least resistance because
5 we are the only one. I understand that, being a house.
6 So my concern is, is once that line is open
7 and you put in more lines, where does that leave our
8 family farm? I don't have any stats on that. And they
9 can say they don't know, but to me that risk is too
10 high. And so that's really -- I don't know how to make
11 stats on that because once it's opened you can't close
12 it because it's there.
13 So how does that change our way of live and
14 where we live? And we've lived there for the last
15 25 years. They have farmed there a lot longer, but we
16 have lived there for 25 years.
17 And so I do appreciate your time. I know that
18 you probably don't know what the land looks like since
19 you haven't been out there. But I do invite you. You
20 have my address, you can come out and see if you would
21 like.
22 So that's it. Thank you.
23 HEARING OFFICER WEBSTER: Thank you.
24 Next up is Chris Rauch.
25 MR. CHRIS RAUCH: Chris Rauch, C-h-r-i-s,

Page 41

1 R-a-u-c-h. Just like it doesn't sound. Address, 72967
2 Strawberry Lane, Lexington, Oregon. I'm managing
3 partner of North Lex Power And Land. I'm also managing
4 partner and owner of Starvation Farms. And part of this
5 runs right through part of this, or both of us.
6 Wouldn't it be good if this gentleman back
7 here with the maps could have had it up here so these
8 landowners coming up here could have just looked at it?
9 It would have helped somewhat.
10 But I want to stress or put my 2 cents in.
11 North Lex Power And Land, its managing partner is pretty
12 much neutral in this project. Starvation Farms' owner,
13 I'm basically neutral. The one concern I would like to
14 see done probably -- I know how some of these things
15 work. If they could have put it right on the property
16 line it would have been less problematic, put it that
17 way, between me and my neighbor or just on my property
18 line because some of it's strictly on ours.
19 Being off to the side is a bit of a concern as
20 a farmer. It does add cost, it's kind of a pain in the
21 ass. I'm being quite honest.
22 The other two concerns is for North Lex Power
23 And Land, and they are actually directed not to you
24 guys. There's like two questions basically directed to
25 Idaho Power. One, on part of this land there's already

August 21, 2019

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

RECEIVED
AUG 22 2019
Department of Energy

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

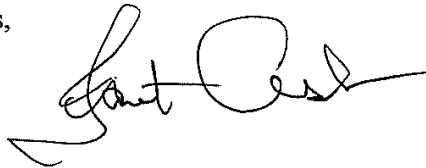
I was informed that there are other routes that exist and/or can be developed without affecting the Public's lives and future.

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

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

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

Regards,



Janet Aston - Home

South Jordan, UT 84009

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

Janet_aston@msn.com

Janet Aston – Land Owner:

2104 Owyhee Lake

Nyssa, OR 97913

ESTERSON Sarah * ODOE

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

Thank you for your time Regards,
Miranda Aston

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

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

August 17, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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

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

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

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

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

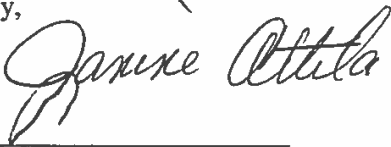
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire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

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

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

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

Sincerely,



Name: *Janine Attila*

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

August 18, 2019

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

Via EMAIL: BEH.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: Janine Attila

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

References

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

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

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

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

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

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

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

August 14, 2019

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

Via E-MAIL: 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: *Janine Attila*

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

Email:

August 18, 2019

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

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

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

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

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

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

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

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

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

land. The applicant has grossly understated the impacts to Union County forest lands and resulting impacts to the economic, social, wildlife and resources of the county.
A site certificate cannot be issued absent information regarding the actual impacts that will occur to this critical local resource.

Sincerely, *Janine Attila*
Janine Attila

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

August 17, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

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

In summary:

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

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

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

August 12, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

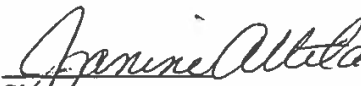
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous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

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

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

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

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


Signature
Printed name: Janine Attila
Mailing address: 603 Hillcrest Dr.
La Grande, OR 97850

Email address:
phone number: (optional)

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

August 17, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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Sincerely, *Janine Attila*
Janine Attila

Name:

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

August 18, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

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

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

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

5.2 La Grande Area Slope Instability

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

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

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

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

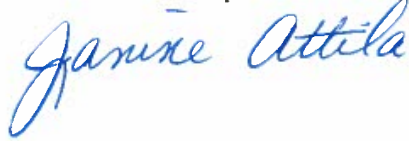
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

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

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

The Council should DENY the request for a site certificate.

Sincerely,



Name:

Janine Attila

Address:

603 Hillcrest Dr.
La Grande, OR. 97850



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) SUSAN BADGER-JAMES

Mailing Address (mandatory) POB 1391

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

Today's Date: June 20 2019

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

TO LATE

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1 B2H line near milepost 106 through 108 of the
 2 IPC-preferred Mill Creek route, and that is where the
 3 line would come closest to La Grande. Although the
 4 application does not specify where blasting will occur,
 5 the applicant's blasting plans state, quote: "Blasting
 6 may be needed in certain areas with rocky terrain to
 7 excavate tower footings, prepare station pads, and to
 8 construct access roads."
 9 The relevant Structural Standard states, in
 10 part: The applicant, through appropriate site-specific
 11 study, has adequately characterized the potential
 12 geological and soils hazards of the site and its
 13 vicinity that could be aggravated by the construction of
 14 the proposed facility.
 15 My impression from reviewing the application
 16 is that the applicant has not fully considered the
 17 impacts of blasting on the nearby unstable slope in a
 18 populated area of La Grande, Oregon. There is map in
 19 the application that shows the B2H line at milepost 106
 20 through 108. That map depicts where the line is about
 21 2,500 feet from a populated "Unconsolidated Sediments"
 22 zone, and then crosses a, quote, "Landslide Deposits"
 23 zone near milepost 108.
 24 The application also mentions in text, slope
 25 instability in a small part. Quote: "One of the

Page 55

1 landslides intersects the IPC proposed routed between
 2 towers 160/3 and 106/4. Based on review of the
 3 topography and aerial photographs, this mapped landslide
 4 may impact the proposed work areas around tower 160/4.
 5 A field reconnaissance of this area should be performed
 6 as part of the geotechnical exploration program,"
 7 unquote.
 8 My concern is more about the construction
 9 process than about the integrity of the towers after
 10 construction. The application identifies the problem in
 11 general but provides no detail about the blasting or the
 12 potential effects on nearby houses in an area that the
 13 City of La Grande designates as a, quote, "Geologic
 14 Hazard Zone," unquote. We know that each tower footing
 15 will require a hole 30 to 50 feet deep, and that the
 16 bedrock underneath the line on milepost 106 to 108 will
 17 almost certainly require blasting for efficient
 18 excavation.
 19 The application does not address this concern,
 20 and the proposed construction is simply too close to a
 21 populated area to mitigate the risk of damage to homes.
 22 The application does not comply with the relevant
 23 standard.
 24 I will include detailed references in my
 25 written comments. Thank you for your consideration.

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1 HEARING OFFICER WEBSTER: Thank you.
 2 MS. SUSAN BADGER-JONES: Thank you. Susan
 3 Badger-Jones, 412 H Avenue, PO Box 1341, La Grande.
 4 While I agree with most of the objections
 5 you'll hear this evening about elements of the
 6 application for site certification, I want to
 7 specifically address portions of the Morgan Lake
 8 Alternative, Exhibit T, page 44.
 9 La Grande has been my home for more than
 10 30 years, and in that time, visiting Morgan Lake Park
 11 has been a weekly, but more likely daily pleasure,
 12 enjoying the wildflowers as they emerge, walk or bird,
 13 exercise my dog, meet friends, gather at a picnic table.
 14 Which brings me to the tower at the park. The
 15 City of La Grande has many well-manicured parks with
 16 playing structures, sports fields, hard scape,
 17 buildings, and professional landscaping. Morgan Lake,
 18 however, has been reserved to experience the natural
 19 world; birds, waterfowl, fishing, camping under the
 20 stars. It's one of the few places around here you can
 21 go to see the sunset. Nesting osprey, cormorants, and
 22 other waterfowl. It's a quiet place; no motors are
 23 allowed on the lake.
 24 Due to the popularity of the park, over the
 25 last few years the City has made improvements to

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1 hosting, maintenance, and campground designation,
 2 supporting that natural experience. A tower is very
 3 much at odds with this.
 4 The application says vegetation will block
 5 views of the proposed tower. It's just not true. Trees
 6 at the proposed site are 70, maybe 80 feet tall, but the
 7 tower 130 feet and basically ugly. The tower will be
 8 highly visible coming and going and from many locations
 9 in the park.
 10 While people may still be able to walk and
 11 boat and camp, the quality of that natural experience
 12 will be very much compromised. "Less than significant
 13 impact" is what the application says. Give me a break.
 14 That brings me to fire. Fire is a constant
 15 danger in a park area, and the proposed tower heightens
 16 that threat. The area is already well familiar with
 17 wildfire and subsequent loss of timber and homes, yet
 18 that risk isn't even addressed.
 19 And then there is the road. The only access
 20 to the staging area and future maintenance is the
 21 county's Morgan Lake Road. It's the only access to town
 22 and emergency services for more than 30 families. You
 23 do the math; 30 homes, 2 drivers each, 2, 4 trips a day,
 24 6 to 7 days a week to work, to school, church, kids,
 25 medical services, and then there are people coming up

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

SEE EXHIBIT C

copy

POB 1341

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

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

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

like to go to

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

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

the application the proposal

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

Water is being cut off from local farmers.

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

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

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

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

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

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

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

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



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Dustin Baker

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

Phone Number (optional) 541 216-9015 Email Address (optional) _____

Today's Date: 06/18/2019

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

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

August 19, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

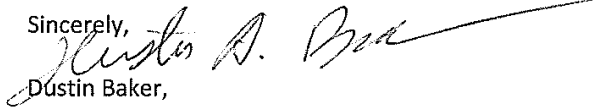
(c) Utility facilities necessary for public service, including wetland waste treatment systems but not including commercial facilities for the purpose of generating electrical power for public use by sale or transmission towers over 200 feet in height.

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

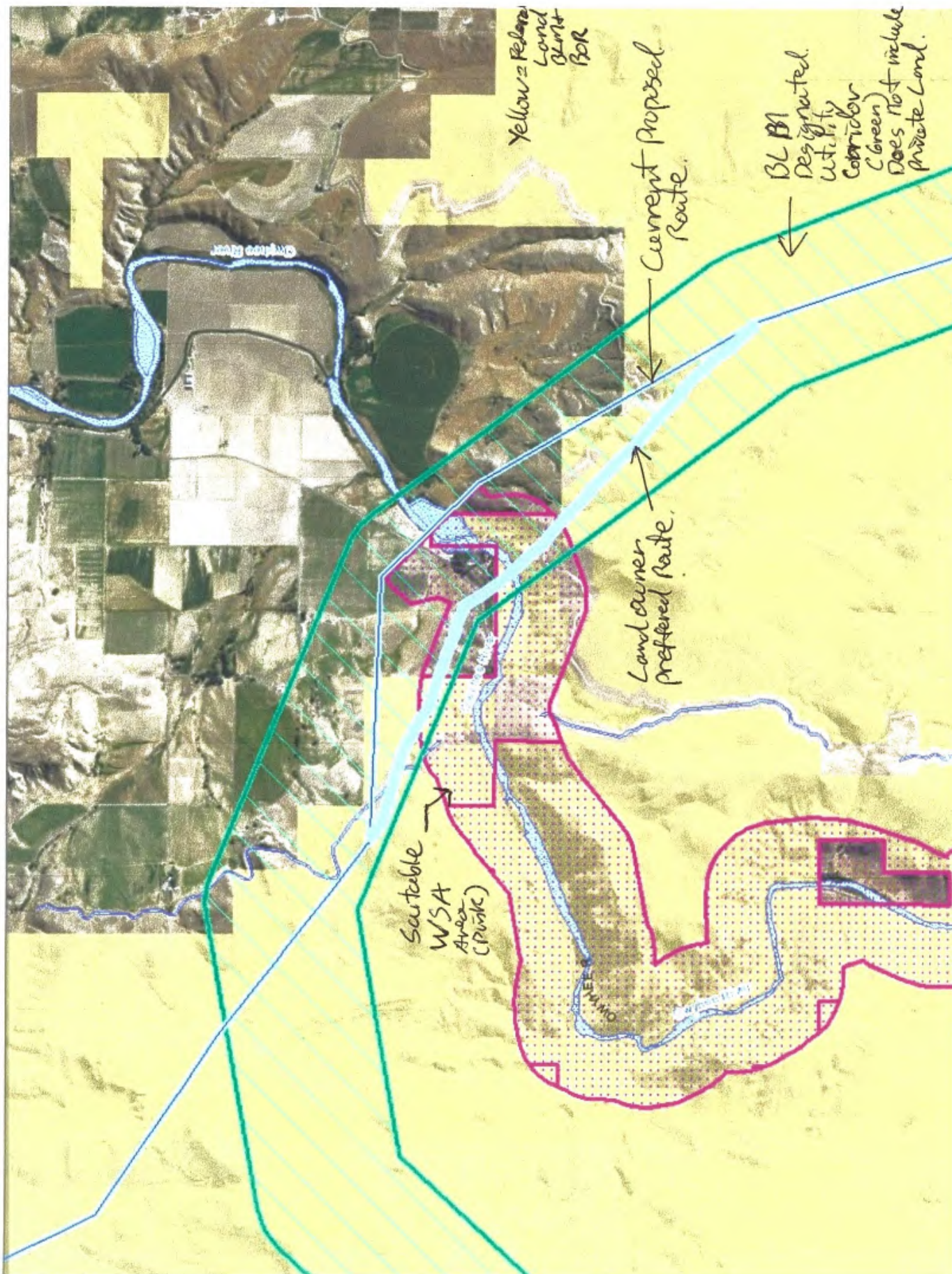
In our meeting with Renee Straub and the Brent Grasty (Planning Director) of the Vale District BLM office, they stated that Idaho Power can still apply to amend their route application with the BLM to stay within the Utility Corridor. This would require the route cross a small portion at the very northern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

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

Sincerely,

A handwritten signature in black ink that reads "Dustin Baker". The signature is written in a cursive style and extends to the right with a long horizontal stroke.

Dustin Baker,
Chaps Land Co. LLC
2340 Rock Springs Canyon Rd.
Nyssa, OR 97913



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.

Southeastern Oregon Resource Management Plan

Land and Realty

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

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

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

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

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

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

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

2) Implement limited retention and consolidation of land in Zone 2, with special emphasis on acquiring land with high and public resource values.

3) Acquire other interests in land, including conservation and scenic easements, to assure efficient administration and improve resource management. Emphasize acquisition of interests in areas with high and public resource values.

4) Make Zone 3 land available for disposal by any authorized method.

Consolidate split-estate where appropriate to improve resource management while protecting resource values.

Southeastern Oregon Resource Management Plan

Rationale The most critical vegetation resources will be protected during the life of this plan. Most current uses will continue without damage to the resources due to the isolation and natural topography. Aggressive control of weeds will assist in preventing future invasions.

Wild and Scenic Rivers

Objective: Protect and enhance outstandingly remarkable values (ORV's) of designated national wild and scenic rivers (NWSR's), and provide interim protection of ORV's of rivers found suitable for inclusion in the NWSRS until Congress acts.

Rationale: The National Wild and Scenic Rivers Act (NWSRA) (Public Law 90-542 and amendments), section 1(b), states that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. Section 5(d) requires Federal agencies to consider potential wild, scenic, and recreational river areas in all planning for the use and development of water and related land resources. Section 10(a) describes the basic management requirement of protecting and enhancing the values that caused the river to be included in the NWSR system. In accordance with BLM policy, all eligible rivers were evaluated for suitability. The planning determination of suitability provides the basis for any decision to recommend legislation. Factors to be considered (see section 4[a] of the NWSRA) in the suitability determination include: the current status of landownership and use in the area; the reasonably foreseeable potential uses of the land and water which will be enhanced, foreclosed, or curtailed if the area were included in the NWSR system, and the values which will

Table 14., Eligible and administratively suitable national wild and scenic study rivers (PSEORMP Table 3-13)

Resource area	River	Miles	Acres ¹	Tentative classification
Malheur,	Dry Creek (M15)	16.8	5,344	Wild
	Owyhee River Below the Dam (M16)	13.5 ²	3,973	Recreational
	North Fork Malheur River (M17)	3.6	996	Wild
Jordan,	Antelope Creek (J19)	8.6	1,448	Wild

¹ Acres based on 0.5-mile-wide corridor (0.25-mile each side), except on Antelope (J19) which is rim to rim.

² Under cooperative study, includes 4.3 river miles of BOR.

³ These rivers have met the suitability criteria and have been determined to be administratively suitable for inclusion in NWSRS

and important values. Increasing human use in the area has created new threats that need to be resolved by active management.

Toppin Creek Butte ACEC/RNA

Description and values The 3,996-acre Toppin Butte ACEC/RNA is located 30 miles north-east of McDermitt, Nevada, and adjacent to the Idaho stateline. The topography includes a gently sloping hill with a rapidly draining soil. Little water has been available for livestock on the Butte, and the topography still limits livestock use on the upper slopes. Two playas at the base of Toppin Butte contain a bare playa community and a silver sagebrush community that have lesser research potential.

The relevant and important values of this ACEC/RNA are the low sagebrush/bluebunch wheatgrass community in excellent condition and low sagebrush/Idaho fescue plant community vegetation cells identified by the ONHP. These plant communities will be specially managed for current and future research. Also identified as relevant and important values are sage grouse and associated habitat for neotropical bird migration.

Portions of two WSA's are located within and comprise 100 percent of the ACEC/RNA. Approximately 152,040 acres of the Owyhee River Canyon WSA (3-195) has been recommended by BLM as suitable for wilderness designation. BLM has recommended Lookout Butte WSA (3-194) as not suitable for wilderness designation. WSA's are currently managed in accordance with BLM's IMPLWR. Under this direction, surface-disturbing activities requiring reclamation are generally precluded from the WSA's until Congress makes a decision on wilderness designation.

The ACEC/RNA includes a portion of one grazing allotment. Due to the presence of road 6350-0-AO and a water development, the playas have been disturbed and have less value for research, but could be used as comparison study plots for less disturbed playas.

The ACEC/RNA has moderate potential for the occurrence of geothermal resources and a low potential for all other leasable and locatable minerals. There is no record with BLM of mining claims within the boundaries of the ACEC/RNA and no demonstrated interest in energy and mineral resources, indicating a low potential for development.

Specific management Rights-of-way will be granted only if there is minimal conflict with identified resource values and impacts could be mitigated. OHV use will be limited to designated roads and trails. The area will be VRM Class II, and plant collecting will require a permit. Road maintenance will be limited to the existing roadway, and shoulder/barrow ditch construction will be limited to that necessary to control runoff, minimize soil erosion, and ensure public safety and serviceability of the road. The ACEC/RNA will be open to locatable and leasable minerals activities and closed to saleable minerals. Surface-disturbance will be deferred while soils are wet, and any future rehabilitation will be with local source native plant species. Livestock use will continue based on existing permit stipulations and approved AMP's. Any proposed changes in grazing, including time and intensity of use, will be evaluated for impacts on the relevant and important values and will be permitted if the values will be maintained or enhanced. Existing livestock use will be adjusted where adverse impacts are identified using a variety of methods, including but not limited to fencing, reduction in livestock numbers, and changes in grazing season. Proposed projects in the area will be evaluated for impacts and permitted where relevant and important values will be maintained or enhanced. Noxious weeds will be aggressively controlled using limited methods, such as backpack hand sprayers, focusing on roads and other disturbed areas in and adjacent to the ACEC/RNA.

be foreclosed or diminished if the river is not protected as part of the NWSR system; other agencies, organizations or publics interested in designation or nondesignation; administrative costs; ability of the agency to manage and/or protect the river area; historic or existing rights. Refer to Table 14 for suitability.

Legal considerations specific to existing designated national wild and scenic rivers: The 1993 Main, West Little, and North Fork Owyhee National Wild and Scenic Rivers Management Plan is currently under litigation regarding grazing management. An Order of Modified Injunction was filed in the District Court of Oregon on April 28, 2000. The order directed that certain fences and water developments (wells, pipelines and troughs) may be constructed by the grazing permittees to facilitate the elimination of grazing at areas of concern identified in the 1993 Main, West Little, and North Fork Owyhee National Wild and Scenic Rivers Management Plan. The District Court of Oregon retains jurisdiction over the case until a court ordered EIS is completed. The new EIS, which will require much data collection to support impact predictions, is projected to be complete in the year 2006. Management of the remainder of the designated Owyhee NWSRs, including grazing management in areas other than the areas of concern listed in the river plan EA, will continue under the direction of the plan of 1993, until amended.

Monitoring: Monitor use and ORVs within designated and administratively suitable rivers to ensure protection and enhancement of ORVs consistent with the NWSRA. Also see Appendix W.

Management actions:

Congressionally Designated Rivers

The basic river management plan goals for the Main, West Little, and North Fork Owyhee NWSRs are to (1) protect and enhance the outstandingly remarkable recreational, scenic, geologic, wildlife, and cultural values of the designated Main Owyhee River; (2) protect and enhance the outstandingly remarkable recreational, scenic, and wildlife values of the designated West Little Owyhee River; (3) protect and enhance the outstandingly remarkable recreational, scenic, and wildlife values of the designated North Fork Owyhee River; (4) ensure protection and enhancement of the values which caused these rivers to be designated without limiting other uses that are consistent with those goals and do not substantially interfere with public use and enjoyment of these values; (5) provide visitor services to enhance the enjoyment of the Owyhee River System while protecting the unique and sensitive resource values of the area; and (6) enhance visitor and land user appreciation of the important resources of these rivers.

Manage the Main, West Little, and North Fork Owyhee NWSRs in accordance with the approved 1993 river management plan, while remaining in compliance with (1) the judge's opinion and order which affects livestock grazing in the plan's areas of concern and (2) resolution of litigation. For the Main Owyhee NWSR, the Deary Pasture area of the Jackies Butte Allotment will be closed to livestock grazing. Livestock trailing will continue where feasible and in compliance with the District Court of Oregon's direction. The acquired properties known as the Birch Creek Historic Ranch will be closed to application for term grazing permits except for temporary grazing authorizations. These will be issued at the discretion of the BLM for management purposes (including, but not limited to, vegetation manipulation or field management), administrative purposes, and interpretive needs. Designated buildings at the Birch Creek Historic Ranch will be available to the public for overnight use and other compatible uses consistent with public safety requirements. Opportunities for

Southeastern Oregon Resource Management Plan

closely supervised concessionaire agreements may be pursued, consistent with protection of ORV's and historic values.

Uses within congressionally designated NWSR's will be restricted or excluded where such uses are determined to degrade ORV's or impair opportunities for enhancement of ORV's.

Administratively Suitable Rivers

Provide interim protection of the ORV's of administratively suitable rivers while awaiting a determination by Congress. Refer to BLM Manual 8351 for NWSR IMP guidelines.

Approximately 42.5 miles of eligible rivers and streams (Map WSR-1) are determined to be administratively suitable for designation by Congress as NWSR's (as depicted in Table 14). This will include three river segments in MRA: Dry Creek (16.8 miles with a tentative wild classification), Owyhee River Below the Dam (13.5 miles with a tentative recreational classification), and North Fork Malheur River (3.6 miles with a tentative wild classification); and Antelope Creek (8.6 miles with a tentative wild classification) in JRA. These river/stream segments and their associated interim corridors of public lands (as noted in Table 14) will be provided interim protection of their ORV's while awaiting a designation determination by Congress. Refer to BLM Manual 8351 for NWSR interim management guidelines. Uses within these administratively suitable rivers will be restricted or excluded where such uses are determined to degrade ORV's.

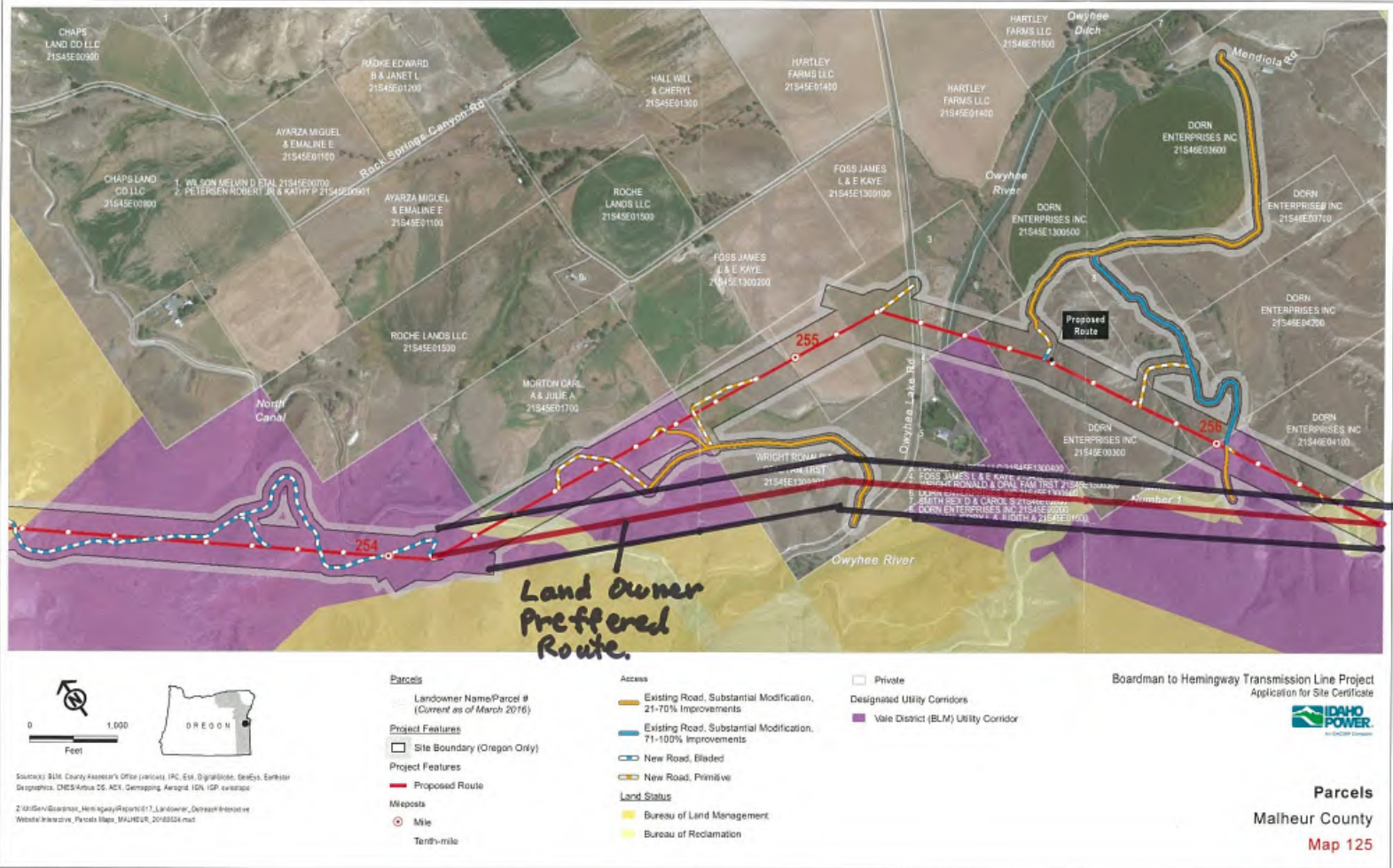
Land Adjacent to Wilderness Study Areas

Objective: BLM-administered land identified in the 1991 Wilderness Study Report, Oregon (WSRO) and determined to have wilderness values will be included in adjacent wilderness study areas (WSA's) and managed under the Interim Management Policy for Land under Wilderness Review (IMPLWR).

Rationale: Under FLPMA, wilderness preservation is part of BLM's multiple-use mandate, and wilderness is recognized as part of the spectrum of resource values considered in the land use planning process. Under the wilderness review program, the existing designated WSA's are managed in accordance with BLM's IMPLWR. The general standard for interim management is that land under wilderness review must be managed so as not to impair suitability for preservation as wilderness. Wilderness characteristics and values, described in section 2(c) of the Wilderness Act of 1964 (Public Law 88-577), must be protected and enhanced in all WSA's. The initial task of identifying areas suitable for wilderness preservation has been completed as mandated in FLPMA section 603, and is documented in OWFEIS and WSRO. In addition, and as identified in the WSRO, there are parcels of public land outside but immediately adjacent to WSA's that have been recommended as suitable for wilderness designation. These areas will be included in the appropriate WSA and managed as WSA's under authority of FLPMA sections 202 and 302. The IMPLWR will apply to these areas while under wilderness consideration by Congress.

Monitoring: Monitoring and surveillance of the parcels of land added to existing WSA's will be done to ensure compliance with IMPLWR.

Management Actions: Certain tracts of land that were identified in the WSRO as non-Federal land identified for possible acquisition (that have since been acquired) or as adjacent Federal land recommended for wilderness will be added to existing WSA's and managed under IMPLWR guidance. This addition will be about 3,280 acres of affected adjacent BLM land and 860 acres of acquired non-Federal land which, combined, affect a total of five WSA's (see Table 15). See Map WSA-1 for the location of existing WSA's in the planning area.



TARDAEWETHER Kellen * ODOE

From: joel baker <joeld.baker@outlook.com>
Sent: Friday, August 16, 2019 3:50 PM
To: B2H DPOComments * ODOE
Subject: Fw: Scan to Email
Attachments: EmailScan_08162019.pdf

August 14, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line.

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C: Property Location and Maps; Exhibit L: Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T: Recreational Facilities; and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times. EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating that undergrounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined that IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refuse to approve the Draft Project Order for the following reasons:

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.
4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44° 48' 48.26"N 117° 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.

5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
 - a. It is a BLM ACEC area managed for public tourism
 - b. It is the single most visited tourist facility in Baker County
 - c. The quality of the facility is outstanding
 - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

The Oregon Trail along the route of the B2H has the most damaging effects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. Once gone, always gone. The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the site certificate for the Boardman to Hemingway Transmission project.

Thank you,



Signature

Printed Name: Joel Baker

Mailing Address: 1815 20th ST
Baker City, OR. 97814

Email: Joeld.Baker@outlook.com

TARDAEWETHER Kellen * ODOE

From: joel baker <joeld.baker@outlook.com>
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From: Joel Baker <Joel.Baker@HALLIBURTON.com>
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Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

Joel Baker

Name: Joel Baker

Address: 1815 20th ST
Baker City, OR. 97814

TARDAEWETHER Kellen * ODOE

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<insert date>

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Via Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the B2H Transmission Project 9/28/2018; DPO 5/23/2019

Dear Chair Beyeler and Members of the Council:

My comment is about the blasting that would likely be required during the construction phase of the B2H line near MP 106—108 of the IPC-preferred Mill Creek route. Although the application does not specify where blasting will occur, *Attachment G-5 Framework Blasting Plan* states: "Blasting may be needed in certain areas with rocky terrain to excavate tower footings, prepare station pads, and to construct access roads."

The relevant standard is the 345-022-0020 Structural Standard:

"(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;"

My impression from reviewing the application is that the applicant has not fully considered the impacts of blasting on the nearby unstable slope in a populated area of La Grande, Oregon. The map on page 169 of *Exhibit H Geological Hazards and Soil Stability*, shows the B2H line at MP 106—108, where it is within about 2500' of a populated "Unconsolidated Sediments" zone (labeled Qf) and then crosses a "Landslide Deposits" zone (labeled Qls) near MP 108.

The application also mentions the slope instability in a small part of this area, on page 112 of *Exhibit H – Attachment H-1 Appendix B Soils Data Tables and Maps*:

"One of the landslides mapped by Schlicker and Deacon (1971), not included in SLIDO, intersects the IPC Proposed Route between towers 106/3 and 106/4. Based on review of topography and aerial photographs, this mapped landslide may impact the proposed work areas around tower 106/4. A field reconnaissance of this area should be performed as part of the geotechnical exploration program."

My concern is more about the construction process than about the integrity of the towers after construction. The application identifies the problem in general but provides no detail about the blasting or about the potential effects on nearby houses in an area that the City of La Grande designates as a "Geologic Hazard Zone." We know that each tower footing will require a hole 30—50' deep, and that the bedrock underneath the line at MP 106—108 will almost certainly require blasting for efficient excavation. The application does not address this concern, and the proposed construction is simply too close to a populated area to mitigate the risk of damage to homes. The application does not comply with the relevant standard.

Sincerely,



<insert your name> Joel Baker
<insert your address> 1815 20th ST
Baker City, OR 97814

TARDAEWETHER Kellen * ODOE

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July 2, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.

Re: Geologic Hazard Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes in an active seismic zone**

My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to the public, both local area residents and travelers on the nearby Interstate 84.

The relevant standard is the 345-022-0020 Structural Standard:

“(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 95/3 and 95/4** is shown and described on the following tables and maps:

Exhibit H – Attachment H-1 Appendix B Soils Data Tables and Maps by Shannon & Wilson, Inc.:
Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. Sheet 3 of 4

Exhibit H – Appendix C: Summary of Proposed Boring Locations:

Map Sheet 36 - Drill site 95/3 and 95/4

Exhibit H – Table C1: Summary of Proposed Borings – Sheet 2 of 8

95/3 – cited for Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 – cited for Angle change along alignment; Road and railroad crossing

Exhibit H - Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5,6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

The relevant standard is the 345-022-0020 Structural Standard:

“(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

The applicant has not fully described the risks of heavy construction in this area. What mitigation methods would be required to place earthquake resistant towers on unstable slopes, in an active seismic zone, if the area suffered an earthquake of the intensity that formed these slopes.

Special Paper 6, included on the DOGAMI website, describes an extensive study done in 1979 by the Geoscience Research Consultants in Moscow, Idaho and State of Oregon Department of Geology and Mineral Industries on the seismic history of the Blue Mountains and the La Grande area. The introduction of this paper is closes as follows: “In summary, consistencies of structural trends, compatibility of the Blue Mountain folding to backslope faulting in the La Grande area and systematic distribution in the orientation of linear trends favor northwesterly compression as the tectonic control in the study area. Furthermore, the general lack of interference, or lateral offset of linears or of any of the intersecting faults, as is discussed in the next sections, **suggest that all of the post-Columbia River Basalt Group structures in the area near La Grande have been created in response to only one major tectonic episode.**”

Further in the same paper “The Graves Creek-Rock Creek-Coyote Creek area has the greatest density of faults within the study area. At least six major and several minor northwest-trending faults of the Rock Creek fault system occur in the area (Plate 1). The Graves creek fault can be traced from the eastern edge of Sec. 7, T35S, R37E to the southern boundary of the Hilgard 7 ½ - minute quadrangle, a distance

of about 6 mi (10 km). The Graves Creek fault probably extends farther southeastward beyond the map area. Offset across this fault is 265 ft (80 m) in Sec. 34, T 35S, R37E.”

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 28) includes the following brief description of the area: The Mt. Emily Section (802) is described as “an 18 mile fault, forming a steep range front from Thimbleberry Mountain to the mouth of the Grande Ronde River Canyon, by Personius, compiled by the U.S. Geological Survey website and assessed in 11/16/2016.”

“The West Grande Ronde Valley fault zone may be active. Subtle topographic features indicate that there may have been earthquakes that broke through the ground surface as recently as the last 10,000 years. Previous studies indicate that the West Grande Ronde Valley fault is capable of generating a magnitude 7 earthquake.” From Summary of the La Grande Quadrangle Geology” also on DOGAMI website.

DOGAMI recommendations for protection of the Portland’s infrastructure HUB in the secondary flood zone of a possible Cascadia Subduction Fault earthquake/tsunami have been largely unimplemented for lack of funding, as is the ShakeAlert system which, unless funded will not be available in Oregon until 2021 at the earliest. ShakeAlert is an early warning system being developed by USGS. Oregon made national news when “Governor Brown signed HB 3309, which amended the previous law to no longer prohibit the construction of building such as hospitals and schools and other emergency-preparedness centers in tsunami inundation zones along the coast. The bill had bipartisan support and bucked standards held for twenty-five years keeping those facilities out of harm’s way should a massive tsunami hit.” Wisely, some cities along the coast continue following original DOGAMI assessments and recommendations concerning new infrastructure built away from the inundation zone. How this will impact funding assistance to move the existing schools, hospitals, city halls and emergency services?

Clearly Oregon legislative priorities have moved away from seismic hazard emergency preparedness, but this potential hazard to the area brings with it considerable risks, despite the proposed construction “mitigation” methods. It is within the EFSC’s judgment to decide against adding an additional hazard to the natural and infrastructure hazards the citizens of this area already live with.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to the heavily traveled I84 transportation/utility corridor, the Hilgard Junction State Recreation Area and the Grande Ronde river. Further study and subsequent intrusive construction will not reduce the risks to the safety of the travelers through this canyon or the residents of the valley nearby. The application does not comply with the relevant standard.

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. “The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule seismic hazard includes ground shaking, ground failure, landslide, liquefaction, triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction.

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to Hilgard State Recreational Area, and the I84 transportation/utility corridor.

Additional letter of credit dedicated solely for financial restitution necessary to restore potential damage caused by any of the above in an amount sufficient to restore the surrounding environment and infrastructure, both publicly and privately owned.

Thank you for your consideration,

Sincerely, *Joel Baker*

Name: *Joel Baker*

Address: *1815 20th ST
Baker City, OR. 97814*

References

Barrash, Warren, John G Bond, John D. Kauffman, and Ramesh Venkatakrishnan, 1980, Geology of the La Grande Area, Oregon: Oregon Department of Geology and Mineral Industries Special Paper 6.

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Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 *SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2*; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy, Energy Facility Siting Council, OAR Amend: 345-022-0020; *Structural Standard* EFSC 2-2017 Chap. 345, Division 22; General Standards for Siting Facilities. Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018, Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Loew, Tracy, *Salem Statesman Journal* ; June 24, 2019 *Oregon Legislature Repeals Tsunami Zone Building Law.*

TARDAEWETHER Kellen * ODOE

From: joel baker <joeld.baker@outlook.com>
Sent: Friday, August 16, 2019 3:54 PM
To: B2H DPOComments * ODOE
Subject: Fw: Scan to Email
Attachments: EmailScan_08162019.pdf

This e-mail, including any attached files, may contain confidential and privileged information for the sole use of the intended recipient. Any review, use, distribution, or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive information for the intended recipient), please contact the sender by reply e-mail and delete all copies of this message.

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

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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.

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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.

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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:

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Therefore, the Council should DENY the application for site certificate.


Signature


Printed Name

Mailing Address: 1815 20th ST
Baker City, OR 97814

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August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
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Therefore, the Council should DENY the application for site certificate.


Signature


Printed Name

Mailing Address: 1815 20th ST
Baker City, OR 97814

ESTERSON Sarah * ODOE

From: Tork Ballard <tballard@centurylink.net>
Sent: Thursday, August 22, 2019 12:48 PM
To: B2H DPOComments * ODOE
Subject: Aug 21 2019.docx b2h comment.docx
Attachments: Aug 21 2019.docx b2h comment.docx



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Aug 21 2019

Energy Facilities Siting Council

Subject: Idaho Power application for a Site Certificate for the Boardman to Hemingway Transmission Project.

We oppose this project. Our families have inhabited this beautiful part of the state for over a century and some have ties to the native inhabitants. The sight and thought of this eyesore is so unacceptable to us. The over all negative impact is hard to address, with that said we will voice our concerns and also need to mention, we have attended more then one meeting and find every argument against the B2H line to be very valid.

Need. Idaho Power has failed to show a pressing need for these lines, in fact research shows the demand has been steady for over 20yrs. Innovation and conservation are effective when utilized. Across the country from 2010 to the present, residential sales have declined by 3%, on average, using 7% less electricity. Population has increased but the drop in average demand has decreased even faster. The increase in population has been matched step-for step by renewables and by more efficient use of energy. Idaho Power hasn't included all existing transmission capacity they already have to the Northwest energy market creating the illusion a shortage exists for transmission lines.

Security. These lines are vulnerable to sabotage. Research and real life experience argue strongly for tuning away from ever larger grid components and towards the emerging modular grid. The failure of one large transmission line can cascade across and entire region with cities and rural areas blacked out and vulnerable.

Cultural/historical...Idaho Power and their consultants have not acknowledged trail crossings show on submitted maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's put into documents some trail protections. This has been consistent from the BLM process to current day. Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources.

We have voiced some but not all concerns, but know the council is hearing from many besides us. Knowing all concerns have been presented, now it's the councils obligation to make a just decision and Deny the Site Certificate.

D.M. and Wanda Ballard

18850 W. Campbell Loop—Baker City, Oregon 97814

TARDAEWETHER Kellen * ODOE

From: Andy Baltensperger <abaltens@alaska.edu>
Sent: Friday, July 26, 2019 2:58 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Energy Facilities Siting Council letter.docx

Please find attached, my comments for the Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project.

Thank you,
Andy Baltensperger

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Via email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

I am writing in opposition to the application for a site certificate for the B2H transmission project. I am a landscape ecologist and new resident to La Grande, OR and I am specifically concerned that this proposed project does not adequately address impacts to the local viewshed. I bought my house specifically for its view of the Blue Mountains to the west. This view currently does not include a set of grotesque, metal towers over the hill and I would like it to remain this way.

The Draft Proposed Order fails to support Applicant's assertion that the Oregon Trail Interpretive Center, a protected area, will not suffer significant negative visual impacts from this project as delineated in OAR 345-022-0080. Visual Impacts, (Exhibit R p. 79) The development will create an energy corridor directly in front of the Interpretive Center, opening up the area to construction of future transmission lines and utility lines which could be developed without consideration of damages to this site. The effects of placing this line as close as 105 feet to the Interpretive Center is significant. Is a set of giant powerlines really what we want new visitors of La Grande to be welcomed by? The structures proposed will present a wider profile than standard structures and will be significantly taller than existing transmission lines in the viewshed. The applicant has exaggerated the cost of placing the line underground, failed to provide documentation to support its claims and proposed no meaningful mitigation. An independent study of costs to bury transmission lines in geographically similar areas is necessary to meet the standard of preponderance of evidence.

I am also concerned about impacts to the historic Oregon Trail corridor, which extends to the northwest from the Interpretive Center and crosses the proposed powerline route just above La Grande. The application does not adequately address potential impacts to this historic trail and to any adjacent archaeological resources. I would encourage further study of these impacts but I am unclear how an infrastructure project of this magnitude could avoid adversely affecting historical landmarks and local viewsheds. None of these impacts are in the interest of the La Grande or its residents. Please deny this site certificate!

Thank you for your consideration,

Andy Baltensperger
1707 Cedar St.
La Grande, OR 97850

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AUG 22 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, Oregon 97301

email: B2H.DPOComments@Oregon.gov

The introduction of the Boardman to Hemingway Transmission line creates an unacceptable increased risk of catastrophic fire. Of the six counties in Oregon which the transmission line would cross, five of them are rated as having a high risk of wildfire.

Idaho Power has indicated that they do not plan to provide their own fire protection, but plan instead to rely upon local fire fighting resources to deal with fires caused by the transmission line. They have rejected the suggestion from Baker County that they develop a specialized fire fighting resource to fight wild fires in the unpopulated areas the transmission line would cross and provide them with the specialized equipment that local fire departments in the area are lacking. They also have not responded to comments from Union County Fire Departments indicating a need for them to provide specialized equipment to address wildfires.

The issue is further problematic due to the fact that at least in Union County, the developer has stated their intent to rely upon local firefighting resources. In Union County there are only four fire departments that are not Rural Fire Protection Districts, RFPD's. These RFPD's are trained to fight structural fires, not wildfires. Further, the definition of a RFPD limits them to "providing structural fire protection to its constituents." Idaho Power must establish their own methods of fighting wildfires along the transmission line. They cannot rely upon the local resources identified to address structural fires to provide protection from wildland fires. *BAR 345-022-0110*

P. Barreto
(Patrice Barreto)
60214 Morgan Lake Rd.
La Grande, OR 97850
541-786-4388

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

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Therefore, the Council should DENY the application for site certificate.



Signature

Caroline Barnes

Printed Name

Mailing Address:

63101 Buchanan Lane
La Grande OR 97850

RECEIVED
DEPT. OF ENERGY
Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

As a Professional Civil Engineer and Construction specialist,
I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within 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.

RECEIVED

AUG 29 2019

DEPARTMENT OF ENERGY

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,



Name: *Caroline Barnes*

Address: *63101 Buchanan Lane
La Grande OR 97850*

July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Sitting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

A Professional Civil Engineer, resident of La Grande,
I am an ~~Eastern Oregonian~~ and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes**
345-022-0020

(c) ...*The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states *“The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.”* Idaho Power Corporation admits in ASC page B-12 that *“The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges.” IPCs stated original intention to the EFSC was the following: “Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,



Signature

Caroline Barnes

Printed Name:

Mailing Address:

63101 Buchanan Lane
La Grande OR 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

As a Professional Civil Engineer with nearly 30 years of practice in OR, WA & AK,

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

simply The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, ~~basically~~ by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,



Name: *Carolai Barnes*

Address: *63101 Buchanan Lane*
La Grande, OR. 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant" (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38).
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, "Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary, 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,



Signature

Printed Name: *Caroline Barnes*

Mailing Address: *63101 Buchanan Lane
La Grande OR 97850*

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council: *I am very concerned about the following findings in the Idaho Power application:*
Page 62 (T-57) ASC refers to "extensive work in the siting study of the Morgan Lake Alternative," ~~and~~ *and it was extensive because it is entirely inaccurate: appears to be inaccurate due to several findings such as:*

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, which is developed with primitive campsites and fishing docks. *However,*

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300' of Morgan Lake; it covers 27 acres.

* Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. In their application, Idaho Power conveniently omits any references to Twin Lake.

Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it's difficult to believe "extensive work on this siting study" ever occurred.

The applicant also used aerial photography to identify and avoid, where practical, irrigation pivots, houses, barns, private runways, other structures (e.g., wind turbines), and land use features. The corridors were adjusted using topographic maps to avoid or minimize distance across very steep slopes and other physical features less desirable for transmission line construction and operation. The corridors were again checked against the constraint and opportunity geographic information system (GIS) database to avoid, where possible, exclusion areas and areas of high permitting difficulty such as potential Oregon Department of Wildlife (ODFW) Category 1 habitats. The applicant then grouped the alternative corridors into 14 regions and evaluated on the basis of permitting difficulty, construction difficulty and mitigation costs. Using the constraint database, which incorporated the eight siting factors, the applicant reviewed the alternatives to determine the most reasonable corridor within each region. (DPO p. 11)

It is distressing to think that this is only one of many errors in Idaho Power's ASC. If the IPC surveying ^{and} engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it's disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety -

*incomplete and erroneous
representative*

If this ~~shoddy~~ effort is ~~typical~~ of IPC's ~~careful~~ attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake route rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by ~~the~~ individuals whose remote properties and summer cabins would have been impact by the line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the routes proposed for the B2H. The haste of this effort is evident in the abundant errors of omission and misinformation typical of the B2H ASCand DPO which will be addressed in a separate comment.



Signature

Name: *Caroline Barnes*

Address: *63101 Buchanan Lane
La Grande OR 97850*

August 12, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous times in **Exhibit S** and the **Historic Properties Management Plan and Programmatic Agreement**. OCTA does NOT believe that Exhibit S Historic Properties Management Plan is complete in 7.2.3 Field Crew, and offers this additional condition.

ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such as geology, engineering or history. It will not be necessary to have attended a field school. This individual will be recommended by the National OCTA President and agreed to by the Field Director.

The field surveys, even with SHPO and NPS data, have missed and/or mislabeled some sections of the emigrant trail. OCTA wants the public to know where the Trails are and I do too! OCTA over the years has marked the trail location with wooden signs, small triangles attached to trees, and more recently, carbonite posts and steel rails. Most private property owners are proud of the trail on their property, and after obtaining permission allow the public to walk and hike on the trail.

* Idaho Power and their consultants have not acknowledged trail crossings shown on submitted Maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's, put into documents some trail protections. This has been consistent from the BLM process to current day.

Considering the points above, Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources. **EFSC Must Deny the Site Certificate!**



Signature

Printed name: *Caroline Barnes*

Mailing address: *63101 Buchanan Lane
La Grande OR 97850*

Email address:

phone number: (optional)

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

* A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,



Signature

Printed Name: *Caroline Barnes*
Mailing Address: *63101 Buchanan Lane
La Grande OR 97450*



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) ROGER BARNES

Mailing Address (mandatory) PO Box 1224
LA GRANDE OR 97850

Phone Number (optional) (541) 786-1773 Email Address (optional) _____

Today's Date: 6/20/19

Do you wish to make oral public testimony at this Hearing: Yes X No _____

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) LOIS BARRY

Mailing Address (mandatory) P.O. Box 566
LAGRANDE, OR 97850

Phone Number (optional) () _____ Email Address (optional) loisbarry31@gmail.com

Today's Date: 6/20/19

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Page 46	<p>1 fire start, possible limited visibility preventing early 2 detection, possible spotting from a remote ignition, and 3 other variables bringing wildfire to the transmission 4 line route to suppress the incident in time to stop 5 encroachment into the city limits and to save structures 6 in the Wildland-Urban Interfaces that are also in 7 proximity to the transmission line route? 8 These factors must be taken into account 9 before approval and construction of the Boardman to 10 Hemingway system. 11 In Oregon on June 14 -- 12 HEARING OFFICER WEBSTER: Mr. Rosenbaum, we 13 are out of time. 14 MR. MICHAEL ROSENBAUM: I have got another 15 minute. Okay? 16 HEARING OFFICER WEBSTER: Okay. 17 MR. MICHAEL ROSENBAUM: In Oregon, on June 14, 18 2019, according to "The Statesman Journal," Pacific 19 Power, with approximately 600,000 end-user customers, 20 proposed to shut down electricity during extreme weather 21 events, which will help limit the effects of the grid on 22 wildfire. It is likely that other Oregon power 23 companies with local end users will follow suit, in my 24 estimation. 25 In California, PG&E has recently cut power in</p>	Page 48	<p>1 of wildfire intrusion and exposure. It would put values 2 at risk with a failed line on the ground or involvement 3 of transmission lines and support structures in a 4 wildfire. Values such as firefighting personnel and 5 equipment, homes, structures, including medical 6 facilities, businesses, infrastructure, private 7 timberlands and pasture. 8 If the system is not a causative factor in a 9 wildfire start, it could be a contributing factor in the 10 rapid acceleration of unchecked wildfire spread. 11 Should you approve this transmission line 12 route through the Blue Mountains, and specifically in 13 proximity to La Grande, you are quite literally playing 14 with fire. 15 HEARING OFFICER WEBSTER: Thank you. 16 After we hear from Ms. Barry, we will hear 17 from John Anderson. 18 MS. LOIS BARRY: I'm Lois Barry, L-o-i-s, 19 B-a-r-r-y. I live at 60688 Morgan Lake Road in 20 La Grande, which appropriately enough is the 150 acres 21 that burned in a 1973 forest fire that Mike Rosenbaum 22 just referred to. That is the fire that endangered the 23 entire town of La Grande and especially the hospital. 24 At the moment, the current proposed Mill Creek 25 route of the B2H would put three towers right across the</p>
Page 47	<p>1 extreme weather conditions in several northern 2 California counties, including Butte County where 3 Paradise is located. 4 Note that the Soda fire in 2015 in southwest 5 Idaho and Oregon was not caused by a failure in Idaho 6 Power's system, but did require the company to replace 7 2.5 miles of transmission line. I ask: What is the 8 guarantee to the people of La Grande, Oregon, that Idaho 9 Power, with no local end-user customers, will shut power 10 generation in the event of red flag warnings locally for 11 extreme conditions, including low RHs of single digits 12 to the low 20 percents, lightning activity levels of 4 13 and higher, extended high temperatures, severe 14 thunderstorms with attendant high outflow winds? 15 I haven't gone into the issue of the changing 16 climate of the Blue Mountains and also the frequent 17 changes in weather patterns from year to year during 18 fire season. The estimate in the Blue Mountains is the 19 temperatures could increase 4 1/2 to 6 1/2 degrees over 20 the next 30 years. 21 In conclusion, I propose that the Boardman to 22 Hemingway transmission line, with the suggested routes 23 in close proximity to the City of La Grande and 24 structures in the Wildland-Urban Interface, would 25 contribute to the vulnerability and the high probability</p>	Page 49	<p>1 middle of that 150 acres of 40-foot high pine trees that 2 have regrown in the last 50 years. That was an aside. 3 Now, I have two statements. I realize that 4 the mission of the EFSC committee is to choose a route 5 for the B2H and not to decide if it's a good project. 6 Even so, you should know that the B2H project has a 7 basic flaw. It was discussed as early as 2006, and 8 those plans have not changed in 13 years: It is no 9 longer needed. And if it were needed, the BLM 10 environmentally-preferred route should be the route of 11 choice. If you approve the site application for the B2H 12 now, whatever route is chosen, will become the site of a 13 \$1.2 billion stranded asset. 14 My second point. I'm a retired professor. I 15 taught research writing and critical thinking for 16 25 years. And I have carefully read several relevant 17 sections of Idaho Power's application. It's a 18 substandard piece of work. It's replete with obvious 19 inaccuracies and unsupported conclusions. 20 And here is a clear example of a factual 21 inaccuracy: Page 62 refers to, quote, "extensive work 22 in the siting study of the Morgan Lake Alternative," 23 unquote. I doubt it was extensive because it's 24 completely inaccurate. Morgan Lake Park is described as 25 204 acres, containing one lake, which is developed with</p>

Page 50

1 primitive campsites and a fishing dock. Morgan Lake
2 Park actually contains two lakes. Morgan Lake covers
3 70 acres.
4 The other, Twin Lake, is in plain site within
5 300 feet of Morgan Lake, it covers 27 acres. Twin Lake
6 is undeveloped, a wildlife and bird sanctuary, home to
7 nesting bald eagles. It is designated as protected
8 wetlands. In their application Idaho Power conveniently
9 omits any references to Twin Lake.
10 Page 156 purports to be a map of Morgan Lake
11 Park. According to the map legend the purple crosshatch
12 amoeba-shaped area is Morgan Lake Park. That is wrong.
13 The purple crosshatch is Morgan Lake. The actual
14 boundaries of the 204-acre park are not indicated. And
15 obviously it's difficult to believe "extensive work on
16 this siting study" ever occurred.
17 A specific example of unsupported conclusions:
18 Page 145, Baseline condition, quote: "A goal of minimal
19 development of Morgan Lake Park should be maintained to
20 preserve the maximum natural setting and to encourage
21 solitude, isolation, and limited visibility of users..."
22 Page 146, quote: "The landscape character is
23 natural appearing. Scenic integrity is high as the
24 human developments are harmonious with the landscape."
25 Page 149: "Vegetation will block views of the

Page 51

1 towers from most locations in the park," unquote.
2 In reality, one tower would dominate the
3 entrance to the park, all 130 feet of it in plain view.
4 Within the park, trees bordering the lake are no more
5 than 80 feet high. 130-foot transmission towers will
6 rise more than 50 feet above those trees, dominating the
7 current landscape.
8 Idaho Power simply concludes that the
9 inescapable sight of 500-kV transmission lines and
10 towers around a natural lake setting will have, quote,
11 "no significant impact," on Morgan Lake Park. In
12 research writing this qualifies as wishful thinking.
13 This is the park whose baseline, quote,
14 "should be maintained to preserve the maximum natural
15 setting and to encourage solitude, isolation, and
16 limited visibility of users," unquote, because 50 years
17 ago, no one ever imagined anything larger than a human
18 being might ever intrude.
19 If this application were an airplane, it would
20 have crashed long ago. I urge the Commission to deny
21 this application for a site certificate until each
22 comment submitted at these public meetings and sent to
23 the Commission by July 23rd has been thoroughly analyzed
24 and Idaho Power has provided credible evidence to
25 support each of its conclusions of, quote, "no

Page 52

1 significant impact."
2 Thank you.
3 HEARING OFFICER WEBSTER: Following
4 Mr. Anderson, we will hear from Jonathan White.
5 MR. JOHN ANDERSON: Thank you. Many of the
6 things I have to say have already been covered.
7 HEARING OFFICER WEBSTER: If you could give
8 your name and your address.
9 MR. JOHN ANDERSON: I'm sorry. John C.
10 Anderson, 409 Sunset Drive, La Grande.
11 Many of the things that I have to say have
12 already been covered quite eloquently, but being short,
13 I will say them anyway.
14 There are many good reasons to abandon Idaho
15 Power's planned B2H power line. Today you may hear
16 testimony regarding economics, geology, eminent domain,
17 view scapes, and many others.
18 I would like to talk about the danger of fire.
19 We know about the Camp Fire and the tragic consequences
20 for Paradise, California. This and other major fires
21 were caused by power lines owned by PG&E.
22 B2H will cross the Blue Mountains west of
23 La Grande through areas of extreme risk of wildfire.
24 This is reckless behavior.
25 In 1973, the Rooster Peak Fire started 6 miles

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1 west of La Grande. When it was discovered it was
2 limited to 1 acre. Days later it had consumed 6,000
3 acres and had burned right up to the hospital's grounds.
4 It could happen again.
5 PG&E and other utilities are shutting down
6 some of their lines during times of high risk. If Idaho
7 Power wisely followed their lead, they would lose the
8 power they say they need during a time of peak demand.
9 Siting a high-voltage line through fire-prone
10 areas is an unacceptable risk to take when this line is
11 not needed. I don't think that Idaho Power has
12 presented plans to mitigate this dangerous situation nor
13 the unforeseen consequences of construction during peak
14 fire season.
15 Please consider the safety of La Grande and
16 its surroundings before you make any decisions.
17 Thank you. My written remarks will follow at
18 a later time.
19 HEARING OFFICER WEBSTER: Thank you.
20 Following Mr. White, we will hear from Susan
21 Badger.
22 MR. JONATHAN WHITE: Jon White, 485 Modelaire
23 Drive, La Grande.
24 My comment is about the blasting that would
25 likely be required during the construction phase of the

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1 Idaho Power, same address. So hopefully together we can
2 help answer your questions.
3 MR. MARK STOKES: After listening to all of
4 the comments tonight, we thought there were just a
5 couple of things that we wanted to get corrected on the
6 record.
7 First off, some previous testimony that was
8 presented tonight a statement was made that BPA is not a
9 partner in the project any longer. That is not true.
10 They are still a fully committed partner. In fact, I
11 was in communication with my counterparts at BPA earlier
12 this week before I left town. So I just want to get
13 that on the record.
14 One other item here, a few speakers ago made
15 the statement that Idaho Power does not have any
16 customers in Oregon. And that is not true as well. We
17 serve approximately 15 percent of our total system load
18 is for Oregon customers that are located in Malheur and
19 Baker Counties. So we do have a fairly substantial
20 number of customers in Oregon.
21 So with that, as we have done previous nights,
22 David and I would like to make ourselves available to
23 try and field any questions that Council members may
24 have.
25 VICE CHAIRMAN JENKINS: So Mark and David, I'm

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1 going to ask a really hard question tonight: Why wasn't
2 the BLM route proposed as a part of your application to
3 EFSC?
4 MR. MARK STOKES: Back when BLM was working on
5 getting their ROD issue, the delays in their process
6 happened, occurred. We had to move ahead with the state
7 process late in the application. And by the time BLM
8 came out with their ROD, their record of decision, it
9 was too late for us to really go back at that point.
10 Now, when I had conversations with BLM's
11 program manager about this and whether that created any
12 issues for BLM, they recognized that the Glass Hill
13 route that you're talking about and the Morgan Lake
14 route were identical on parcels that were under control
15 of BLM, federal government.
16 So the fact that in our state application we
17 had the Morgan Lake route did not influence or impact
18 BLM's record of decision in their process.
19 VICE CHAIRMAN JENKINS: Thank you.
20 HEARING OFFICER WEBSTER: Any further
21 questions?
22 CHAIRMAN BEYELER: Not from me tonight.
23 HEARING OFFICER WEBSTER: Thank you,
24 gentlemen.
25 MR. MARK STOKES: Thank you very much.

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1 HEARING OFFICER WEBSTER: Last call for
2 anybody to give any statements?
3 MR. RANDY SILTANEN: Thank you for letting me
4 speak. My name is Randy Siltanen. My address is 1901
5 Foley Street.
6 So I guess my major question to Idaho Power
7 is: For what just cause? So why are we doing this? If
8 there were no other options it would be understandable,
9 but there are plenty of other options. And we have
10 heard tonight dozens of reasons why this is a bad idea,
11 and we haven't heard any reason why this is a good idea.
12 And what it comes down to, to me, I think, is
13 money. And they think that it will be cheaper in the
14 long run to do this rather than use other new
15 technologies.
16 And Mr. Cimon spoke very eloquently about
17 this, that it's yesterday's news. We have got new
18 options. We have solar and we have wind. And there is
19 a very smart engineer by the name of Mark Jacobson at
20 Stanford who has outlined a really good road map for
21 renewable energy by the year 2030. And it doesn't
22 really make any sense to do this if money is the only
23 reason.
24 I think that's what it is, and I think they
25 are wrong on that. At this point they think it's

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1 cheaper, but as Mr. Cimon outlined, it's not. In the
2 long run, it's not cheaper. And there is no just cause
3 to do this. It's not like there is -- it's not like we
4 are trying to provide water to an impoverished area.
5 It's not like bringing electricity to a third-world
6 country who needs it to run their hospital.
7 There is plenty of electricity, there is
8 plenty of ways to get it, and it's not absolutely
9 essential that it goes that way. And yet you are asking
10 people to give up their viewshed. You are putting
11 people's lives at risk for something that is not
12 necessary, other than that it's cheaper, and it seems
13 cheaper, and in the long run it's not cheaper. And that
14 is all I have to say.
15 Thank you.
16 HEARING OFFICER WEBSTER: Thank you.
17 We have run an hour past our allotted time.
18 So anybody -- do you want 2 more minutes, Ms. Barry?
19 MS. LOIS BARRY: This will be very short. But
20 since you have all been so patient and listened for so
21 long and you have heard a lot of important information,
22 one is, from my research, that every single planned
23 transmission line that has been canceled was considered
24 essential until the day it was canceled.
25 But now I think you deserve a laugh. I want

Input on Draft Proposed Order for the Boardman to
Hemingway Transmission Line

Hearing
June 20, 2019

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1 to tell you about a B2H presentation about a year ago.
2 They brought several graphic presentations. Someone
3 said they wished Idaho Power would provide a
4 presentation of what the towers would like look around
5 the valley.

6 Well, this was a presentation of what the
7 towers would look like at Morgan Lake. And so there was
8 the blue sky and the green trees and the blue lake,
9 which in their application they describe as level, calm,
10 and reflective, unlike every other lake in America. But
11 rising out of the blue lake was a large transmission
12 tower painted red. And I said, What is that? What is
13 that about? And he said, Well, look at the caption. It
14 says, "Red is invisible."

15 And that was their graphic presentation of how
16 the towers would look at Morgan Lake. Envision this:
17 Red towers are invisible. Okay, gang, that's what you
18 get.

19 Thank you.

20 HEARING OFFICER WEBSTER: It's now 9:01 and we
21 are going to close this hearing. And the next one will
22 be next Wednesday night in Pendleton.

23 (Hearing concluded at 9:02 p.m.)

24

25

1 **REPORTER'S CERTIFICATE**

2 I, BEVERLY A. BENJAMIN, CSR No. 710, Certified
3 Shorthand Reporter, certify:

4 That the foregoing proceedings were taken before
5 me at the time and place therein set forth;

6 That the testimony and all objections made were
7 recorded stenographically by me and transcribed by me or
8 under my direction;

9 That the foregoing is a true and correct record
10 of all testimony given, to the best of my ability;

11 I further certify that I am not a relative or
12 employee of any attorney or party, nor am I financially
13 interested in the action.

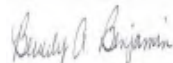
14 IN WITNESS WHEREOF, I set my hand and seal this
15 3rd day of July 2019.

16

17

18

19



20

BEVERLY A. BENJAMIN, CSR 710

21

Notary Public

22

P.O. Box 2636

23

Boise, Idaho 83701-2636

24

25

Lois

EFSC Comments on Amended Preliminary Application for B2H
Lois Barry, 60688 Morgan Lake Road, La Grande, Oregon 97850

Two statements:

1) I realize that your mission is to choose a route for the B2H, not to decide if it's a good project. Even so, you should know that the **B2H has a basic flaw**. It was discussed as early as 2006, and those plans have not changed in 13 years. **It is no longer needed. If it were needed, the BLM Environmentally Preferred Route should be the route of choice. If you approve a site application for the B2H now, whatever route is chosen will become the site of a \$1.2 billion stranded asset.**

2) I'm a retired professor. I taught research writing and critical thinking for 25 years. I have carefully read the relevant sections of **Idaho Power's Application**. It's a substandard piece of work. As a responsible piece of corporate writing, I would give it a D, because **it is replete with obvious inaccuracies and unsupported conclusions.**

2) a. A clear **example of factual inaccuracy:**

Page 62 (T-57) refers to "extensive work in the siting study of the Morgan Lake Alternative." I doubt it was extensive because **it is completely inaccurate:**

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, **containing one lake**, which is developed with primitive campsites and fishing docks.

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300' of Morgan Lake; it covers 27 acres.

Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. **In their application, Idaho Power conveniently omits any references to Twin Lake.**

Page 156, (T-4-6) purports to be a map of Morgan Lake Park. According to the map legend, **the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong.** The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. **Obviously, it's difficult to believe "extensive work on this siting study" ever occurred.**

2) b. A specific example of unsupported conclusion:

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..."

Page 146 (T-4-47) "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape."

Page 49 (T-44) "Vegetation will block views of the towers from most locations in the park."

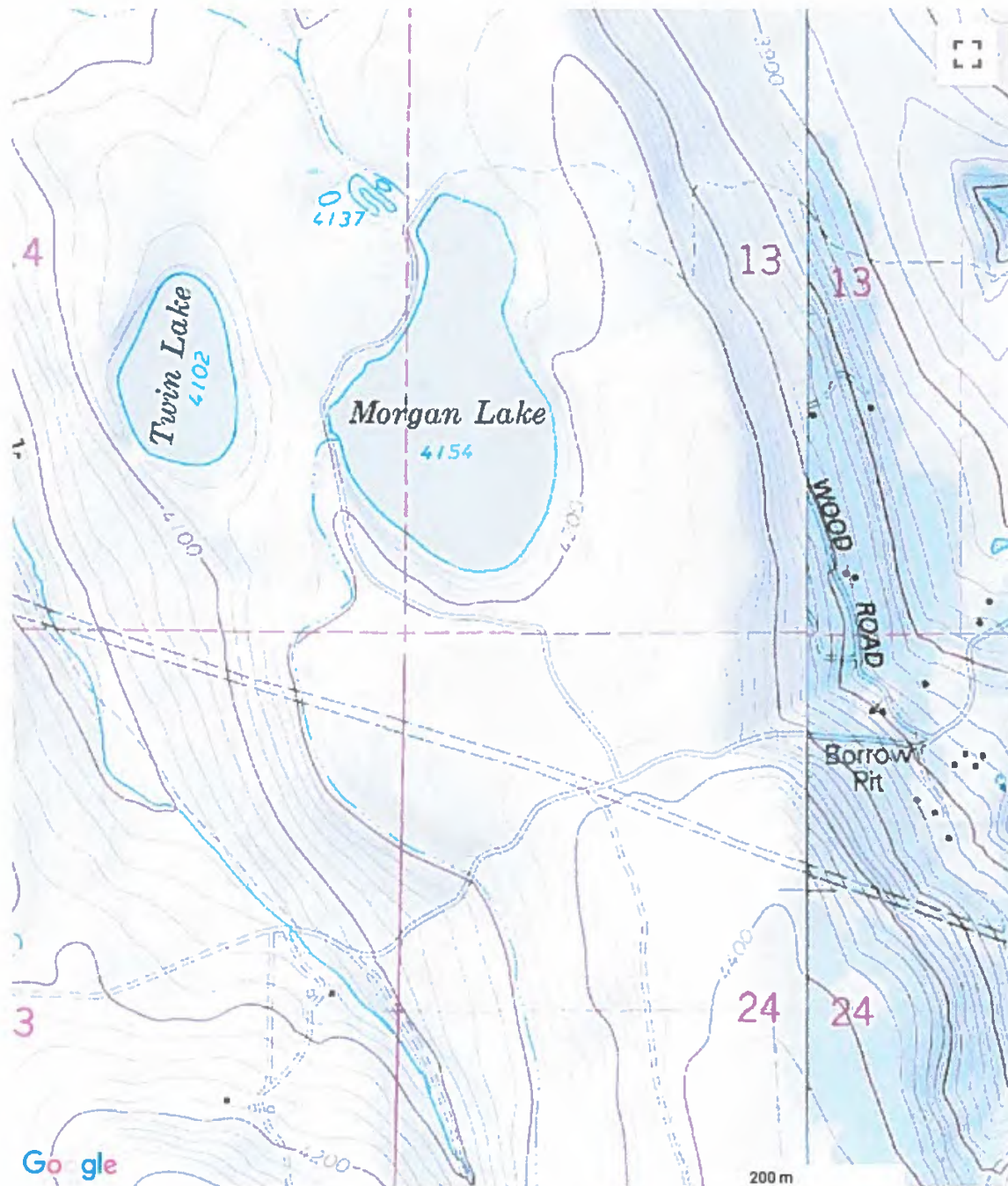
In reality, one tower would dominate the entrance to the park, all 130' in plain view. Within the Park, the trees bordering the lake are no more than 80' high. 130' transmission towers will rise more than 50' above those trees, dominating the current landscape.

Idaho Power does not provide a graphic representation of Morgan Lake Park, with the accurate height of existing trees, and elevation of towers above the trees. **It simply concludes that the inescapable sight of 500 kV transmission lines and towers around a natural lake setting will have "no significant impact" on Morgan Lake Park. In research writing, this qualifies as "wishful thinking."**

This is the park whose baseline "should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users" [because 50 years ago, no one ever imagined anything larger than a human being, a "user," might ever intrude]..."

If this Application were an airplane, it would have crashed long ago. I urge the Commission to deny this application for a site certificate until each comment submitted at these public meetings and sent to the Commission by July 23 has been thoroughly analyzed and Idaho Power has provided credible evidence to support each of its conclusions of "no significant impact."

Morgan Lake Park Topo Map in Union County Oregon



[Print this map](#)

Map provided by TopoZone.com

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

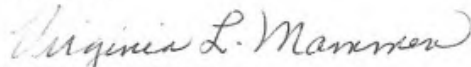
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

Exhibit 1

City of La Grande Ordinance Number 3242,
 Series 2018
 Page 236 of 312

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

²The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³These right-of-way width ranges are for new streets.

⁴Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

Exhibit 2

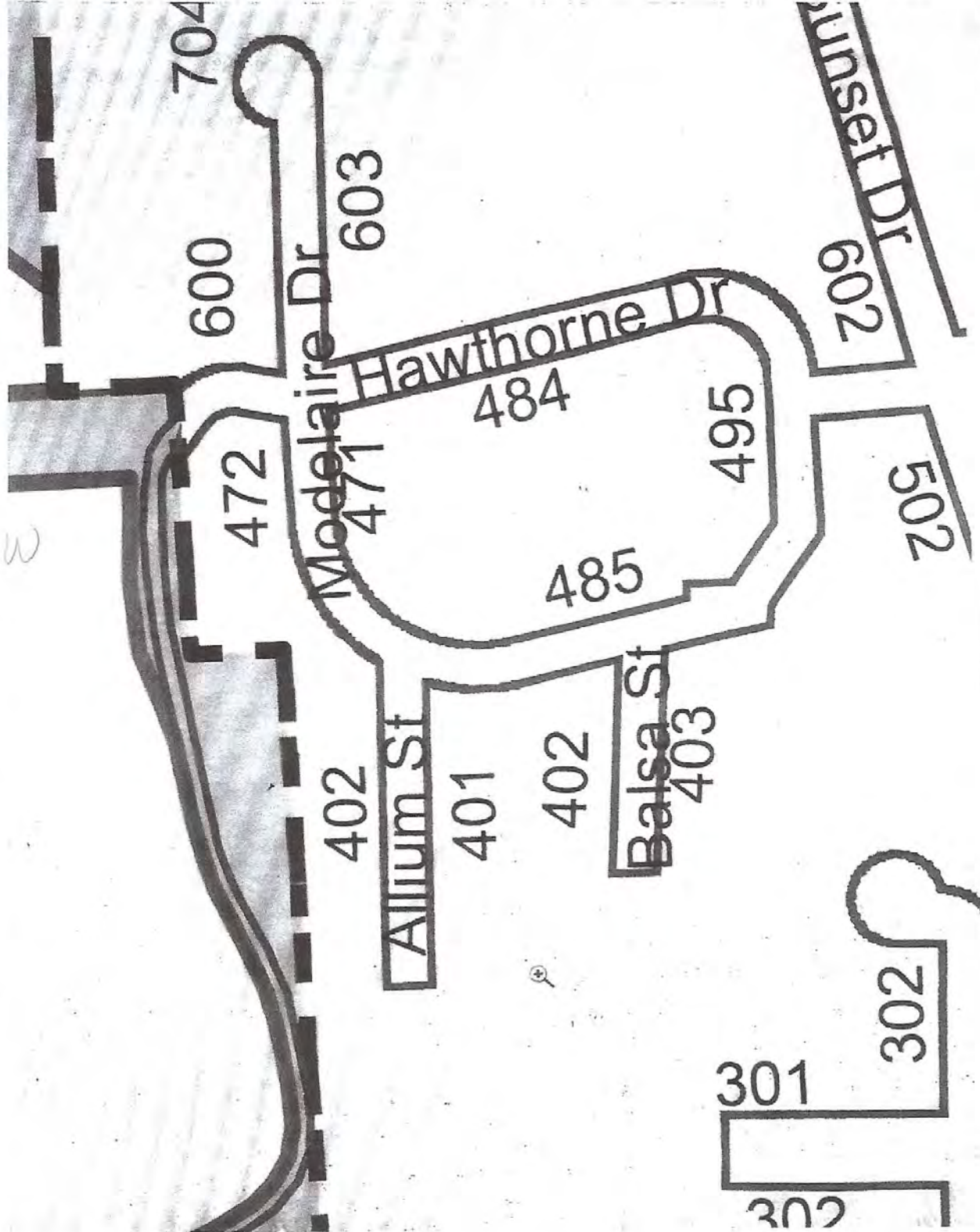


Exhibit 3

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

Exhibit 6

7/25/2019

Gmail - Modelaire Roadway Specifications



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



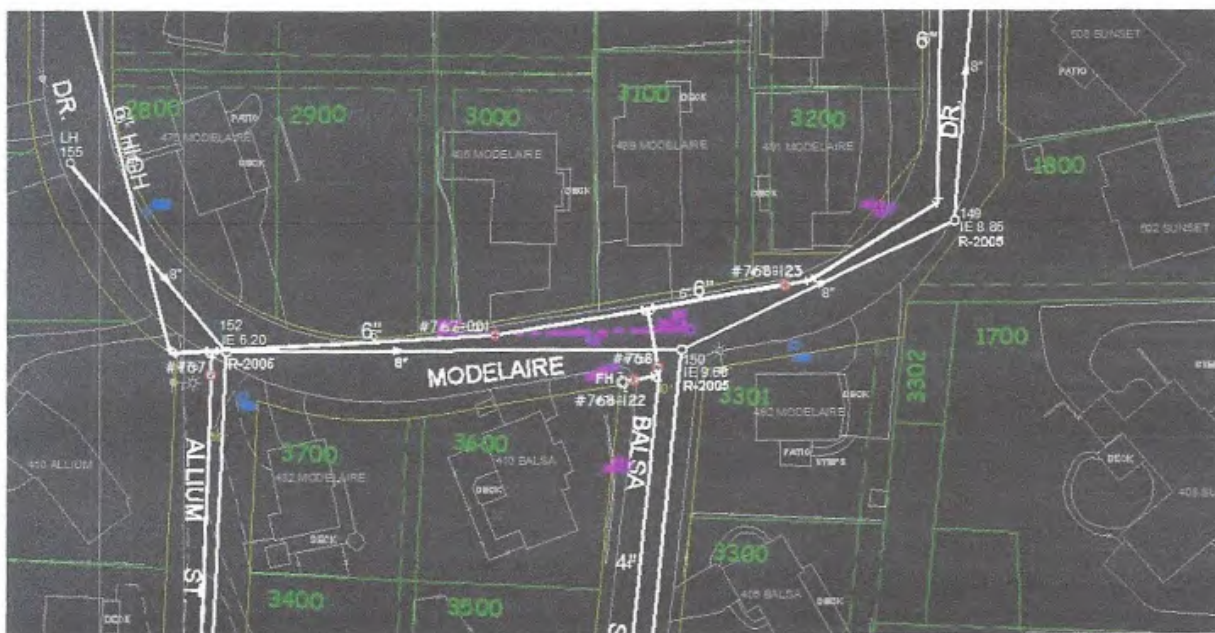
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

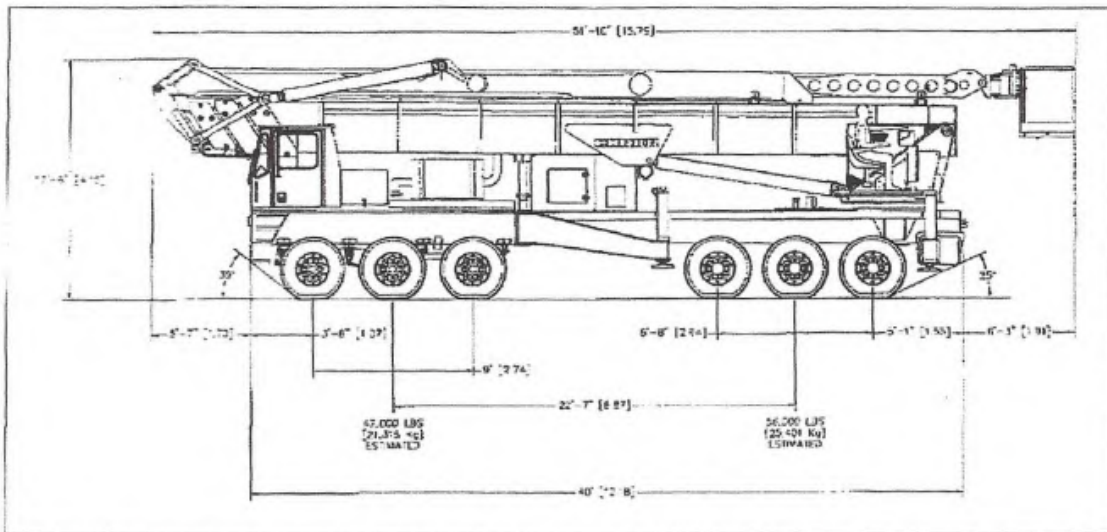


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

City of La Grande Ordinance Number 3242,
Series 2018
Page 252 of 312

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Exhibit 12

Transportation and Traffic Plan

Boardman to Hemingway Transmission Line Project

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

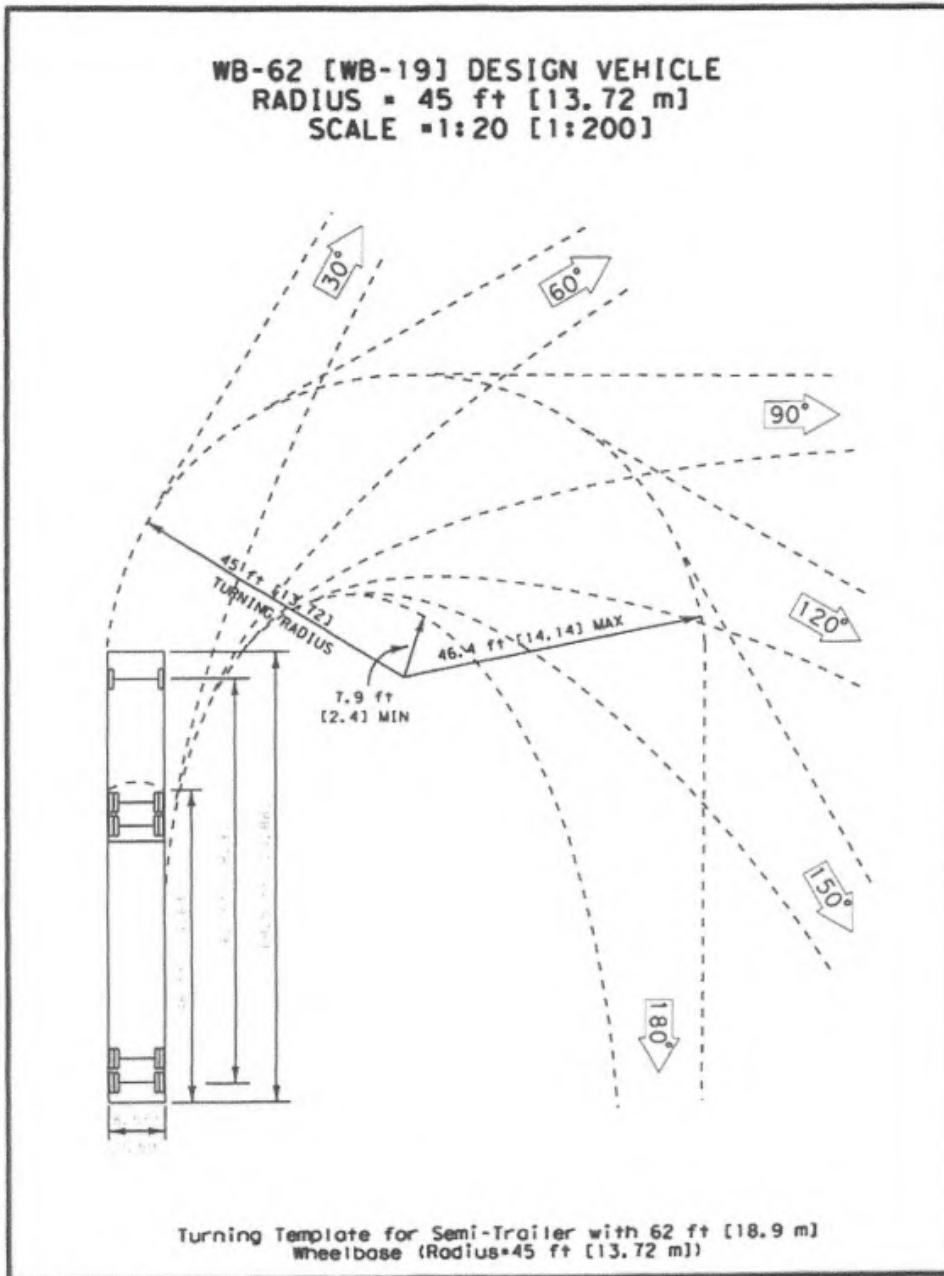
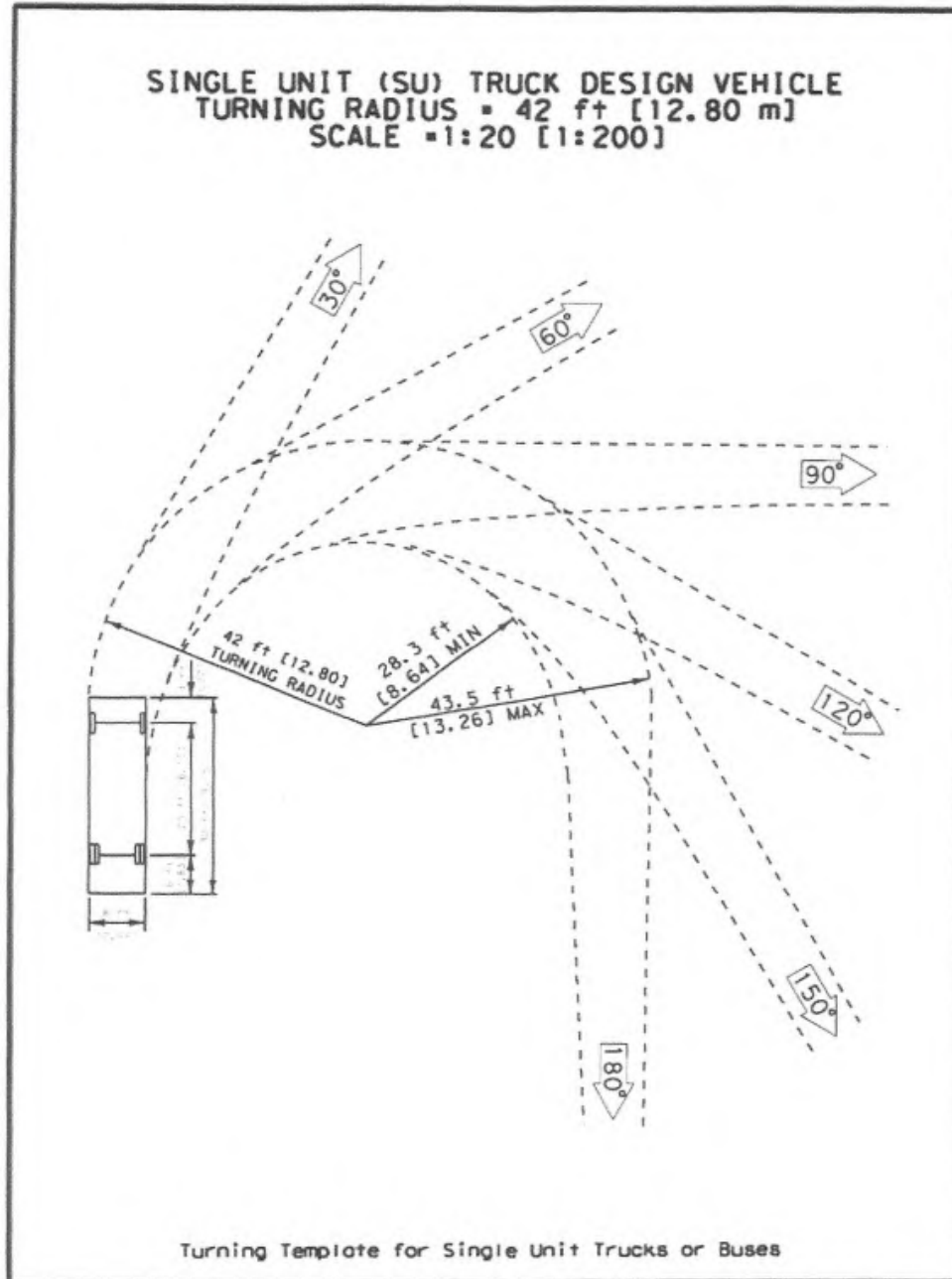


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14



**CITY OF LA GRANDE
ORDINANCE NUMBER 3077
SERIES 2009**

Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

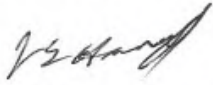
Section 17. TRUCK ROUTES

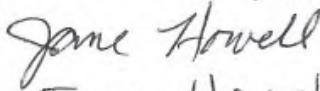
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

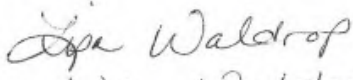
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

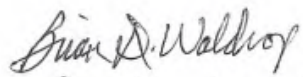
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

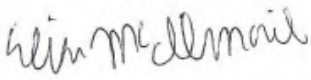
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
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EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
ADDRESS 475 MODELAIRES DR.
EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRES DR.
EMAIL mcilmail154@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

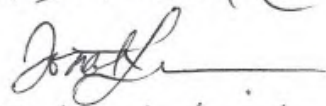

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

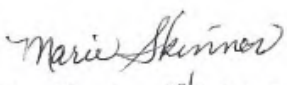

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

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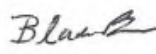

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

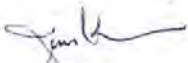
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EMAIL

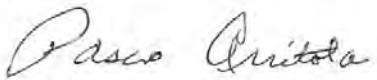

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

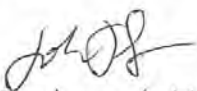
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SIGNATURE 
PRINTED NAME Dale Mammen
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SIGNATURE 
PRINTED NAME Jim Kreider
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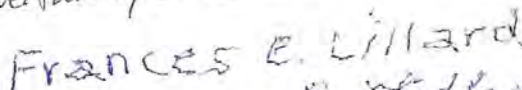
SIGNATURE 
PRINTED NAME Judie Arritola
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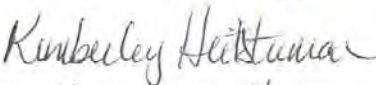
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ADDRESS 486 Hawthorne DR, La Grande
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SIGNATURE 
PRINTED NAME Frances E. Lillard
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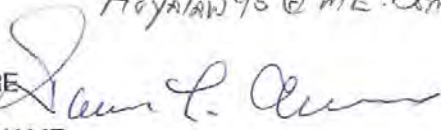
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ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

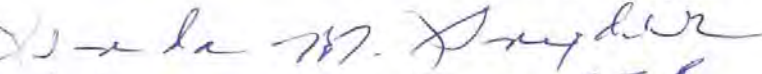
SIGNATURE 
PRINTED NAME M. Jeannette Smith
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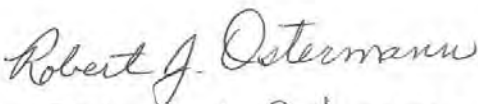
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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EMAIL kimheitstuman@hotmail.com


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SIGNATURE: 
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SIGNATURE 
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ADDRESS Lonnie L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

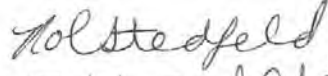
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ADDRESS 491 Modelaire
EMAIL

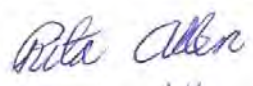
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PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
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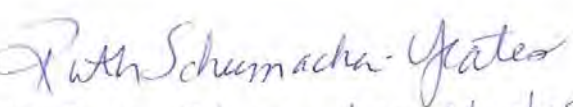
SIGNATURE 
PRINTED NAME Robin J. Ostermann
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EMAIL

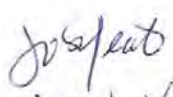
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
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SIGNATURE 
PRINTED NAME Robin Stedfeld
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EMAIL rstedfeld@yahoo.com

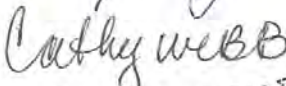
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ADDRESS 410 Balsa St. La Grande Or.
EMAIL

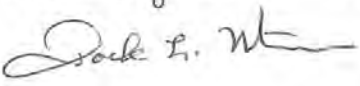
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
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EMAIL ruthschumacheryeates@gmail.com

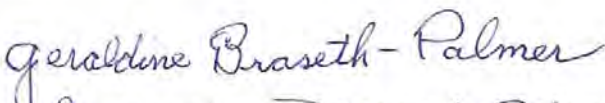

SIGNATURE 
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ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

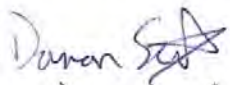
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

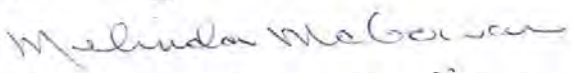
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 Goldenest Drive LA GRANDE, Ore 97850
EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jbaph19@gmail.com

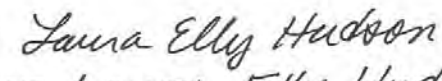
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL Sexton.damon@gmail.com

SIGNATURE 
PRINTED NAME Cory Sexton
ADDRESS 401 Balsa Street La Grande OR 97850
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SIGNATURE 
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE 
PRINTED NAME Keith D. Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL Keithdhudson@gmail.com

SIGNATURE 
PRINTED NAME Laura Elly Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL ellyhudson@gmail.com

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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 v1wd1910@gmail.com

SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
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EMAIL acavinat@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR
EMAIL joehorst@ecni.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, LaGrande, Or. 97850
EMAIL asherei@frontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Modelaire Dr. La Grande, OR 97850
EMAIL hnull@comi.com

SIGNATURE *Bert R. Frewing*
PRINTED NAME Bert R. Frewing
ADDRESS 709 South 12th Street LaGrande, OR 97850
EMAIL jeanfrewing@gmail.com

SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay 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 2009 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*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Belketer 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 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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PRINTED NAME
ADDRESS
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

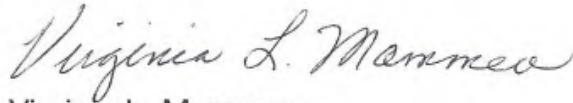
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰ These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable.¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

Sincerely,

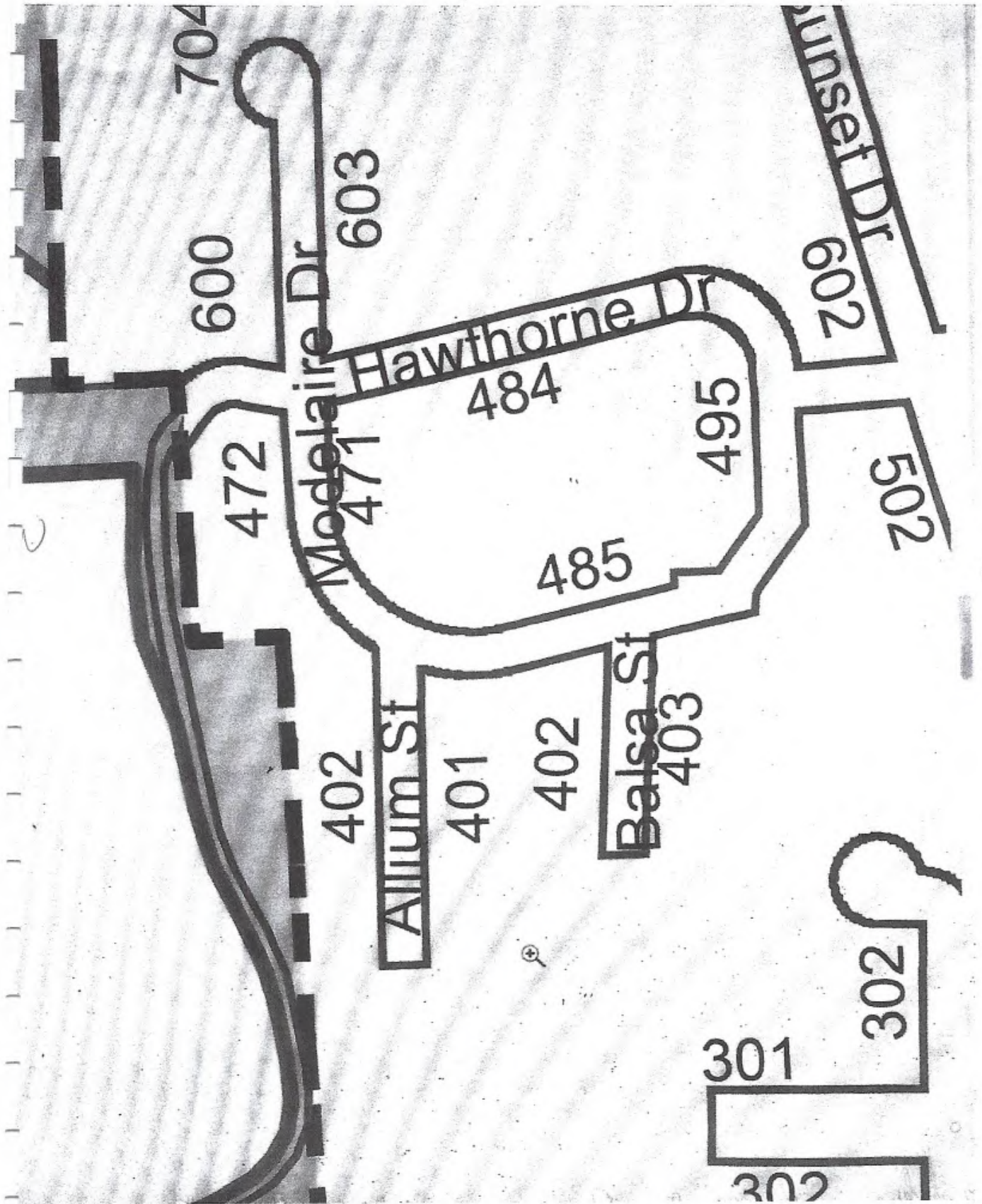


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

3.3 Predicted Noise Levels

OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation of the proposed facility.

3.3.1 Construction Noise

3.3.1.1 Predicted Construction Noise Levels

Project construction will occur sequentially, moving along the length of the Project route, or in other areas such as near access roads, structure sites, conductor pulling sites, and staging and maintenance areas. Overhead transmission line construction is typically completed in the following stages, but various construction activities may overlap, with multiple construction crews operating simultaneously:

- Site access and preparation
- Installation of structure foundations
- Erecting of support structures
- Stringing of conductors, shield wire, and fiber-optic ground wire

The following subsections discuss certain construction activities that will periodically generate audible noise, including blasting and rock breaking, implosive devices used during conductor stringing, helicopter operations, and vehicle traffic.

Blasting and Rock Breaking

Blasting is a short-duration event as compared to rock removal methods, such as using track rig drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills. Modern blasting techniques include the electronically controlled ignition of multiple small-explosive charges in an area of rock that are delayed fractions of second, resulting in a total event duration that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.

Lattice tower foundations for the Project typically will be installed using drilled shafts or piers; however, if hard rock is encountered within the planned drilling depth, blasting may be required to loosen or fracture the rock to reach the required depth to install the structure foundations. Final blasting locations will not be identified until an investigative geotechnical survey of the analysis area is conducted during the detailed design.

The contracted blasting specialist will prepare a blasting plan that demonstrate compliance with applicable state and local blasting regulations, including the use of properly licensed personnel and the acquisition of necessary authorizations. The Framework Blasting Plan is set forth in Exhibit G, Attachment G-5.

Implosive Devices

An implosive conductor splice consists of a split-second detonation with sound and flash. Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be developed by an individual certified and licensed to perform the work. The plan will communicate all safety and technical requirements including, but not limited to, delineation of the controlled access zone and distance away from residences.

Exhibit 3

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

- This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety.
- Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



8/5/2019

Oregon Secretary of State Administrative Rules

Exhibit 4a

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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.

Exhibit 4b

8/5/2019

Oregon Secretary of State Administrative Rules

(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;

Exhibit 5a

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.

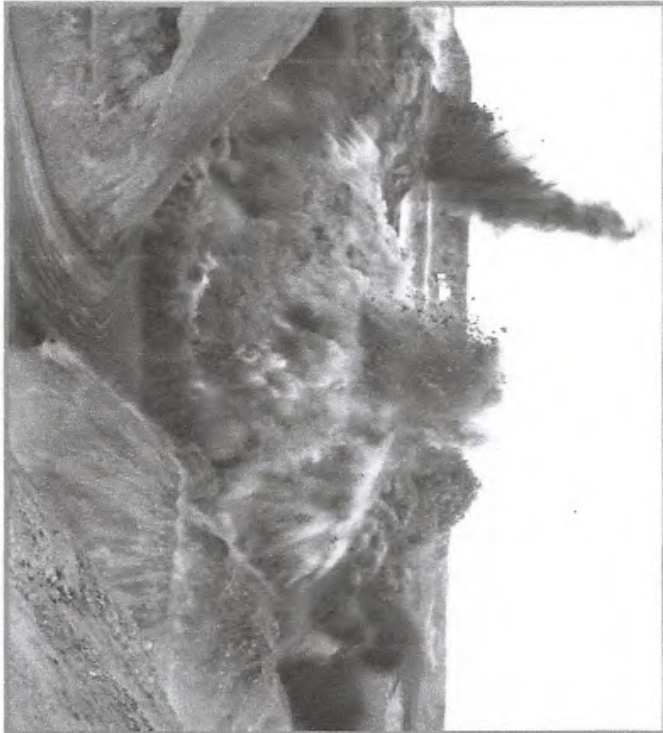
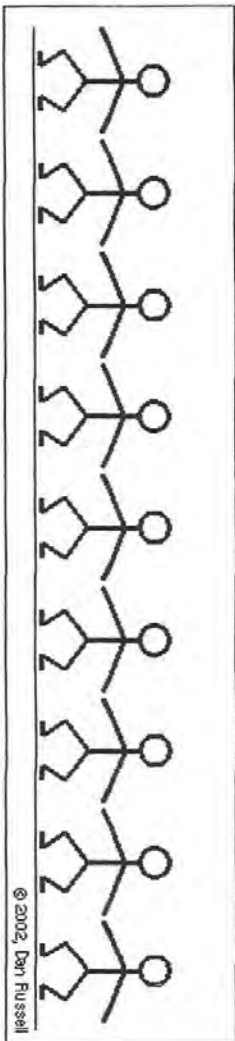


Exhibit 56

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.

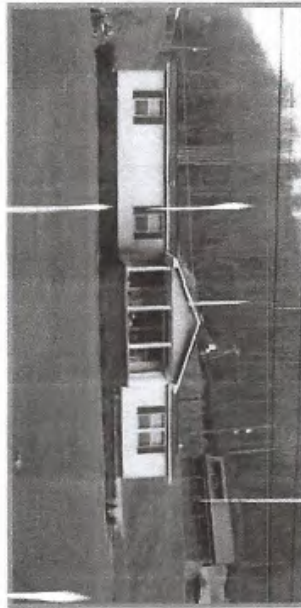
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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.

Exhibit 5g

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

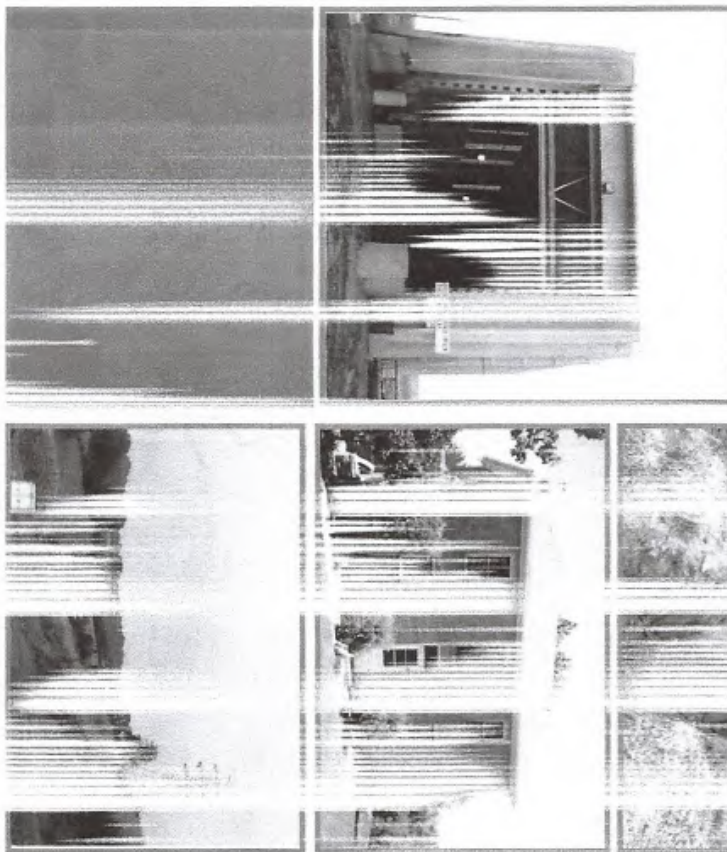
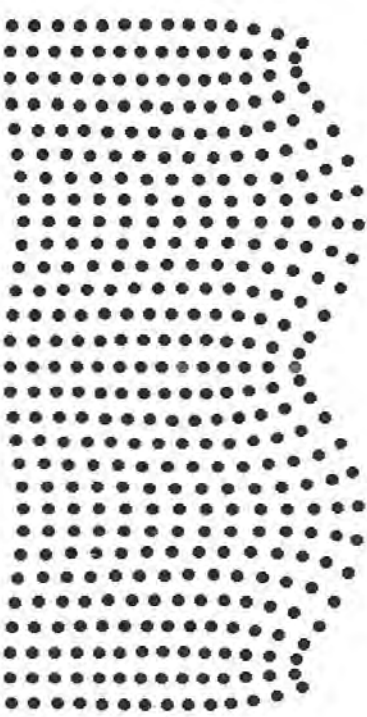


Exhibit 5D

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.

Structure Response

Exhibit 5 F

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

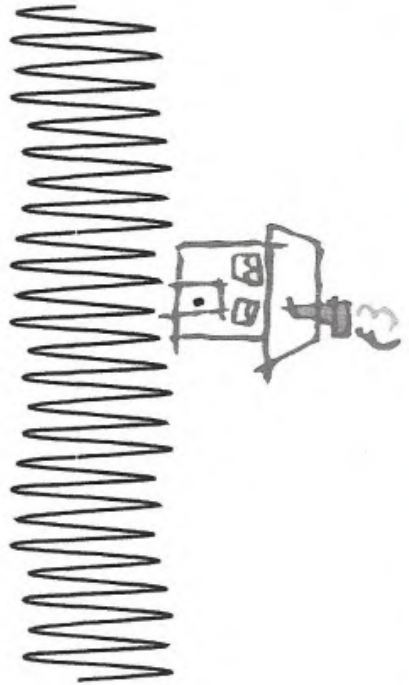
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

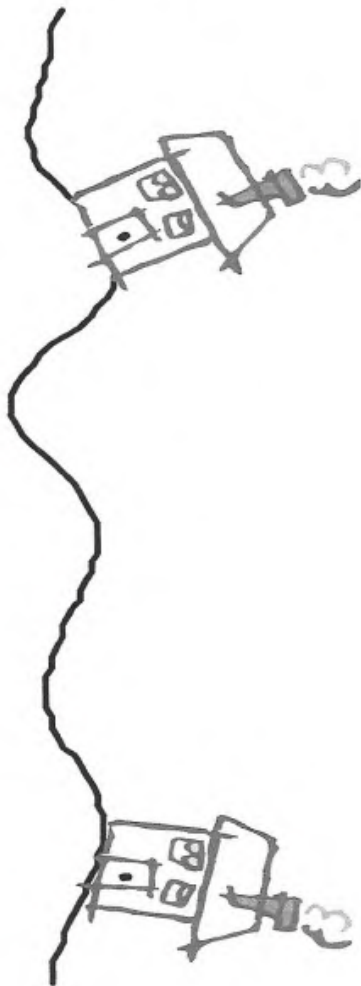


Ground Vibration Structure Response

Exhibit 5g



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.

8/4/2019



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A noisy problem - Harvard Health

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CONDITIONS

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HEALTH

WOMEN'S
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."

Exhibit 7a

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal



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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

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal

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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.

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

Exhibit 8a

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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



Exhibit 8b

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Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

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).

Exhibit 3

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Around the country, "quiet campaigns" have been launched by hospitals in an attempt to dampen nighttime noise. Besides dimming lights and asking staff to keep their voices down at night, they are working to eliminate overhead paging systems, replace wall and/or floor coverings – even the clang of metal trashcans. Northwestern's Prentice Women's Hospital in Chicago was built with noise reduction in mind, replacing the idea of centralized nursing stations with the advent of smaller, multiple stations (Deardorff, 2011)

Billed as "one of the nation's largest hospital construction projects," Palomar Medical Center in North San Diego County is a state-of-the-art facility that has been designed "to encourage quietness," according to Tina Pope, Palomar Health Service Excellence Manager. Slated to open its doors this August, the hospital will feature a new nursing call system to route calls directly to staff and help eliminate the need for overhead paging, de-centralized nursing stations and clear sig lines, allowing staff to check on patients without having to leave unit doors open. With measures already in place including "Quiet Hospital" badges on staff and posters at the entrance of every unit, a "Quiet at Night" campaign (9 p.m. – 6 a.m.), and a "Quiet Champions" program that encourages staff to report noise problems, Palomar is one of a growing number of hospitals working toward a new era of quiet.

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8/6/2019

<https://knops.co/magazine/noise-and-ptsd/>

Exhibit 9
a



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

Exhibit 9b

8/6/2010

trauma or flashbacks.



Fear

PTSD can also cause a general fear of sounds: phonophobia, or a fear of some specific sounds: misophonia. Survivors of the disorder also are generally much more sensitive to sounds and perceive them as much louder than other people would.

All of this makes the life of people with PTSD very hard. If you think you are suffering from this, consult your doctor. Really, please do it. For yourself, and for the ones you love.

Do you have PTSD and would you like to tell your experiences to us? We are always very open and interested to hear what you have to say. And again: if you haven't done it yet, visit your doctor, please. Thank you!

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8/4/2019

Does noise affect learning? A short review on noise effects on cognitive performance in children

Exhibit 10a



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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This article was submitted to *Developmental Psychology*, a section of the journal *Frontiers in Psychology*.

Received 2013 May 14; Accepted 2013 Aug 12.

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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

8/4/2019

Does noise affect learning? A short review on noise effects on cognitive performance in children

EXHIBIT 1012

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,

8/4/2018



Walk Donate Q

Exhibit 11a

Autism & Anxiety: Parents seek help for extreme reaction to loud noise

September 5, 2018

Our 12-year-old son has autism, mild intellectual disability and anxiety attacks so severe that we end up in the emergency room. Loud noises are the worst – for example the school fire alarm, thunderstorms, a balloon popping, fireworks. Any help would be greatly appreciated.



This week's "Got Questions?" answer is by Judy Reaven, a clinical psychologist and associate professor of psychiatry and pediatrics at the University of Colorado School of Medicine and Children's Hospital Colorado, in Denver. Dr. Reaven's conducted research on the effectiveness of cognitive-behavioral therapy for anxiety in adolescents with autism, with the support of an [Autism Speaks research grant](#).

Editor's note: The following information is not meant to diagnose or treat and should not take the place of personal consultation, as appropriate, with a qualified healthcare professional and/or behavioral therapist.

Thanks for the great question. It certainly sounds like your family is experiencing a very difficult situation. Anxiety symptoms and reactions are very common in individuals with autism spectrum disorder (ASD). They can interfere with functioning across home, community and school settings.

Although your son's reaction sounds more severe than most, many people with autism struggle with a range of fears, phobias and worries. These can range from a debilitating fear of, say, spiders or the dark to chronic anxiety about making mistakes or being late.

Fortunately, recent research suggests that anxiety in children and adults who have autism is quite treatable. Often, these individuals are helped by the same or similar strategies that work well in treating anxiety in the general population.

These approaches include cognitive behavior therapy, or CBT. Cognitive-behavioral approaches are well-established, evidenced-based treatments that have become the gold standard of psychosocial treatments for anxiety. [My own research](#) and that of my colleagues has demonstrated the helpfulness of modifying cognitive-behavioral approaches to address the special needs of those who have autism.

Where to begin?

You describe a number of fears that may be related to sensory sensitivities. I recommend that you begin by consulting an occupational therapist who can assess whether your son's extreme sensitivities to noises are part of a broader sensory processing disorder. If this is the case, and if your son's fears are exclusively triggered by sensory stimuli, then his symptoms may be best addressed by a sensory-focused intervention. Many occupational therapists who specialize in autism receive special training in this area.

It's common for children with ASD and anxiety to become extremely frightened in response to sensory stimuli. Perhaps – like many individuals with autism – your son also has difficulty telling you what's scaring him. Instead, he may show his fear with extreme avoidance of a situation.

8/4/2011

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.

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Pages

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EXPERT
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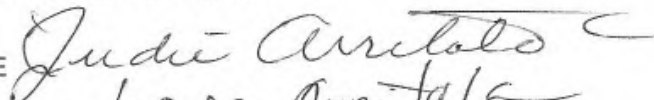


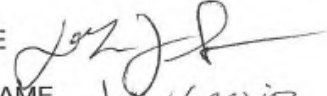
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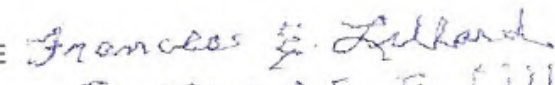
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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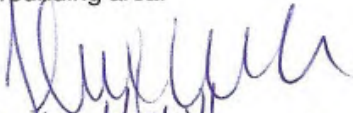
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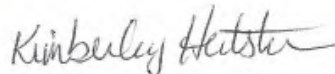
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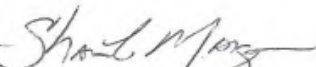
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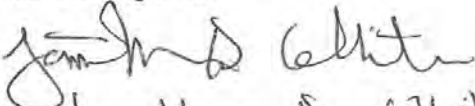
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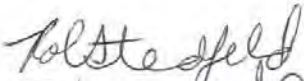
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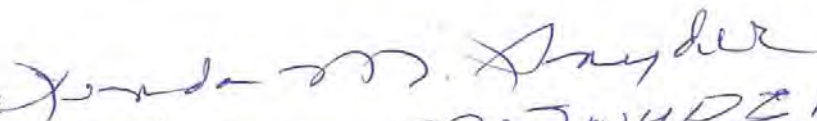
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EMAIL jondwhite418@gmail.com

SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Madelaine Dr. LaGrande
EMAIL rstedfeld@yahoo.com

SIGNATURE 
PRINTED NAME Lonnie L. ALLEN 541-963-7720
ADDRESS 410 Balsa Street LA GRANDE, OREGON 97850
EMAIL N/A NONE:

SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. LaGrande Or.
EMAIL

SIGNATURE 
PRINTED NAME Linda M. SNYDER
ADDRESS 491 17704241R
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 *Robin J. Ostermann*
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaine Dr La Grande, OR 97850
EMAIL

SIGNATURE *Robert J. Ostermann*
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaine Dr. La Grande, OR 97850
EMAIL

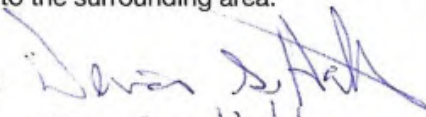
SIGNATURE *John Yeates*
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DRIVE LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

SIGNATURE *Ruth Schumacher Yeates*
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Dr, La Grande
EMAIL ruthschumacheryeates@gmail.com

SIGNATURE *D. Dak Mammen*
PRINTED NAME D. Dak Mammen
ADDRESS 405 Balsa. La Grande, Or.
EMAIL dmammen@conic.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE



PRINTED NAME

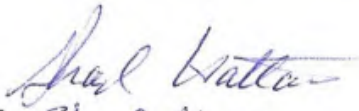
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

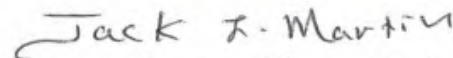
ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



PRINTED NAME

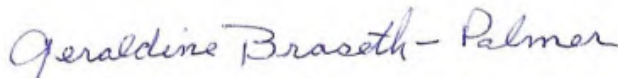
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

GERALDINE BRASETH-PALMER

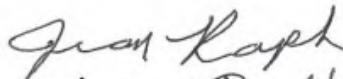
ADDRESS

1602 Gildcrest Drive - LaGrande, Or; 97850

EMAIL



SIGNATURE



PRINTED NAME

Jean RAPH

ADDRESS

1509 Madison Ave LaGrande, OR 97850

EMAIL

jraph19@gmail.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Damon Sexton*
PRINTED NAME Damon Sexton
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EMAIL sexton.damon@gmail.com

SIGNATURE *Coy Sexton*
PRINTED NAME Coy Sexton
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SIGNATURE *Melinda McGowan*
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
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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
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EMAIL acavint@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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EMAIL joehorst@conic.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
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EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
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EMAIL rmaille@icloud.com

SIGNATURE *Carol 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 97w Hawthorne Dr, La Grande, OR 97850
EMAIL asherer@frontier.com.

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 madelaire Dr. La Grande, OR 97850
EMAIL hnull@conic.com

SIGNATURE *Bert R. Frewing*
PRINTED NAME Bert R. Frewing
ADDRESS 709 South 12th Street La Grande, OR 97850
EMAIL jeanfrewing@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

ESTERSON Sarah * ODOE

From: lois barry <loisbarry31@gmail.com>
Sent: Thursday, August 22, 2019 9:15 AM
To: B2H DPOComments * ODOE
Subject: Noise at Morgan Lake Park

August 22, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

I live on the Morgan Lake Road. Morgan Lake Park is about two miles from my home. At least once a week for the past 40 years, almost daily in the summer, I have walked the east side trail at Morgan Lake. I know the park well, and I especially cherish the absolute silence of this secluded natural area. During the past 40 years, the tranquility of the park has not changed.

I have studied DPO Attachment X-4, pp. 3/5 & 4/5. From my understanding of this attachment, every location in Union County which would be crossed by the B2H Morgan Lake Alternate Route was monitored with the same noise sensitive receptor (NSR) at milepost 11. This single NSR would provide exactly -- and unrealistically -- the same reading for the Husky Truck Stop, where heavy freight trucks from adjacent I-84 stop for gas and park for the night with diesel engines rumbling, and Morgan Lake Park, several miles to the west at the top of a relatively isolated two lane county road.

At Morgan Lake Park, the camp host closes the gate each night at 10:00 to ensure quiet. Visitors often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, generators and shooting are not allowed, and no motorized craft are permitted on the lake. Even when the campground is full, it's possible to picnic, fish, hike or camp while enjoying the absolute silence of the surroundings. The Morgan Lake Park Recreational and Development Plan even cautions against loud voices that might disturb park visitors: <https://drive.google.com/open?id=1eDDbGDjINZT8jiEvY-l6MRUsLgtq28cl>

2. Breaching the public Peace. No person in Morgan Lake Park shall engage in abusive, insulting ... language or engage in any disorderly conduct or behavior tending to breach the public peace. Park visitors shall conduct themselves in a quiet and peaceful manner consistent with the natural atmosphere in which the park is set. (25/33)

I am profoundly concerned that the applicant has failed to include noise monitoring at Morgan Lake Park campground, a noise sensitive property within ½ mile of the development as required by OAR-340-035-0015(38). Noise Sensitive Property is “*property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries.*” This is a significant failure in the application. Morgan Lake Park, an overnight campground, is unquestionably a place where people expect to sleep, and furthermore, to sleep undisturbed. Eight towers supporting buzzing, popping, snapping transmission lines will

border the campground; the closest being .32 and .38 miles; the furthest one mile. I see no opportunity for adequate mitigation in this case.

Division 22

GENERAL STANDARDS FOR SITING FACILITIES

Energy Facility Siting Council - Chapter 345

345-022-0100

Recreation

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:

(a) Any special designation or management of the location:

See the Morgan Lake Recreational Use and Development Plan (above), and ASC p. 145 (T-4-46): Baseline condition: “... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users.”

(b) The degree of demand:

From the City of La Grande’s current web site: *Morgan Lake: Atop a mountain just a few minutes’ driving time from the heart of the city, Morgan Lake offers a quiet, motor-free respite from daily cares, with camping, fishing and hiking opportunities. ... Morgan Lake is located just a few miles outside of La Grande and provides the citizens of Union County an inexpensive, easily accessible area for a broad range of outdoor recreational activities, including fishing, camping and nature hikes.*

City records show that in summer, an average of 200 vehicles use the Morgan Lake Road daily. Camping has become so popular that new campsites were added in 2017 (now total of 12) and the overnight limit decreased from 7 nights to 3 nights. Campers are often turned away.

Popular annual XTerra competitions and fishing derbies, as well as “music on the lake” are welcome activities at the lake.

(c) Outstanding or unusual qualities:

c) A free 204 acre park with two natural lakes, located in a natural setting at the top of the hills within a 10-15 minute drive of 13,000 city residents is definitely unusual. Special fishing and camping facilities are provided for handicapped visitors. Because it is often 10 degrees cooler than the town below, it is a welcome respite from summer heat.

(d) Availability or rareness:

See (c) above, and *Morgan Lake Park is an important opportunity primarily because of its unique designation status as a city park, rareness, and special qualities per OAR 345-021-0010(1)(t)(A) Attachment T-3, Table T-3-1 (p. T-13).* The exceptional natural features of the lake are addressed in another comment.

(e) Irreplaceability or irretrievability of the opportunity.

Applicant rates Morgan Lake Park as “*somewhat irreplaceable*,” a curious designation. “Irreplaceable” is an absolute: synonyms are “unique, unrepeatable, incomparable, unparalleled, priceless, invaluable.” Irreplaceability, like pregnancy, is either/or, not “somewhat.” There is no question that Morgan Lake Park is irreplaceable.

All of the information listed above clearly indicates that Morgan Lake Park is an “important recreational opportunity.” Nevertheless, applicant concludes that “impact on recreation” of permanent noise pollution

caused by multiple towers supporting buzzing, popping, snapping transmission lines, some within .3 miles of Morgan Lake Park's overnight camping area, will be "less than significant."

Commission should not allow applicant to leap to spurious self-serving conclusions when the preponderance of evidence indicates the contrary.

When organized opposition in the city of La Grande made applicant's proposed Mill Creek Route seem untenable, applicant offered the city of La Grande \$100,000 mitigation if they would support the Morgan Lake Alternate Route. At a La Grande City Council meeting, the Park Department Director, Stu Spence, was asked what he could use that money for. He could only suggest "perhaps an additional restroom or more porta potties." Clearly this is a park that does not need mitigation for development, quite the contrary. It should be protected from intrusions. Development, as the Morgan Lake Recreational Use and Development Plan indicates, should be minimal.

Division 22

GENERAL STANDARDS FOR SITING FACILITIES

Energy Facility Siting Council - Chapter 345

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order.(R-1)

Mitigation for an industrial intrusion into the silence of a natural park setting is not possible. To preserve this rare and beautiful natural recreational opportunity, it is essential that EFSC deny site approval of the Morgan Lake Alternate Route. This alternate route was not carefully analyzed, as I have demonstrated in another comment (this date). Unsupported conclusions were presented without complete and credible data.

Documentation of the Morgan Lake Alternate Route is a cursory effort, hastily proposed as a back up in case the Mill Creek Route -- which poses many additional serious problems as well, including geologic and fire hazards; unacceptable impacts on local residences, the Oregon Trail, and natural resources among many others - - was not approved.

The Commission should not be constrained by the false choice of applicant's two chosen routes. EFSC denial of these negligibly evaluated and inadequately documented routes will not prevent applicant from meeting the "needs" of their proposed project. In the unlikely event that construction of the B2H is ever approved, the BLM Environmentally Preferred Route would avoid virtually all of the impacts and necessary mitigations of the Mill Creek and Morgan Lake routes.

I urge the Commission to deny both of applicant's routes until, at a minimum, a Supplementary Environmental Impact Study (SEIS) of applicant's proposed and alternate routes has been completed.

Lois Barry
loisbarry31@gmail.com
PO Box 566
La Grande, OR 97850

ESTERSON Sarah * ODOE

From: lois barry <loisbarry31@gmail.com>
Sent: Thursday, August 22, 2019 3:43 PM
To: B2H DPOComments * ODOE
Subject: Comment on B2H Application

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I and many others have commented on Idaho Power's application for the Boardman to Hemingway transmission line, identifying many of the consequential aspects of the ASC and DPO, realizing that additional time and resources would have allowed us to further investigate more topics of concern.

It's evident that much of this "public comment" opportunity is window dressing appearing to fulfill the letter of the law, but certainly not the spirit of active public participation. Applicant's initial efforts to overwhelm rural county planning offices with a deadline of 30 days to respond to 240 lbs. of documentation (lacking both indices and pagination) should say it all.

With limited time and resources local citizens, concerned with protecting our environment, heritage and lifestyle from massive disruption by an Idaho Corporation, have done our best to inform and involve our neighbors while reading, researching and writing responses to the ASC and DPO. EFSC's requirement to cite relevant rules, standards and regulations as essential to validating Comments is daunting to the average citizen and discourages public response. Surely EFSC staff has adequate experience to determine whether a citizen's comments are valid?

One major concern is that the DPO, a summary of the ASC, accepts applicant's conclusions without essential analysis. As it is:

- 1) the DPO identifies an area that might be impacted by the proposed route,
- 2) provides a flurry of citations referring to the process of analysis and the possible degree of impact,
- 3)
- 4) usually followed by applicant's conclusion of "no significant impact" or

5) proposed mitigation which would result in a conclusion of “no significant impact.”

This process is missing 3) in which applicant should be required to provide credible statistical or visual documentation to support each and every conclusion. “Just because it’s written down, doesn’t mean it’s true.” Without the missing component of step 3 the entire application process is a sham. Step 3 is the essential point at which applicant must prove the validity of their conclusions.

Conclusions based on inadequate monitoring, invalid assumptions, omissions and misrepresentations are not acceptable. This practice is so frequent that it seems applicant has reason to believe only a perfunctory effort is necessary because EFSC route approval is assured. The Council must make Idaho Power prove their assertions and support their conclusions. As a part of evaluating route applications, ODOE has a responsibility to the citizens of Oregon to “protect their environment and public safety.” That does not involve automatic acquiescence to every project before it.

In the ASC and DPO we have identified among many other problems:

- visual impact analysis without photo-simulations
- noise monitoring without appropriately located sensors
- archeological analysis without on-the-ground surveys
- geological analysis omitting known slide and fault areas
- meaningless maps without landmarks or streets labeled
- inadequate notice to individuals whose properties will be affected
- excessive reliance on small public service agencies to fight fire
- exaggerated expense & worst-case scenarios used to avoid mitigation
- failure to evaluate impacts on protected areas
- excessive reliance on mitigating problems after approval is granted.

As a part of this process, the basic question “Who benefits?” must be answered. This B2H transmission line that will cross five counties will have no off-ramps. No additional power source will be supplied. Will the B2H benefit the communities it will cross? Not at all.

Numerous Oregon regulations cited in the ASC contain this phrase: *to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact.* The “significant adverse impacts” of the B2H as we all have outlined them would be massive, destructive, and potentially dangerous.

Considering that the literal “need” for the B2H -- proposed more than 10 years ago to avoid an assumed power shortage to Idaho -- has evaporated year by year to the point of invisibility, this application should not even be under consideration.

Idaho Power’s ostensible “need” is being sustained by the corporation’s enduring greed. It’s understandable that a guaranteed profit of \$80 million is worth the paperwork to them, but it defies understanding that ODOE would even consider approving a transmission line requiring a 300 mile clearcut across five Oregon counties with all the attendant negative impacts on order to profit an Idaho Corporation.

I urge the Commission to deny this application for a site certificate until each comment submitted and sent to the Commission by August 22 has been thoroughly analyzed, and Idaho Power has provided credible evidence to support each of its conclusions. They say “No significant impact.” I say “Prove it!”

Lois Barry
PO Box 566

La Grande, OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Peter Barry

Mailing Address (mandatory) P.O. Box 566
LaGrande, OREGON

Phone Number (optional) () _____ Email Address (optional) _____

Today's Date: 6-20-19

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Page 82

1 reasons stated for this project in the first place,
2 which is enervation of variable power sources, such as
3 wind and solar into the grid and it will increase the
4 capacity that the transmission lines would have to
5 provide. You can read that, and I'll skip over to what
6 is going on with particular storage in the past
7 10 years.
8 I would like to start with 2008 or '09 when
9 Nissan Leaf came out with all-electric cars that weighed
10 2,000 pounds and went 100 miles. And then Tesla comes
11 along with a 4200-pound car that runs like a rocket and
12 did 300 miles. Then Tesla further, in the aftermath of
13 Maria in Puerto Rico, they supplied the hospital down
14 there with power until the juice got turned back on to
15 them.
16 Kodiak Island is an independent grid that was
17 run by diesel and now is being powered by renewables.
18 The John Day Dam on the Washington side had a project
19 permitted for a wind farm, and that wind farm would take
20 water from below the John Day Dam and back up above it,
21 therefore, making the John Day Dam a more efficient
22 battery. And then in Turkey, General Electric developed
23 an integrated project of solar, wind, and a gas turbine
24 to produce electricity.
25 It seems like this technology has moved rather

Page 83

1 rapidly. I think we are in the crossroads of whether we
2 need increased transmission or see if storage technology
3 is going to make that obsolete. There is going to be a
4 few more cards dealt in this. I've always thought at
5 this point in time this project just needs to be kicked
6 down the road and see what happens.
7 That's it.
8 HEARING OFFICER WEBSTER: Thank you.
9 Following Mr. Barry, we will hear from Steven
10 Clements.
11 MR. PETER BARRY: Yeah, I've got my 7 minutes
12 here. I'd really appreciate it if you guys would all
13 listen to me. Hanley, all you guys, I wish you would
14 all listen to me. Maybe you are all listening intently
15 but you are not making eye contact with these good
16 people who have come far and worked hard all day long,
17 and they deserve to be heard. And maybe some of their
18 comments are not germane and they are not perfectly
19 denoted by page and appendix and which tower that Idaho
20 Power dreamt up, but none of us want this line.
21 Who wants this line? Anybody?
22 UNIDENTIFIED SPEAKERS: Not me.
23 MR. PETER BARRY: Stand up and --
24 HEARING OFFICER WEBSTER: Mr. Barry.
25 MR. PETER BARRY: These people need to be

Page 84

1 heard.
2 HEARING OFFICER WEBSTER: And they need the
3 opportunity to do so.
4 MR. PETER BARRY: I'm just using some of my 7
5 minutes. I'll burn a minute or two for that one.
6 But I'm passionate about this. You have seen
7 this beautiful valley. Hanley used to live here.
8 Unfortunately, he was a community planner, he didn't
9 protect the viewshed. But we're NIMBYs; right? Oh, we
10 don't want you going up our road, we don't want you
11 going on our land.
12 But 300 miles, 300 miles of Oregon and you
13 guys have a chance to derail this stupid idea. You can
14 slow it down, derail it, you know you can. You have all
15 of these different ways. You can allow contested case
16 hearings. You can look at all of the stuff Stop B2H is
17 going to submit. You can look at every one and go, Huh,
18 that's a pretty good point. Can Idaho Power really
19 prove that verifiably? Can they really prove it?
20 Ten years ago, more than 10 years ago they said, We want
21 to build this line. A for-profit corporation.
22 I used to think utilities were like a public
23 service agency. They brought you water and electricity.
24 We all love electricity. It turns out Idaho Power is a
25 terrible juggernaut. They wanted to plug up Hells

Page 85

1 Canyon, the last free-flowing stretch of the Snake
2 River, the last stretch. They lobbied hard. They spent
3 millions of their ratepayers' dollars trying to plug up
4 the last wide beautiful stretch of the Snake River.
5 Took it all the way to the Supreme Court of our land,
6 and fortunately, they had the wisdom to slam them back.
7 They wanted to build a coal-fired plant right
8 by Boise that has horrific air quality. Fortunately,
9 that was slammed down, too.
10 This is your chance to stop this stupid idea.
11 We are talking about should it be built here or there.
12 Oh, we love our view, we love our backyard. We love it
13 here. Maybe you don't, maybe you want to live
14 somewhere, that's fine, but we love this place. And 300
15 miles, and it's not federal land; it's public land, we
16 own it. We all own the federal land; right? It's ours,
17 it's yours.
18 And you guys have a chance, you have a little
19 slice of voice; we don't. We get our 7 minutes, that's
20 it. We can try to comprehend 20,000 pages of gibberish
21 while trying to raise a family and hold down two jobs or
22 raise four kids. That's what we can do. We can try to
23 discern this crap.
24 It's difficult. Have you guys, have any of
25 you read all 20,000 pages? Any of you? No one can do

Page 86

1 it. Your staff can't read all 20,000 pages. They each
2 have a section, they try to understand it, and then you
3 ask Idaho Power, What the hell does this mean? And they
4 go, This is what it means. No, really, we've got your
5 back. We will fill you in on that.
6 Have you heard of regulatory capture? That's
7 where their staff is interacting with your staff, day
8 and night, day and night, going out to lunch together,
9 and they become friends and colleagues.
10 And no disrespect to you or your staff, I
11 appreciate that you're doing this voluntarily. You come
12 all the way out here, and you went to Morgan Lake.
13 That's great you did that. We appreciate that. But we
14 want to stop this damn thing. There's no need for it,
15 and we can prove. There is no need for it. It would
16 cause -- as everybody has testified, it would cause
17 horrendous damage through our public land for our
18 great-grandkids, not just us, but our grandkids and
19 their kids. It would just be this ugly nightmare out
20 there.
21 And it's not just because it's ugly, I don't
22 want to see it. But we don't need it. We don't need a
23 300-mile long clear-cut. We don't need it.
24 If any one of you or me went to a doctor and
25 said, I've got a back pain. And they said, Oh, we have

Page 87

1 got a solution, we will just put a slice down your spine
2 and we can fix it. And you're like, Boy, that sounds
3 pretty bad. They go, Oh, we have another option. We
4 can slice down the other side of your spine.
5 Oh, that's our preferred grid and Mill Creek.
6 That's what we got. Thanks a lot. Slice away.
7 Then you go, I'm going to hire experts. And
8 for 2 years those experts study and study and study and
9 they spend \$20 million, the BLM I'm talking about. They
10 spent 20 million bucks to do this research on where is
11 the preferred route, not that it should be built or not.
12 Just if you're going to build the damn thing, where
13 should you put it.
14 All those scientists, all those analysts, all
15 those experts spending all that money and time, they
16 said, Build it way over there. Well, Idaho Power gets
17 to say, We don't care what you said. They paid for it,
18 they had to pay for it. Well, they didn't pay for it,
19 the ratepayers paid for it; right? The ratepayers had
20 to pay a lot of money for that study. They ignored it.
21 So that's like us going, we pay for all these
22 doctors to study and the doctors say, Oh, we've got a
23 much easier treatment for you. You're not going to take
24 that treatment, are you? You don't want to get cut
25 open, you don't want that treatment. And then someone

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1 says, You know what, we have an alternative, we have an
2 alternative solution.
3 This is 2018, and in another 5 years we
4 have -- we already have solar, wind; right? We have all
5 this stuff. We have storage. Every day it gets better,
6 it's amazing.
7 So if someone says, You don't need an
8 operation, we can fix you with new technology, every one
9 of us would grab that opportunity; right? Wouldn't we?
10 Or would we build this dinosaur because Idaho Power
11 wants to make 70 million bucks with PacifiCorp, owned by
12 Warren Buffet, a billionaire, he's a billionaire, and
13 Idaho Power is a for-profit corporation; right? I'm not
14 making this stuff up. This is true. They want to make
15 a bunch of money. Warren Buffet probably said he'd buy
16 Idaho Power if they shoved this line through or
17 whatever.
18 We don't want it. No one in Oregon called you
19 guys and said, Would you please build a big power line
20 across Oregon. Nobody said that; right?
21 Same with Cove Power, no one is saying, Please
22 build a pipeline across Oregon, across 200 creeks. No
23 one is doing that except these profiteers. I don't like
24 that, not personally, but I don't like corporations
25 shoving their power line through our valley and across

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1 my state. I love my state. I love Oregon. That's why
2 I live here. I'm sure you guys love Oregon, too.
3 So what I'm asking you, please, all of you,
4 please, when you hear an argument from Stop B2H, from
5 any of these good citizens or anyone else, please have
6 your staff analyze that material very, very carefully
7 and then call us back if there is any questions. Don't
8 just say, Idaho Power, oh, they've responded. Okay,
9 that's the answer.
10 I saw that with the PUC. They just asked
11 Idaho Power, How is that? And they answered. They
12 didn't ask anybody else, What's your opinion? What's
13 your view? What's the truth? Idaho Power lies, gives
14 half truths, misinformation. It's inappropriate.
15 Can you tell I'm angry? All these people are
16 angry, too, and a bunch more. We represent a tiny group
17 of people, a tiny group of people. So I'm asking you,
18 please help us slow this thing down, help us stop it.
19 I know you can't consider another intelligent
20 route, if there was going to be a line, it should be
21 somewhere else. I know you can't consider that, but we
22 need to kill this thing. It's a stupid, terrible idea.
23 You know it, I know it. The only people who want it is
24 Idaho Power and PacifiCorp, and BPA pulled out; right?
25 They are not telling anybody; right? Didn't they,

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1 didn't BPA pull out? It's not in their budget; right?
2 The third partner pulled out. Why did they?
3 They already cancelled the big power line, or a small
4 power line they were planning from Portland north into
5 Washington; right? They cancelled that one. Now they
6 pulled out, at least according to their budget, B2H
7 isn't in their budget anymore.
8 Anyway, we're not getting good information
9 from Idaho Power. You're not getting good information
10 from Idaho Power. Don't rubber stamp this thing. Don't
11 check it off the box. Went to La Grande, went to
12 Pendleton; rubber stamp, build the line. Don't do it,
13 please. Don't do it. This is your chance. You have
14 the power to help Oregon.
15 Thank you for listening.
16 HEARING OFFICER WEBSTER: Thank you.
17 MR. STEVEN CLEMENTS: It's kind of hard to
18 come up here after that. Thank you, Pete.
19 My name is Steve Clements. I'm the mayor of
20 La Grande. My address is 1000 Adams Avenue.
21 Before I start to speak, I want to thank all
22 the people that came up here and spoke this evening.
23 I'm particularly impressed by the background that they
24 have, the work that they have done. They are to be
25 commended for all the time that they've put in. It's

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1 amazing. What I know about this project comes to about
2 this much relative to what they know (indicating).
3 Anyway, thank you for the opportunity to
4 present this evening. The La Grande City Council, which
5 represents more than 13,000 people who will be
6 negatively affected by this transmission line, has
7 provided comments through staff, through our city staff
8 at each of the steps in the process; so you have some of
9 our input already.
10 I will reiterate some of that and add to it.
11 In 2019 and '17, the La Grande City Council, in
12 partnership with the Union County Commissioners,
13 conducted two public meetings in this very room to hear
14 from residents regarding the project in conjunction with
15 the amended preliminary applications. Public sentiment
16 expressed at those meetings overwhelmingly opposed the
17 transmission line. You are hearing some of that this
18 evening.
19 The bases for that opposition included, but
20 was not limited to, reduced property values to homes
21 along the proposed route; viewshed impacts throughout
22 the area; environmental impacts both during construction
23 and when the transmission line is operational; impacts
24 to recreational facilities such as Morgan Lake; and a
25 lack of public notice and involvement throughout the

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1 process.
2 The La Grande City Council has been clear in
3 its opposition to the project beginning with its first
4 correspondence with ODOE in August of 2017 and again
5 this past April in a proclamation that it made opposing
6 the line. The City has also been consistent with its
7 request that EFSC include mitigation to address the
8 City's concerns if the project is approved.
9 We very much appreciate the inclusion of our
10 staff's recommended conditions related to transportation
11 and the impacts to Morgan Lake in the draft proposed
12 order. We are hopeful that the transportation and
13 conditions resolve the concerns raised by the City and
14 Union County throughout the process.
15 Of the two routes identified in the
16 application, the applicant has selected Mill Creek, the
17 most impactful to La Grande. It will be visible up here
18 on our end of the valley as the proposed route.
19 And the Morgan Lake, which also impacts City
20 property because that entire Morgan Lake Park belongs to
21 the City of La Grande. We have spent a lot of money up
22 there keeping it and improving it as a recreational
23 opportunity for people in this county. That is the
24 alternative route.
25 And I cannot say this more emphatically: We

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1 oppose, the City of La Grande opposes both of those
2 routes. And while I realize that the BLM-preferred
3 route is outside of your consideration, and I appreciate
4 what you gave us as guidelines before, the City Council
5 is very concerned about the decision by the applicant
6 not to submit the route which has lower social and
7 environmental impacts than the two identified routes. I
8 cannot understand why that route was not put in there,
9 personally.
10 For the proposed route, we ask that a
11 condition be included to require H-frames. We are
12 talking about mitigation. Now, these are requests that
13 we put forward. This is going to be somewhat different
14 than what you and I agreed to.
15 But for the proposed route we ask that a
16 condition be included, so that's the one up here, to
17 require H-frames with a tower height no greater than 130
18 feet, with weathered steel between milepost 106/2 and
19 milepost 108/5. Idaho Power has indicated that they
20 agree to this level of mitigation.
21 For the Morgan Lake alternative, the draft
22 proposed order includes requirements for these same
23 H-frames between miles 5-7 of Morgan Lake as a
24 recommended condition. The City of La Grande would like
25 to express that as an alternative, the City would accept

ESTERSON Sarah * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 12:56 PM
To: peter barry; B2H DPOComments * ODOE; TARDAEWETHER Kellen * ODOE;
EFSCcomment@stopb2h.org
Subject: B2H application siting Comment --Do NOT approve siting for B2H --- submit comments for record

From Peter Barry,

To EFSC Staff and Council,

Staff, PLEASE do not recommend to the Council to allow siting in any fashion for the B2h application. This is on you, as they listen to you, and clearly do not have intimate knowledge of this application as do you, and it many issues, inadequacies, deceptions and Lack of Need.

Do not make ANY siting approval for the B2H because :

((Citations and examples of all of these issues are clearly delineated in the submissions by STOPB2H et al.))

1)Idaho Power and partners have fallaciously morphed the reason for 'need.' The for-profit Idaho Power and other two partner applicants, realized they could not 'justify' in any way the 'old need' so they invented a new one. It is based on virtually incomprehensible computer modeling that has been manipulated by them to produce the numbers they seek. The 'new' need is also not justifiable. At the very least, a neutral third party analysis of the computer modeling and all inputs and algorithms should be mandated before any further consideration of this application is made. DENYING THIS APPLICATION WILL HAVE NO SIGNIFICANT IMPACT.

2)The applicants proposal is rife with omissions, mistakes, misinterpretations, erroneous modeling, assertions and projections, and our right fabrications. These are well documented (citations) by others in other submissions.

3) After years of intensive investigation, with millions of dollars spent, the BLM experts, analysts and scientists in many fields, made a clear recommendation of a 'Preferred Route' which had the least impact on all resources. (note that the BLM was NOT tasked with determining 'need.') Idaho Power had said many times they would wait for the Final EIS before announcing their route. But less than 2 months (I believe it was less than two weeks) before the BLM made their announcement, Idaho Power conjured up an all new route right by LaGrande Oregon that had not gone through analysis, and declared it their choice.

When asked by the Council why they had not waited for the BLM Preferred Route IP representative claimed it was because of time constraints. Completely unbelievable. IP is suggesting they did not know what The BLM was doing (which route was being considered as the BLM priority route= Preferred route) even though they were involved and in communication throughout the process.

The Preferred Route would ameliorate a majority of impacts in the Union County segment near La Grande, and the Morgan Lake area almost entirely.

The Mill Canyon and Morgan Lake routes have not been properly studied nor has the public or Council had the data nor time to seriously these last minute additions. Further, they are not 'similar to' the others proposed alternatives, nor close enough to warrant the Applicant the ability to use other data and studies and apply to these terrible alternatives that have severe risks and huge impacts on the community and environment and are much less safe. Since these routes have been chosen by IP as their two routes of choice, they must be required to start the application process anew and propose these routes at the beginning of this new process.

Any siting of the BLM should have the Applicant chose the BLM preferred route as their proposal and not the 'least preferred' routes. It is clear that the way in which the process has been interpreted by the Council, it has become definitively biased against the interests of the Public, landowners, the environment and communities. EFSC should wield the common sense and regulatory power that they do have. Do not tell the Citizens it is 'not in the regulations.' EFSC has any number of potential and real ways to protect the people and the State. Or, are you telling the Citizens you are impotent in the face of any corporate interests? Regulatory Capture is causal in this lack of State agency action.

4) Idaho Power has actually lobbied against laws to encourage or facilitate proven alternative energy sources in the Idaho Legislature and also failed to implement proven energy saving measures in its operation and those of its customers. A failure of a Corporation to adequately serve its customers and the needs of the State are no reason for another State, in this case Oregon, to enable inept and profiteering behavior on the part of a private entity. In fact it is a substantial and 'reasonable' cause not to do so.

5) Energy use and need has been essentially flat and projections regionally and nationally indicate this trend will continue. That IP and its partners can leverage the siting process to game their rate payers out of approx. \$70 million in profit for their private investors, while simultaneously burdening rate payers with the bill for well over a One Billion Dollar plus construction fee, leads any common sense person to question IP and its other monopolistic partners motives in fluffing up their stock portfolios at the expense of consumers who have no choice in suppliers. In addition, not requiring a massive bond which would at least cover the huge costs of decommissioning and clean up of this almost certainly 'stranded-asset'---as in, an astronomical burden on tax payers and rate payers to clean up the damage. We know this happens with all types of mines and other industrial permitted activities. EFSC must require a bond more than sufficient to cover all potential exigencies.

6) While IP claims BPA is still interested in the unneeded B2H line, their most recent budget belies this claim. BPA does not include budgetary consideration for future involvement of the application and construction. EFSC should get guarantees from the BPA or stop all application process until the time full participation and funding (and bonding) is known. It is only normal prudence to not allow continued activity without clear agreements which are fully funded by all participants. We are all aware that the BPA has just recently ended commitments to build a 'necessary' transmission line and their state reasons are telling.

7) Death Spiral of conventional generation and distribution systems are well researched and documented and EFSC should not site the B2H without completed research relating to this phenomenon vis a vis the B2H application and near and long term energy economics. Basic realities should be of primary concern---not filling boxes on an application process. If you were a prudent investor would you sink more than a billion dollars in such a poorly documented and spurious scheme? I hope not.

8) IP must adequately prove to a very high standard that upgrading existing transmission capacity is not as useful and economically and environmentally beneficial to the State of Oregon, its Citizens and to the most probable and 'common sense' future of rate payers and the environment. It has not yet satisfactorily made this case. IP's basic argument distilled down to its foundation is : "we don't want to." Any reasonable person wonders if their profit motive vis a vis the B2H application and construction is driving their decision making process. As a 'for-profit monopoly' with the CEO and others holding stock they want to profit from, this is undeniably the case. It is in fact germane to have the documents and all communications between Pacific Corp and Idaho Power to know what plans Warren Buffet et al have communicated in buying out IP, or other schemes. The Public and the Oregonians who would suffer under this application have a right to know.

9) Climate Crisis should be the single over-riding criterion for the Council to consider any application. While some suggest the B2H might be useful for moving 'alternative energy' research indicates that energy users and rate payers benefit the most from local generation and distribution with the immense added benefit of not being subject to massive and cascading grid failures which are predicted to get worse. Large scale transmission grids are subject to large scale failures ---which are only becoming more severe with enemy hacking and ransom actions and demands by bad-actors. We have a grid that could be bolstered and protected. Siting 'old-school' technology of additional large scale transmission capacity only detracts from and slows the efforts for local and regional resiliency. Rather, using state of the art conservation and alternative energy sources is clearly the current best practice with immense benefits in every category.

10) Allowing any motion forward on this application should be done only if there is iron-clad proof of its unquestionable necessity. One additional reason, if you might for some reason need one, is that a huge amount of the line/route proposed by IP crosses a almost 200 miles of private property parcels (almost double that of Public Land). Most of these owners do not want the line on or even near their property. How many land owners---or Citizens of this State have written you and promoted this project? IP would use Eminent Domain to 'take' the owners land. Compensation is miserably paltry, so 'taking' is an accurate descriptor. The effects are long lasting-- perhaps for 50 or more years. As a Public agency designed to serve the Public....you must take this reality into consideration. We are a Nation and a State that honors and defends private property rights. Imagine this fabricated project being bulldozed through your homeland. Your role is protect the right of owners unless insurmountable needs are proven beyond any doubt. Clearly there are hundreds of unanswered questions and issues with this application-- to take others peoples land to give more profit to an out-of-state corporation.

11) The Public Lands that would be severely damaged and altered are also owned and held for all Americans, now and all future generations in perpetuity. These are not 'Federal or State lands', these are the Peoples' lands. The many impacts are massive, multi-dimensional, well documented, and very long lasting. EFSC should not approve any siting of this spurious project with so many questions concerning basic facts in the application, omissions, and out right fabrications in the application. The effects are certain, the claimed 'benefits' are spurious and flimsy.

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ESTERSON Sarah * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:05 PM
To: B2H DPOComments * ODOE
Subject: Fw: Siting application for B2H comments, include in the Record --- Please include in official comments for EFSC consideration

To the Staff and Commissioners of EFSC,

Do not read this unless you think you are open minded to some genuine, self reflection and evaluation of this important process. If you are as you appear -- self-certain, and so sure you are much more intelligent than the rest of Oregonians, than why waste your time on comments by an inferior. Though it should be easy and somewhat satisfying for you to flick aside any and all of my perceived issues.

Everything we each do, our choices, behavior, our actions, reflects our ethics. What are yours? This is a germane and fair question as huge impacts are effected by them.

Do you see your role simply as a Rubber Stamp bureaucrat? (I'm sure not. That would be simplistic and not reflect all that you know and do.) Yet, this is the sad and demeaning history of EFSC --- of your 'decision making.' Rubber Stamping. It is not really decision making ---- the decisions are made by the corporations that exploit (did I mean to say 'serve') the people and resources of the State, and exploit the natural capital and virtues of all future Citizens--- all for a profit. And you merely 'legitimize' these corrupt practices. (Are you apprised of and actively countering Regulatory Capture by the applicants in your role?) Have you EVER refused to site anything? Or, sited a project only after huge alterations that were asked for by Citizens or groups, or those effected? Please correct me with a few examples. Easy, right?

Wait! Are you going to quit reading already? Because.....? you do not like hearing the truth? Or maybe I am wrong.... just give it couple more paragraphs....a few minutes. (You want to read about Hanley's tarnished past, right?)

The recent Oregon State Supreme Court ruling clearly slapped you and your corrupt practices back a bit. We peasants were so pleased that you made rule changes to 'promote public access and transparency!' Well, you are right--you are smarter than all of us, because we are so easily duped. We believed you, and took you at your word! You actually did the opposite of what you said. Apparently the Citizens of this fine State must rely solely on the Court's justice after you meekly and predictably approve yet another terribly conceived and proposed plan for corporate profit. It serves the State? The Citizens? Are you unconscious?

Now 'Councilor' Hanley Jenkins was unfortunately the County Planner for Union County for some years. He did nothing during his tenure to protect the County from onslaughts such as the B2H --and we can all only predict that he will vote to Rubber Stamp this profit-grabbing, un-needed project that will harm his very own neighbors and fellow Citizens. (oh, right...ex-neighbors, he moved.) Why is this so certain? Because he was instrumental in tearing down a purpose-built structure in La Grande

that was only 15 years old. Who would do that? And why? Because he and the other good ol boys in the County could not see past their own first 'plan' and their own short-sightedness----and in spite of huge protests and multiple alternatives, chose to site the new courthouse, right where the protective center for the most abused citizens among us, were assisted in their most profound time of need. Right Hanley? Tear down an almost new Abused Womens and Children's Center, that was perfectly located next to the Police Station. The good people of Union County know they will not find a 'defender' in this man with so little heart or imagination.no, no hope can be expected from this much-detested and reviled mr jenkins. He owns what he wrought...as do you.

Now the rest of you --- not so well known on this side of the State ---- of the eastern part of the East/West divide.... but we got a glimpse into your hearts when you came to the meetings in our towns. Truly disgusting behavior on your part---shame on you. To pretend to hold 'listening' hearings. (" it is required " ---the 'dog and pony show,' ...for some silly reason it is in the damn regulations.) I am certain you did in no way fulfill the important and legal duty to promote Public input.

Worried Citizens, some scared, some angry, some well researched, came to be heard. People almost always said " Thank you for coming to listen to us tonight." But it was absolutely clear that you were not listening, and were not hearing, and clearly did not care. All people are aware when they are, and when we are not being listened to. In those few hours each of those nights, you tore down our Democracy bit by bit. I watched you all carefully. Watched while you tapped away on your laptops, or wrote something or the other on paper...clearly having nothing to do with the people in front of you. I and others were enraged and disgusted. You all should have been tarred and feathered, at the least. Would that not be justice for your disrespect of your fellow Citizens? You are lucky that these good folks are indeed respectful....unlike yourselves.

What exactly are you doing on this Council? Do you have any understanding of the projects or actually care about the costs and impacts on our State--- our environment , our people? I would like to quiz you about some obvious facts about the B2H and see how many you can answer. Are you willing? So why are you on this Council? Certainly not 'service to the Citizens of the State! Service to the corporate interests? You say, 'no'. What then? How are you serving us now? The future?

You will not read the hundreds of legitimate, well cited, arguments presented to you. We can be certain of this. We suppose you must instruct the staff to do their best to come up with at least some reason each and every argument, concern, and point are without any merit, and once again ink-up your well used rubber stamp. You all are so sadly without ethics, and so predictable.

It may seem harsh...but this seems somehow appropriate. I want to promise each of you will I will post in the ubiquitous and never dying digital sphere, your 'decisions.' That you abrogated your sacred trust. You squandered your little bit of power to serve the monied interests over the People and the Planet and the future. I will do it to provide a small--- a very very small, bit of Justice. And therefore your children, family and acquaintances will know the truth about you, and so maybe they will strive to do right... to right your huge and inexcusable wrongs.

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ESTERSON Sarah * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:10 PM
To: EFSCcomment@stopb2h.org; TARDAEWETHER Kellen * ODOE; B2H DPOComments * ODOE; peter barry
Subject: Idaho Power application B2H Official Comments Plz include in the Record-- EFSC Comments

To EFSC Staff and Councilors,

EFSC staff should recommend to the Council to NOT ALLOW SITING of B2H transmission line. Application should be denied based on the following, and including all the other objections also filed by others. (Because average Citizens have limited time and expertise to research and respond to such a complex and convoluted application and process---a 'reasonable person' can plausibly project that there are many other inadequacies, errors and failures in the application that the working Citizens just have not had the time to yet uncover. These and others objections submitted are only a small representation of the failures of this damaging and un-needed project.)

In the Union County Planning Document:

Agriculture:

"4. That the rural character and farming activities of agricultural 'uses will be protected to preserve the scenic attractiveness and economic, social and physical living conditions desirable to farm families."

Where as the B2H proposed routes would cross many privately owned and operated agricultural parcels, and would definitely negatively impact one, some or all of the rules, values and stipulations in the County Plan described in #4, on some or all of the parcels, and no appropriate nor reasonable mitigation has been proposed to protect the values protected within this Plan.

For the scenery aspect, Specifically, OAR 345-022-0080, in describing Scenic Resources, states "the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans...." Has the applicant consulted with land owners concerning scenic impacts. Have they consulted with County officials on mitigation? There would be 'negative impacts, with out any doubt. The applicant has not proposed any mitigation solutions to address these negative impacts that are protected against in the County Planning document.

The applicant has not adequately or substantively addressed "social and physical living conditions to farm families" in its application. These aspects are inarguably fundamental to all Humans worldwide and are the basis for 'quality of life.' Nowhere in the application are the highly important social living conditions protected in the Union County Plan addressed in any meaningful way. Clearly research

into these negative impacts are needed prior to any approval for as site certificate. Anybody who has owned a home or land, especially agricultural land, can attest to the fundamental importance of 'the Home Ground', especially the connection and value of 'the families land' that has often been passed down through generations. These agricultural land are the core and center of families and therefore whole communities. Where in the application are these values (which are elucidated and protected in the County Planning document cited above), discussed and mitigated, as if that were even possible.

These attributes and concerns for the enshrined 'protection,' in this foundational County Planning document, also apply to "physical conditions desirable to farm families." No where in the application are the realities of the proposed massive intrusion into agricultural lands owned by families that would be negatively impacted adequately addressed. How many farmers have come forward in this process to approve of having their land invaded by a massive clearing, the effects of roads on soils and crops, herbicide use beyond their own control, 130' to 180' towers, massive loud wires/cables that cause noise pollution, visual blight and are a greatly increased risk for equipment use and wildfire?

Having a massive 'swath' bulldozed across many families' own home-ground, and having the unwanted intrusion/invasion of a Corporation planning to make money off of the certain degradation of a persons family property, is truly negatively significant. The impact is not transitory nor minor, but the exact opposite. A daily reminder of ones 'failure' to protect ones own family land from this wanted invasion is counter to the stated protections and in no way be considered 'desirable' as stated below: "That the rural character and farming activities of agricultural 'uses will be protected to preserve the scenic attractiveness and economic, social and physical living conditions desirable to farm families."

These protections and the obvious significant impacts are not addressed nor mitigated and no justification of any exception is warranted. The applicant does not comply with Applicable Substantive Criteria in the Land Use Standards in 345 022 0030 nor the Statutory Authority mandated in ORS 469.470 or 469.501 or any others. The application must be denied.

The applicant does not address the County law, nor mitigates the severe and obvious significant adverse impacts that protects these individuals rights clearly stated in the Planning Document.

These are just some of the many risks and negative impacts that do not comport with the "physical conditions desirable to farm families." Agricultural work is already extremely difficult and demanding work, and the negative effects of the applicants proposal on basic irrigation practices (pivots movement, handlines safety risk, etc), on the movement and control of livestock with changes in fencing and gates required, loss of shade trees for livestock in any ROW (right of way) clearing, weed issues caused by soil disturbance (weeds growing on the ROW) would cause airborne seed dispersal, and seeds would be are transported by IP equipment. Inadequate plans by the applicant and lack of any substantive mitigation for significant adverse impacts to of economic loss, much less any attempt at an accurate estimate in the application of true economic loss to farmers, ranchers, timber owners, does not comply with 345 022 000 or any other law concerning accounting or mitigation of economic impacts protected under the County Planning document.

Perhaps most significant and not addressed in the application adequately and without appropriate mitigation is the 'taking' (aka 'purchasing') easements, especially unwilling sellers--through Eminent

Domain. That Humans have always been closely tied to the land, and to certain parts of the land, to the point that these lands become 'sacred' is without dispute. Nowhere in the application are the County 'protections' of this and other 'condition desirable to farm families' addressed adequately or somehow mitigated.

The Application should therefore be denied.

It is 'reasonable' to conclude that these protected and valued attributes ascribed in #4 apply to 'rural and farming' character and activities--- are also valued by the many small rural/agriculturally based communities adjacent to or nearby to these areas proposed to be effected by the applicant in this stupid proposal. Choosing the most narrow and limiting interpretation of Protections and intent in Plans and such, does not serve the populace nor the State. Just as choosing the most generous interpretation for applicants and assuming that mitigation will be preformed as assumed or described at some later date is also unreasonable, inappropriate and does not adequately serve the populace, the process as intended nor any fair or reasonable form of due diligence. Is EFSC a robot? A robot remotely controlled by Idaho Power? The "intent' of the rules, laws and practices should be the applied standard. The actual and reasonably realistic negative impacts should be the core of evaluation and decision making.

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Just this one aspect of the law in the Union County Plan document is reason enough to deny this application for siting. Of course there innumerable other germane and significant reasons to deny this application which have been presented to you.

Do the right thing, Deny this Siting Application.

Peter Barry
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ESTERSON Sarah * ODOE


From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 3:11 PM
To: TARDAEWETHER Kellen * ODOE; efsccomment@stopb2h.org; peter barry; B2H
DPOComments * ODOE
Subject: B2H comments for the Record-- Application by Idaho Power/b2h/ DENY

To EFSC Staff and Council,

Do NOT approve any siting of Idaho Power application for the reasons below, and the many, many other issues embodied in this travesty of a proposal. Many of them have been submitted to you, so you can read them, research them, find out they are legitimate and legally significant and actionable concerns, and act on them. Deny this siting application.

Staff, you have spent countless hours and months dealing with IPs incompetence in this application--- their failures, obscuration, false-hoods, mistakes, inconsistencies some connived, some legitimate mistakes, and on and on.....at least give the Citizens a break...at least the same breaks IP has been granted along the way, even though they deserve more and better. You actually work for us, your fellow Citizens....and your job is not to help site this atrocity....it is to demand the very highest standards of the applicants. You have an opportunity to help ensure the current and future welfare of the State, it's Citizens, and the land we are blessed to call home. Do your very best to stop this nightmare, and serve us, make us proud and keep Oregon healthy. Recommend to the Council that this application be denied....there are plenty of legitimate and legal and common sense reasons to do so. No question of that. The Council should follow your lead. If they do not, that's on them.

The concerns and issues below stem from the foundational Planning document for Union County, Oregon. The Union County Plan. [Meet Google Drive – One place for all your files](#)



Meet Google Drive – One place for all your files

Google Drive is a free way to keep your files backed up and easy to reach from any phone, tablet, or computer. S...

Pg 6 , #10 "land and water resources be protected". The setbacks proposed in the application for construction or severely inadequate to prevent erosion during large storm events, flooding, and other weather events. The proposed and unnecessary transmission line and it's temporary and permanent roads, tower bases, and cleared swath, will lead to erosional and other pollutants entering precious and clean water ways that are protected due to endangered species inhabitants in the watershed.

Significant Adverse Impacts of protected waterways and wildlife, primarily fish, see Oar 345 022 0060, 345 022 0700, 635 415 025 The applicant's stingy protection setbacks are inadequate and must be increased in size based on local advice relating to topography, soils, and weather events. A bond for mitigation must be in place and sizable.

pg 7, #12 authorized use do no harm to neighbors, nor economy of the County see also #s 14 and 16. This goal and rule in the plan, which of course is a basic tenet of humans everywhere, alone will preclude any siting approval. Of course this self serving, money grubbing, planet grinding---and worst of all, Unnecessary project, WOULD HARM NEIGHBORS. Any questions? The significant adverse Impacts and Harm has been well documented in other comments, but of course include 345 022 0080, and the documented concerns of the local relator association and it's members, as well of course of hundreds if not thousand of home-owners within sight of the proposed travesty (line), many of whom testified tot he Council in person or in writing, are testament to the economic and visual impacts. ors 469.470, 469.501 et al

pg 8 and 9 see 1 through 7 , note esp #6 "the natural beauty of Union County is worth preserving... 345 022 0080 IF this stupid un-needed massive line were gouged across Oregon so Idaho Power's shareholders could make a few dollars...more than \$70 Million profit... of course it should be sited on the BLM vetted, common-sense, Preferred route that would solve most of the many and severe problems encountered in Union County. Make them reapply and select that route for all the obvious reasons. Yes, you can make that happen. Applicable Substantive Criteria 345 022 0030

pg 9 and 19, #S 9 though 15 B2H proposed routes would diminish prime lands available for rural residential, esp in low productive areas. The applicant does not even address this economic impact in their proposal. Necessary for any site approval, plus mitigation. 345 022 0030, oar 660 006

pg 12 second paragraph from bottom ---non-urban industrialrecognition not compatible with urban uses and activities 345 022 0030 Would dramatically and significantly adversely impact La Grande and nearby rural areas. 345 022 0080

top of page 15 'Morgan Lake area seen as potential for farm/residential' 345 022 0030

pg 16 ,,even rural residences'do not interfere with open space....' B2H would interfere with 'open space'. 345 022 0030

pg 20 #6 ...east of Morgan Lake area potential rural residential.. 345 022 0030

pg 25 Landslide concerns.... In Bold in document "**Development may activate stabilized landslide topography**" (like deep blasting and deep digging, road construction, etc???) (In 1979 those local yokels who wrote this Plan sure had an idea what blasting and road construction could do.) 345 022 0020

pg 29, plan change, 'that public need supports the change.' The Public clearly does not support this line. Why would anybody?

pg 31 ag land conversion, see all of #3 A-E, and #4 345 022 0030 applies.

"that the rural character of and farming activities of agricultural uses will be protected to preserve the scenic attractiveness and economic social and physical living conditions desirable to farm families."

pg 32 goal 'to conserve forest land for forest uses"

All of #1 through 10 --- B2H would negatively effect ALL of them, but esp #7 and #10

#4 That before productive forest or range land is converted or classified to include other uses, it will be demonstrated that such areas are more needed by the area economy for those uses.

#7. That sustained timber yield will be encouraged, even by owners of small woodlots.

#10 That non-forest related development in and around timbered areas will not limit timber production, harvest, haul out, slash disposal, road construction, scarification, fertilization, pest or disease control or other timber management operations.

Applicant erroneously minimized impacts and economic damage to forest lands and mistakenly inventoried them ORS 469. 504, oar 660-006

pg 33 Goal "to conserve open space and to protect natural, cultural, historical and scenic resources." 345 022 0080 and 345 022 0030

#2 That the following concerns will be taken into account in protecting area visual attractiveness:

- a. Maintaining vegetative cover wherever practical.
 - b. Using vegetation or other site obscuring methods of screening unsightly uses.
 - c. Minimizing number and size of signs.
 - d. Siting developments to be compatible with surrounding area uses, and to recognize the natural characteristics of the location.
- 345 022 0030, oar 660 006

#6, That development will maintain or enhance attractiveness of the area and not degrade resources. 345 022 0030 Do not approve application for this reason alone.

#7

That sites or structures that have local, regional, statewide, or national historical or cultural significance will be protected to the extent practical (like Oregon Trail...) 345 022 0090

pg 35 Air, Water and Land Resource Goal

1. That planning decisions will recognize immediate and long range effects on the quality of natural resource, and those uses which may likely have an adverse effect on resource quality will be prohibited. IP and fellow scammers want you to swallow the notion that this effectively permanent (yes, and unnecessary) scar across Oregon will not have long range effects. How stupid do they think we are? 345 022 0030, et al

2. That all local, State and Federal agencies will be required to comply with the same air, water, and land resource quality regulations as required of private interests. 345 022 0030

pg 36 Hazard areas

4. That landslide potential will be recognized in any development south or west of La Grande, and that development will be prohibited in areas of known active landslide activity. 345 022 0020, 345 022 0030

pg 37 Economy

3. That suitability of proposed industrial developments will be evaluated according, but not limited to, the following factors: availability of local labor force, materials and market locations, transportation,

service and other community costs, relationship to the environment and present economic base, and similar considerations. 345 022 0030, ors 469.470, 469.501, et al

#5 That industries which might likely have undesirable effects on housing conditions, service costs, school and other public facility capacities and similar consideration will be discouraged. So, Discourage it.

The list goes on. Some of these are certainly actionable in the Courts and are relevant and germane to current EFSC process. These are from our guiding document on Land Use --policies and laws. We can fight on these existing rules and laws and win. But only if you help us do it. Are we going to throw up our hands because a few out of state, wealthy corporations want to 'take' our land, our resources, or quality of life ---all to make a killing? Make no mistake, they do plan on 'taking it...and to use eminent domain to do it. We are fighting. Will you?

Scores of Citizens of this fine County have spent countless hours ---truly countless. More time than you will ever spend on any issue. They have become reluctant experts. They deserve, yet more importantly the entire County and State full of Citizens, now and into the future, deserve, a representative government that actually values them and the local resources, respects their value and concerns, and efforts --- and will at least fight along side of them, not cave in to an out-of-state scammer.

Will you do your job to serve Oregon and Oregonians --- or will we Citizens be obligated by you and Idaho Power, to go to the Courts to seek fairness and justice... to protect our Great State? Step up to the plate, do your job, protect your neighbors. Protect this fine State from these ravages for now and long into the future.

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TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 12:56 PM
To: peter barry; B2H DPOComments * ODOE; TARDAEWETHER Kellen * ODOE;
EFSCcomment@stopb2h.org
Subject: B2H application siting Comment --Do NOT approve siting for B2H --- submit comments for record

From Peter Barry,

To EFSC Staff and Council,

Staff, PLEASE do not recommend to the Council to allow siting in any fashion for the B2h application. This is on you, as they listen to you, and clearly do not have intimate knowledge of this application as do you, and it many issues, inadequacies, deceptions and Lack of Need.

Do not make ANY siting approval for the B2H because :

((Citations and examples of all of these issues are clearly delineated in the submissions by STOPB2H et al.))

1)Idaho Power and partners have fallaciously morphed the reason for 'need.' The for-profit Idaho Power and other two partner applicants, realized they could not 'justify' in any way the 'old need' so they invented a new one. It is based on virtually incomprehensible computer modeling that has been manipulated by them to produce the numbers they seek. The 'new' need is also not justifiable. At the very least, a neutral third party analysis of the computer modeling and all inputs and algorithms should be mandated before any further consideration of this application is made. DENYING THIS APPLICATION WILL HAVE NO SIGNIFCANT IMPACT.

2)The applicants proposal is rife with omissions, mistakes, misinterpretations, erroneous modeling, assertions and projections, and our right fabrications. These are well documented (citations) by others in other submissions.

3) After years of intensive investigation, with millions of dollars spent, the BLM experts, analysts and scientists in many fields, made a clear recommendation of a 'Preferred Route' which had the least impact on all resources. (note that the BLM was NOT tasked with determining 'need.') Idaho Power had said many times they would wait for the Final EIS before announcing their route. But less than 2 months (I believe it was less than two weeks) before the BLM made their announcement, Idaho Power conjured up an all new route right by LaGrande Oregon that had not gone through analysis, and declared it their choice.

When asked by the Council why they had not waited for the BLM Preferred Route IP representative claimed it was because of time constraints. Completely unbelievable. IP is suggesting they did not know what The BLM was doing (which route was being considered as the BLM priority route= Preferred route) even though they were involved and in communication throughout the process.

The Preferred Route would ameliorate a majority of impacts in the Union County segment near La Grande, and the Morgan Lake area almost entirely.

The Mill Canyon and Morgan Lake routes have not been properly studied nor has the public or Council had the data nor time to seriously these last minute additions. Further, they are not 'similar to' the others proposed alternatives, nor close enough to warrant the Applicant the ability to use other data and studies and apply to these terrible alternatives that have severe risks and huge impacts on the community and environment and are much less safe. Since these routes have been chosen by IP as their two routes of choice, they must be required to start the application process anew and propose these routes at the beginning of this new process.

Any siting of the BLM should have the Applicant chose the BLM preferred route as their proposal and not the 'least preferred' routes. It is clear that the way in which the process has been interpreted by the Council, it has become definitively biased against the interests of the Public, landowners, the environment and communities. EFSC should wield the common sense and regulatory power that they do have. Do not tell the Citizens it is 'not in the regulations.' EFSC has any number of potential and real ways to protect the people and the State. Or, are you telling the Citizens you are impotent in the face of any corporate interests? Regulatory Capture is causal in this lack of State agency action.

4) Idaho Power has actually lobbied against laws to encourage or facilitate proven alternative energy sources in the Idaho Legislature and also failed to implement proven energy saving measures in its operation and those of its customers. A failure of a Corporation to adequately serve its customers and the needs of the State are no reason for another State, in this case Oregon, to enable inept and profiteering behavior on the part of a private entity. In fact it is a substantial and 'reasonable' cause not to do so.

5) Energy use and need has been essentially flat and projections regionally and nationally indicate this trend will continue. That IP and its partners can leverage the siting process to game their rate payers out of approx. \$70 million in profit for their private investors, while simultaneously burdening rate payers with the bill for well over a One Billion Dollar plus construction fee, leads any common sense person to question IP and its other monopolistic partners motives in fluffing up their stock portfolios at the expense of consumers who have no choice in suppliers. In addition, not requiring a massive bond which would at least cover the huge costs of decommissioning and clean up of this almost certainly 'stranded-asset'---as in, an astronomical burden on tax payers and rate payers to clean up the damage. We know this happens with all types of mines and other industrial permitted activities. EFSC must require a bond more than sufficient to cover all potential exigencies.

6) While IP claims BPA is still interested in the unneeded B2H line, their most recent budget belies this claim. BPA does not include budgetary consideration for future involvement of the application and construction. EFSC should get guarantees from the BPA or stop all application process until the time full participation and funding (and bonding) is known. It is only normal prudence to not allow continued activity without clear agreements which are fully funded by all participants. We are all aware that the BPA has just recently ended commitments to build a 'necessary' transmission line and their state reasons are telling.

7) Death Spiral of conventional generation and distribution systems are well researched and documented and EFSC should not site the B2H without completed research relating to this phenomenon vis a vis the B2H application and near and long term energy economics. Basic realities should be of primary concern---not filling boxes on an application process. If you were a prudent investor would you sink more than a billion dollars in such a poorly documented and spurious scheme? I hope not.

8) IP must adequately prove to a very high standard that upgrading existing transmission capacity is not as useful and economically and environmentally beneficial to the State of Oregon, its Citizens and to the most probable and 'common sense' future of rate payers and the environment. It has not yet satisfactorily made this case. IP's basic argument distilled down to its foundation is : "we don't want to." Any reasonable person wonders if their profit motive vis a vis the B2H application and construction is driving their decision making process. As a 'for-profit monopoly' with the CEO and others holding stock they want to profit from, this is undeniably the case. It is in fact germane to have the documents and all communications between Pacific Corp and Idaho Power to know what plans Warren Buffet et al have communicated in buying out IP, or other schemes. The Public and the Oregonians who would suffer under this application have a right to know.

9) Climate Crisis should be the single over-riding criterion for the Council to consider any application. While some suggest the B2H might be useful for moving 'alternative energy' research indicates that energy users and rate payers benefit the most from local generation and distribution with the immense added benefit of not being subject to massive and cascading grid failures which are predicted to get worse. Large scale transmission grids are subject to large scale failures ---which are only becoming more severe with enemy hacking and ransom actions and demands by bad-actors. We have a grid that could be bolstered and protected. Siting 'old-school' technology of additional large scale transmission capacity only detracts from and slows the efforts for local and regional resiliency. Rather, using state of the art conservation and alternative energy sources is clearly the current best practice with immense benefits in every category.

10) Allowing any motion forward on this application should be done only if there is iron-clad proof of its unquestionable necessity. One additional reason, if you might for some reason need one, is that a huge amount of the line/route proposed by IP crosses a almost 200 miles of private property parcels (almost double that of Public Land). Most of these owners do not want the line on or even near their property. How many land owners---or Citizens of this State have written you and promoted this project? IP would use Eminent Domain to 'take' the owners land. Compensation is miserably paltry, so 'taking' is an accurate descriptor. The effects are long lasting-- perhaps for 50 or more years. As a Public agency designed to serve the Public....you must take this reality into consideration. We are a Nation and a State that honors and defends private property rights. Imagine this fabricated project being bulldozed through your homeland. Your role is protect the right of owners unless insurmountable needs are proven beyond any doubt. Clearly there are hundreds of unanswered questions and issues with this application-- to take others peoples land to give more profit to an out-of-state corporation.

11) The Public Lands that would be severely damaged and altered are also owned and held for all Americans, now and all future generations in perpetuity. These are not 'Federal or State lands', these are the Peoples' lands. The many impacts are massive, multi-dimensional, well documented, and very long lasting. EFSC should not approve any siting of this spurious project with so many questions concerning basic facts in the application, omissions, and out right fabrications in the application. The effects are certain, the claimed 'benefits' are spurious and flimsy.

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TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:10 PM
To: EFSCcomment@stopb2h.org; TARDAEWETHER Kellen * ODOE; B2H DPOComments * ODOE; peter barry
Subject: Idaho Power application B2H Official Comments Plz include in the Record-- EFSC Comments

To EFSC Staff and Councilors,

EFSC staff should recommend to the Council to NOT ALLOW SITING of B2H transmission line. Application should be denied based on the following, and including all the other objections also filed by others. (Because average Citizens have limited time and expertise to research and respond to such a complex and convoluted application and process---a 'reasonable person' can plausibly project that there are many other inadequacies, errors and failures in the application that the working Citizens just have not had the time to yet uncover. These and others objections submitted are only a small representation of the failures of this damaging and un-needed project.)

In the Union County Planning Document:

Agriculture:

"4. That the rural character and farming activities of agricultural 'uses will be protected to preserve the scenic attractiveness and economic, social and physical living conditions desirable to farm families."

Where as the B2H proposed routes would cross many privately owned and operated agricultural parcels, and would definitely negatively impact one, some or all of the rules, values and stipulations in the County Plan described in #4, on some or all of the parcels, and no appropriate nor reasonable mitigation has been proposed to protect the values protected within this Plan.

For the scenery aspect, Specifically, OAR 345-022-0080, in describing Scenic Resources, states "the Council must find that the design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic resources and values identified as significant or important in local land use plans...." Has the applicant consulted with land owners concerning scenic impacts. Have they consulted with County officials on mitigation? There would be 'negative impacts, with out any doubt. The applicant has not proposed any mitigation solutions to address these negative impacts that are protected against in the County Planning document.

The applicant has not adequately or substantively addressed "social and physical living conditions to farm families" in its application. These aspects are inarguably fundamental to all Humans worldwide and are the basis for 'quality of life.' Nowhere in the application are the highly important social living conditions protected in the Union County Plan addressed in any meaningful way. Clearly research

into these negative impacts are needed prior to any approval for as site certificate. Anybody who has owned a home or land, especially agricultural land, can attest to the fundamental importance of 'the Home Ground', especially the connection and value of 'the families land' that has often been passed down through generations. These agricultural land are the core and center of families and therefore whole communities. Where in the application are these values (which are elucidated and protected in the County Planning document cited above), discussed and mitigated, as if that were even possible.

These attributes and concerns for the enshrined 'protection,' in this foundational County Planning document, also apply to "physical conditions desirable to farm families." No where in the application are the realities of the proposed massive intrusion into agricultural lands owned by families that would be negatively impacted adequately addressed. How many farmers have come forward in this process to approve of having their land invaded by a massive clearing, the effects of roads on soils and crops, herbicide use beyond their own control, 130' to 180' towers, massive loud wires/cables that cause noise pollution, visual blight and are a greatly increased risk for equipment use and wildfire?

Having a massive 'swath' bulldozed across many families' own home-ground, and having the unwanted intrusion/invasion of a Corporation planning to make money off of the certain degradation of a persons family property, is truly negatively significant. The impact is not transitory nor minor, but the exact opposite. A daily reminder of ones 'failure' to protect ones own family land from this wanted invasion is counter to the stated protections and in no way be considered 'desirable' as stated below: "That the rural character and farming activities of agricultural 'uses will be protected to preserve the scenic attractiveness and economic, social and physical living conditions desirable to farm families."

These protections and the obvious significant impacts are not addressed nor mitigated and no justification of any exception is warranted. The applicant does not comply with Applicable Substantive Criteria in the Land Use Standards in 345 022 0030 nor the Statutory Authority mandated in ORS 469.470 or 469.501 or any others. The application must be denied.

The applicant does not address the County law, nor mitigates the severe and obvious significant adverse impacts that protects these individuals rights clearly stated in the Planning Document.

These are just some of the many risks and negative impacts that do not comport with the "physical conditions desirable to farm families." Agricultural work is already extremely difficult and demanding work, and the negative effects of the applicants proposal on basic irrigation practices (pivots movement, handlines safety risk, etc), on the movement and control of livestock with changes in fencing and gates required, loss of shade trees for livestock in any ROW (right of way) clearing, weed issues caused by soil disturbance (weeds growing on the ROW) would cause airborne seed dispersal, and seeds would be are transported by IP equipment. Inadequate plans by the applicant and lack of any substantive mitigation for significant adverse impacts to of economic loss, much less any attempt at an accurate estimate in the application of true economic loss to farmers, ranchers, timber owners, does not comply with 345 022 000 or any other law concerning accounting or mitigation of economic impacts protected under the County Planning document.

Perhaps most significant and not addressed in the application adequately and without appropriate mitigation is the 'taking' (aka 'purchasing') easements, especially unwilling sellers--through Eminent

Domain. That Humans have always been closely tied to the land, and to certain parts of the land, to the point that these lands become 'sacred' is without dispute. Nowhere in the application are the County 'protections' of this and other 'condition desirable to farm families' addressed adequately or somehow mitigated.

The Application should therefore be denied.

It is 'reasonable' to conclude that these protected and valued attributes ascribed in #4 apply to 'rural and farming' character and activities--- are also valued by the many small rural/agriculturally based communities adjacent to or nearby to these areas proposed to be effected by the applicant in this stupid proposal. Choosing the most narrow and limiting interpretation of Protections and intent in Plans and such, does not serve the populace nor the State. Just as choosing the most generous interpretation for applicants and assuming that mitigation will be preformed as assumed or described at some later date is also unreasonable, inappropriate and does not adequately serve the populace, the process as intended nor any fair or reasonable form of due diligence. Is EFSC a robot? A robot remotely controlled by Idaho Power? The "intent' of the rules, laws and practices should be the applied standard. The actual and reasonably realistic negative impacts should be the core of evaluation and decision making.

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Just this one aspect of the law in the Union County Plan document is reason enough to deny this application for siting. Of course there innumerable other germane and significant reasons to deny this application which have been presented to you.

Do the right thing, Deny this Siting Application.

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TARDAEWETHER Kellen * ODOE

From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 1:01 PM
To: EFSCcomment@stopb2h.org; TARDAEWETHER Kellen * ODOE; peter barry
Subject: Siting application for B2H comments, include in the Record --- Please include in official comments for EFSC consideration

To the Staff and Commissioners of EFSC,

Do not read this unless you think you are open minded to some genuine, self reflection and evaluation of this important process. If you are as you appear -- self-certain, and so sure you are much more intelligent than the rest of Oregonians, than why waste your time on comments by an inferior. Though it should be easy and somewhat satisfying for you to flick aside any and all of my perceived issues.

Everything we each do, our choices, behavior, our actions, reflects our ethics. What are yours? This is a germane and fair question as huge impacts are effected by them.

Do you see your role simply as a Rubber Stamp bureaucrat? (I'm sure not. That would be simplistic and not reflect all that you know and do.) Yet, this is the sad and demeaning history of EFSC --- of your 'decision making.' Rubber Stamping. It is not really decision making ---- the decisions are made by the corporations that exploit (did I mean to say 'serve') the people and resources of the State, and exploit the natural capital and virtues of all future Citizens--- all for a profit. And you merely 'legitimize' these corrupt practices. (Are you apprised of and actively countering Regulatory Capture by the applicants in your role?) Have you EVER refused to site anything? Or, sited a project only after huge alterations that were asked for by Citizens or groups, or those effected? Please correct me with a few examples. Easy, right?

Wait! Are you going to quit reading already? Because.....? you do not like hearing the truth? Or maybe I am wrong.... just give it couple more paragraphs....a few minutes. (You want to read about Hanley's tarnished past, right?)

The recent Oregon State Supreme Court ruling clearly slapped you and your corrupt practices back a bit. We peasants were so pleased that you made rule changes to 'promote public access and transparency'! Well, you are right---you are smarter than all of us, because we are so easily duped. We believed you, and took you at your word! You actually did the opposite of what you said. Apparently the Citizens of this fine State must rely solely on the Court's justice after you meekly and predictably approve yet another terribly conceived and proposed plan for corporate profit. It serves the State? The Citizens? Are you unconscious?

Now 'Councilor' Hanley Jenkins was unfortunately the County Planner for Union County for some years. He did nothing during his tenure to protect the County from onslaughts such as the B2H --and we can all only predict that he will vote to Rubber Stamp this profit-grabbing, un-needed project that will harm his very own neighbors and fellow Citizens. (oh, right...ex-neighbors, he moved.) Why is this so certain? Because he was instrumental in tearing down a purpose-built structure in La Grande that was only 15 years old. Who would do that? And why? Because he and the other good ol boys in the County could not see past their own first 'plan' and their own short-sightedness----and in spite

of huge protests and multiple alternatives, chose to site the new courthouse, right where the protective center for the most abused citizens among us, were assisted in their most profound time of need. Right Hanley? Tear down an almost new Abused Womens and Children's Center, that was perfectly located next to the Police Station. The good people of Union County know they will not find a 'defender' in this man with so little heart or imagination.no, no hope can be expected from this much-detested and reviled mr jenkins. He owns what he wrought...as do you.

Now the rest of you --- not so well known on this side of the State ---- of the eastern part of the East/West divide.... but we got a glimpse into your hearts when you came to the meetings in our towns. Truly disgusting behavior on your part---shame on you. To pretend to hold 'listening' hearings. (" it is required " ---the 'dog and pony show,' ...for some silly reason it is in the damn regulations.) I am certain you did in no way fulfill the important and legal duty to promote Public input.

Worried Citizens, some scared, some angry, some well researched, came to be heard. People almost always said " Thank you for coming to listen to us tonight." But it was absolutely clear that you were not listening, and were not hearing, and clearly did not care. All people are aware when they are, and when we are not being listened to. In those few hours each of those nights, you tore down our Democracy bit by bit. I watched you all carefully. Watched while you tapped away on your laptops, or wrote something or the other on paper...clearly having nothing to do with the people in front of you. I and others were enraged and disgusted. You all should have been tarred and feathered, at the least. Would that not be justice for your disrespect of your fellow Citizens? You are lucky that these good folks are indeed respectful....unlike yourselves.

What exactly are you doing on this Council? Do you have any understanding of the projects or actually care about the costs and impacts on our State--- our environment , our people? I would like to quiz you about some obvious facts about the B2H and see how many you can answer. Are you willing? So why are you on this Council? Certainly not 'service to the Citizens of the State! Service to the corporate interests? You say, 'no'. What then? How are you serving us now? The future?

You will not read the hundreds of legitimate, well cited, arguments presented to you. We can be certain of this. We suppose you must instruct the staff to do their best to come up with at least some reason each and every argument, concern, and point are without any merit, and once again ink-up your well used rubber stamp. You all are so sadly without ethics, and so predictable.

It may seem harsh...but this seems somehow appropriate. I want to promise each of you will I will post in the ubiquitous and never dying digital sphere, your 'decisions.' That you abrogated your sacred trust. You squandered your little bit of power to serve the monied interests over the People and the Planet and the future. I will do it to provide a small--- a very very small, bit of Justice. And therefore your children, family and acquaintances will know the truth about you, and so maybe they will strive to do right... to right your huge and inexcusable wrongs.

Peter Barry
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TARDAEWETHER Kellen * ODOE

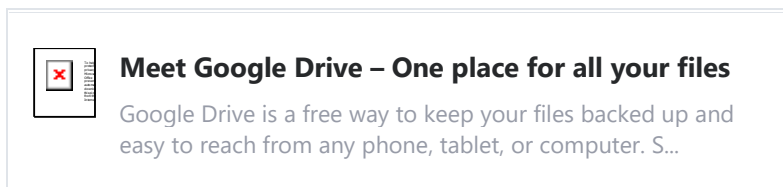
From: peter barry <petebarry99@yahoo.com>
Sent: Thursday, August 22, 2019 3:11 PM
To: TARDAEWETHER Kellen * ODOE; efsccomment@stopb2h.org; peter barry; B2H
DPOComments * ODOE
Subject: B2H comments for the Record-- Application by Idaho Power/b2h/ DENY

To EFSC Staff and Council,

Do NOT approve any siting of Idaho Power application for the reasons below, and the many, many other issues embodied in this travesty of a proposal. Many of them have been submitted to you, so you can read them, research them, find out they are legitimate and legally significant and actionable concerns, and act on them. Deny this siting application.

Staff, you have spent countless hours and months dealing with IPs incompetence in this application--- their failures, obscuration, false-hoods, mistakes, inconsistencies some connived, some legitimate mistakes, and on and on.....at least give the Citizens a break...at least the same breaks IP has been granted along the way, even though they deserve more and better. You actually work for us, your fellow Citizens....and your job is not to help site this atrocity....it is to demand the very highest standards of the applicants. You have an opportunity to help ensure the current and future welfare of the State, it's Citizens, and the land we are blessed to call home. Do your very best to stop this nightmare, and serve us, make us proud and keep Oregon healthy. Recommend to the Council that this application be denied....there are plenty of legitimate and legal and common sense reasons to do so. No question of that. The Council should follow your lead. If they do not, that's on them.

The concerns and issues below stem from the foundational Planning document for Union County, Oregon. The Union County Plan. [Meet Google Drive – One place for all your files](#)



Pg 6 , #10 "land and water resources be protected". The setbacks proposed in the application for construction or severely inadequate to prevent erosion during large storm events, flooding, and other weather events. The proposed and unnecessary transmission line and it's temporary and permanent roads, tower bases, and cleared swath, will lead to erosional and other pollutants entering precious and clean water ways that are protected due to endangered species inhabitants in the watershed.

Significant Adverse Impacts of protected waterways and wildlife, primarily fish, see Oar 345 022 0060, 345 022 0700, 635 415 025 The applicant's stingy protection setbacks are inadequate and must be increased in size based on local advice relating to topography, soils, and weather events. A bond for mitigation must be in place and sizable.

pg 7, #12 authorized use do no harm to neighbors, nor economy of the County see also #s 14 and 16. This goal and rule in the plan, which of course is a basic tenet of humans everywhere, alone will preclude any siting approval. Of course this self serving, money grubbing, planet grinding---and worst of all, Unnecessary project, WOULD HARM NEIGHBORS. Any questions? The significant adverse Impacts and Harm has been well documented in other comments, but of course include 345 022 0080, and the documented concerns of the local relator association and it's members, as well of course of hundreds if not thousand of home-owners within sight of the proposed travesty (line), many of whom testified tot he Council in person or in writing, are testament to the economic and visual impacts. ors 469.470, 469.501 et al

pg 8 and 9 see 1 through 7 , note esp #6 "the natural beauty of Union County is worth preserving... 345 022 0080 IF this stupid un-needed massive line were gouged across Oregon so Idaho Power's shareholders could make a few dollars...more than \$70 Million profit... of course it should be sited on the BLM vetted, common-sense, Preferred route that would solve most of the many and severe problems encountered in Union County. Make them reapply and select that route for all the obvious reasons. Yes, you can make that happen. Applicable Substantive Criteria 345 022 0030

pg 9 and 19, #S 9 though 15 B2H proposed routes would diminish prime lands available for rural residential, esp in low productive areas. The applicant does not even address this economic impact in their proposal. Necessary for any site approval, plus mitigation. 345 022 0030, oar 660 006

pg 12 second paragraph from bottom ---non-urban industrialrecognition not compatible with urban uses and activities 345 022 0030 Would dramatically and significantly adversely impact La Grande and nearby rural areas. 345 022 0080

top of page 15 'Morgan Lake area seen as potential for farm/residential' 345 022 0030

pg 16 ,,even rural residences'do not interfere with open space....' B2H would interfere with 'open space'. 345 022 0030

pg 20 #6 ...east of Morgan Lake area potential rural residential.. 345 022 0030

pg 25 Landslide concerns.... In Bold in document **"Development may activate stabilized landslide topography"** (like deep blasting and deep digging, road construction, etc???) (In 1979 those local yokels who wrote this Plan sure had an idea what blasting and road construction could do.) 345 022 0020

pg 29, plan change, 'that public need supports the change.' The Public clearly does not support this line. Why would anybody?

pg 31 ag land conversion, see all of #3 A-E, and #4 345 022 0030 applies.

"that the rural character of and farming activities of agricultural uses will be protected to preserve the scenic attractiveness and economic social and physical living conditions desirable to farm families."

pg 32 goal 'to conserve forest land for forest uses"

All of #1 through 10 --- B2H would negatively effect ALL of them, but esp #7 and #10

#4 That before productive forest or range land is converted or classified to include other uses, it will be demonstrated that such areas are more needed by the area economy for those uses.

#7. That sustained timber yield will be encouraged, even by owners of small woodlots.

#10 That non-forest related development in and around timbered areas will not limit timber production, harvest, haul out, slash disposal, road construction, scarification, fertilization, pest or disease control or other timber management operations.

Applicant erroneously minimized impacts and economic damage to forest lands and mistakenly inventoried them ORS 469. 504, oar 660-006

pg 33 Goal "to conserve open space and to protect natural, cultural, historical and scenic resources." 345 022 0080 and 345 022 0030

#2 That the following concerns will be taken into account in protecting area visual attractiveness:

- a. Maintaining vegetative cover wherever practical.
 - b. Using vegetation or other site obscuring methods of screening unsightly uses.
 - c. Minimizing number and size of signs.
 - d. Siting developments to be compatible with surrounding area uses, and to recognize the natural characteristics of the location.
- 345 022 0030, oar 660 006

#6, That development will maintain or enhance attractiveness of the area and not degrade resources. 345 022 0030 Do not approve application for this reason alone.

#7

That sites or structures that have local, regional, statewide, or national historical or cultural significance will be protected to the extent practical (like Oregon Trail...) 345 022 0090

pg 35 Air, Water and Land Resource Goal

1. That planning decisions will recognize immediate and long range effects on the quality of natural resource, and those uses which may likely have an adverse effect on resource quality will be prohibited. IP and fellow scammers want you to swallow the notion that this effectively permanent (yes, and unnecessary) scar across Oregon will not have long range effects. How stupid do they think we are? 345 022 0030, et al

2. That all local, State and Federal agencies will be required to comply with the same air, water, and land resource quality regulations as required of private interests. 345 022 0030

pg 36 Hazard areas

4. That landslide potential will be recognized in any development south or west of La Grande, and that development will be prohibited in areas of known active landslide activity. 345 022 0020, 345 022 0030

pg 37 Economy

3. That suitability of proposed industrial developments will be evaluated according, but not limited to, the following factors: availability of local labor force, materials and market locations, transportation,

service and other community costs, relationship to the environment and present economic base, and similar considerations. 345 022 0030, ors 469.470, 469.501, et al

#5 That industries which might likely have undesirable effects on housing conditions, service costs, school and other public facility capacities and similar consideration will be discouraged. So, Discourage it.

The list goes on. Some of these are certainly actionable in the Courts and are relevant and germane to current EFSC process. These are from our guiding document on Land Use --policies and laws. We can fight on these existing rules and laws and win. But only if you help us do it. Are we going to throw up our hands because a few out of state, wealthy corporations want to 'take' our land, our resources, or quality of life ---all to make a killing? Make no mistake, they do plan on 'taking it...and to use eminent domain to do it. We are fighting. Will you?

Scores of Citizens of this fine County have spent countless hours ---truly countless. More time than you will ever spend on any issue. They have become reluctant experts. They deserve, yet more importantly the entire County and State full of Citizens, now and into the future, deserve, a representative government that actually values them and the local resources, respects their value and concerns, and efforts --- and will at least fight along side of them, not cave in to an out-of-state scammer.

Will you do your job to serve Oregon and Oregonians --- or will we Citizens be obligated by you and Idaho Power, to go to the Courts to seek fairness and justice... to protect our Great State? Step up to the plate, do your job, protect your neighbors. Protect this fine State from these ravages for now and long into the future.

Peter Barry
60688 Morgan Lake Road
La Grande, Oregon 97850

petebarry99@yahoo.com

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

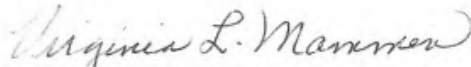
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

Exhibit 1

City of La Grande Ordinance Number 3242,
 Series 2018
 Page 236 of 312

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

²The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³These right-of-way width ranges are for new streets.

⁴Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

Exhibit 2

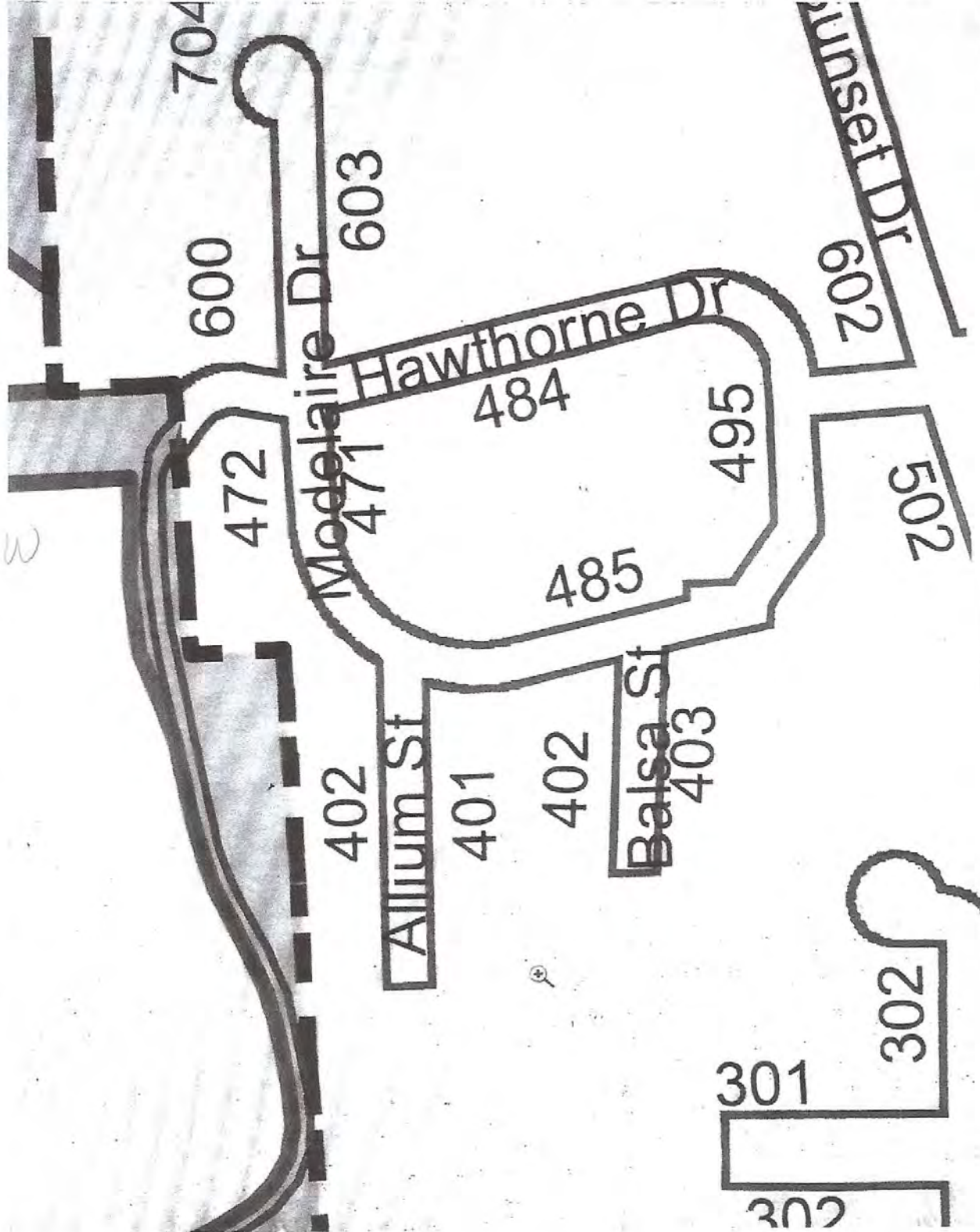


Exhibit 3

Public Services

ORAR 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

ORAR 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

ORAR 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" (ORAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (ORAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

ORAR 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

ORAR 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.



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

Exhibit 6

7/25/2019

Gmail - Modelaire Roadway Specifications



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



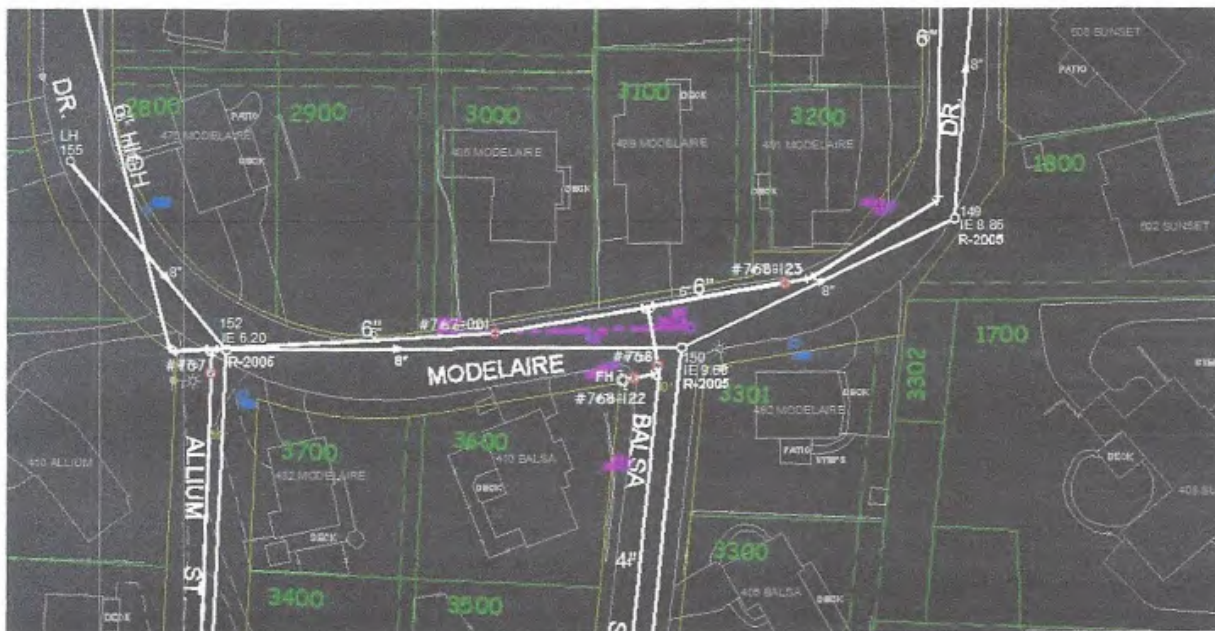
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

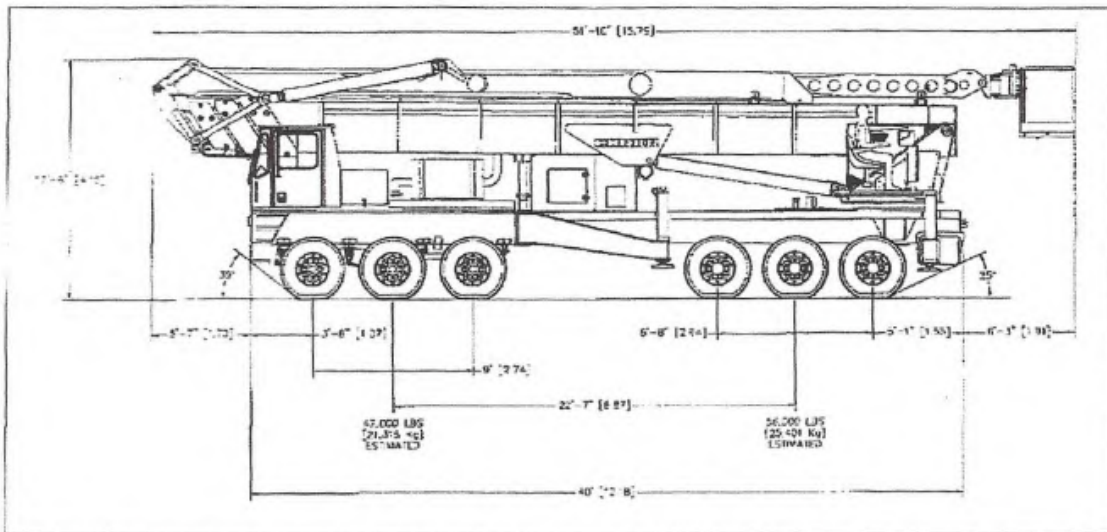


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

City of La Grande Ordinance Number 3242,
Series 2018
Page 252 of 312

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Exhibit 12

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

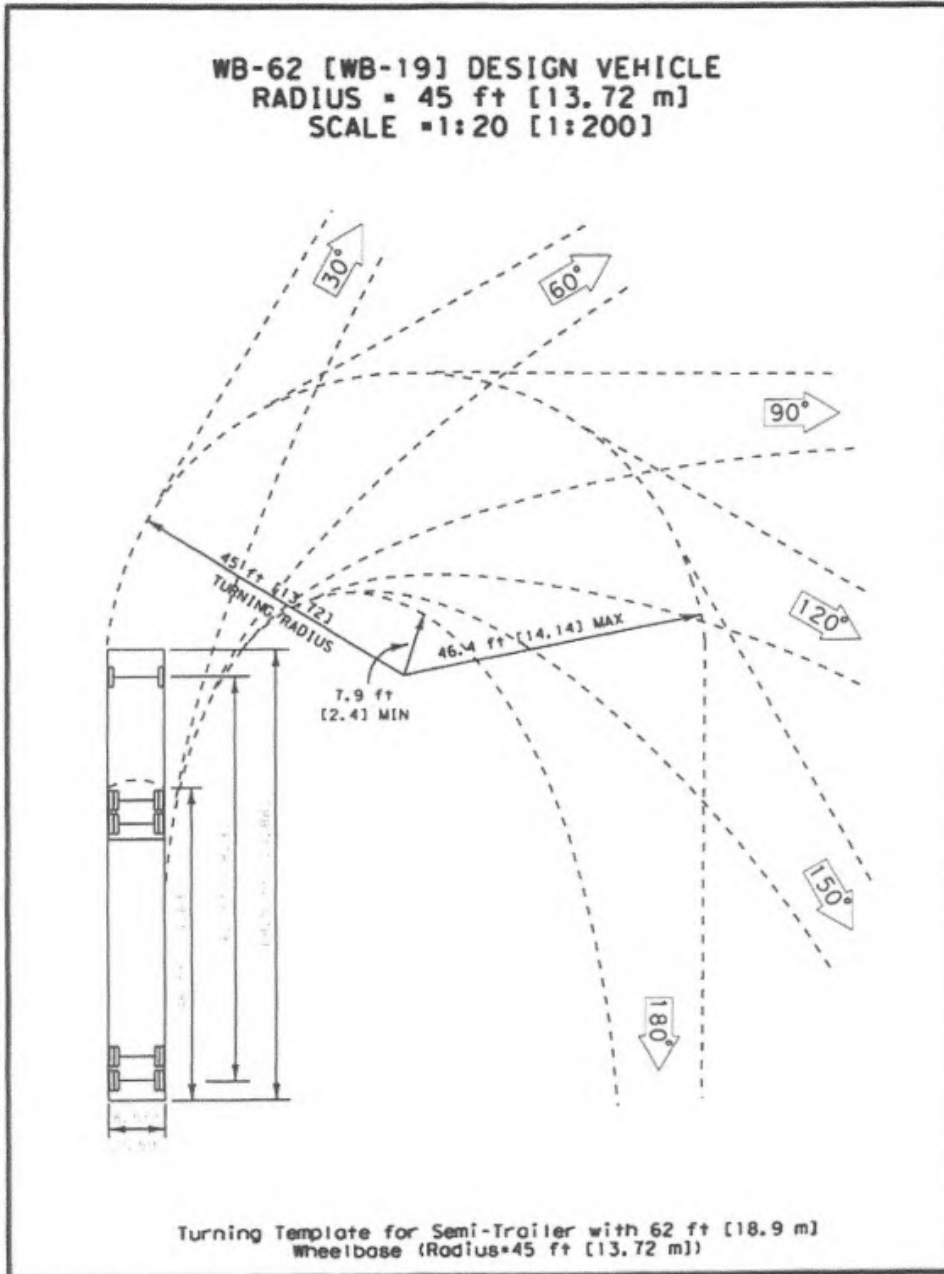


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

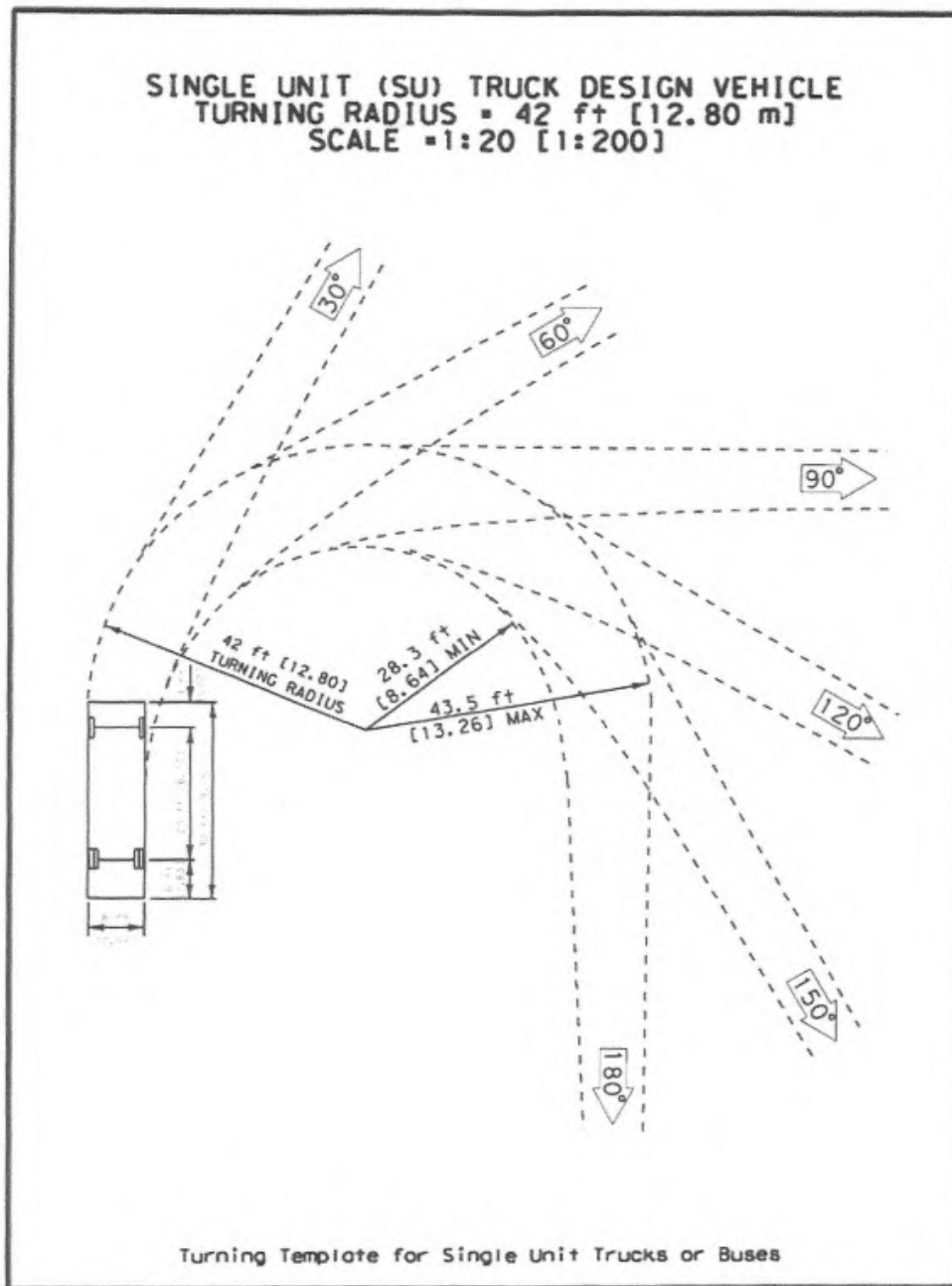


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

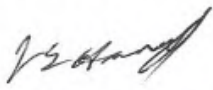
Section 17. TRUCK ROUTES

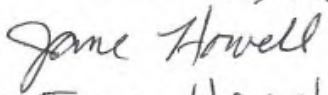
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

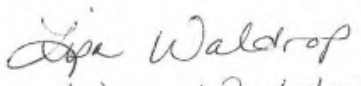
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

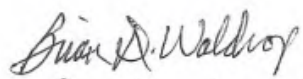
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

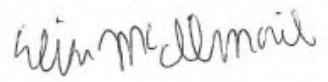
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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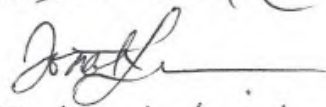

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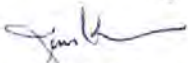
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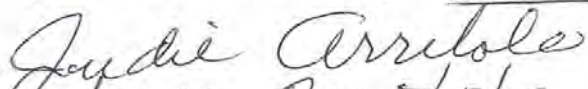
EMAIL

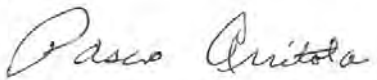
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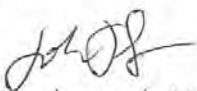
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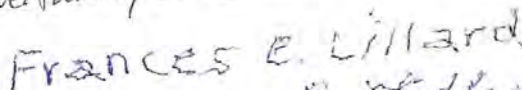
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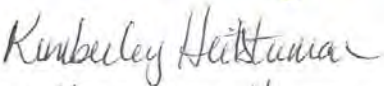
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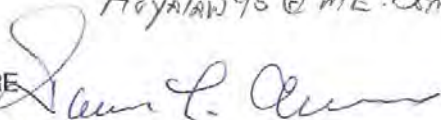
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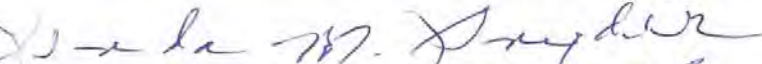
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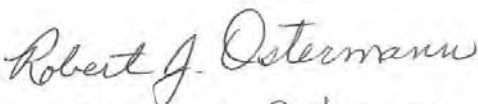
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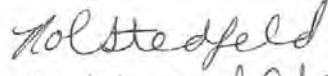
SIGNATURE 
PRINTED NAME Linda Snyder
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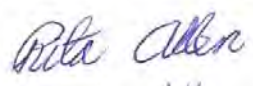
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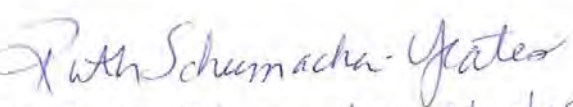
SIGNATURE 
PRINTED NAME Robin J. Ostermann
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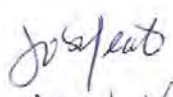
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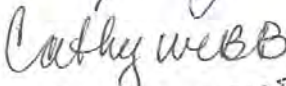
SIGNATURE 
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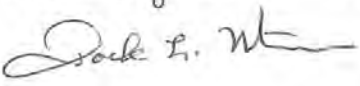
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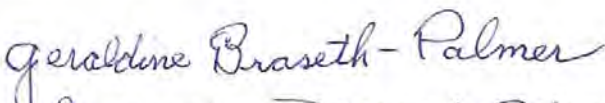

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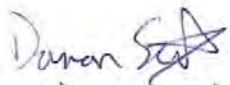
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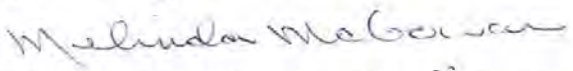
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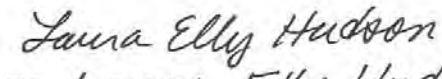
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SIGNATURE *Gary D. Pierson*
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ADDRESS
EMAIL

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Merle E. Comfort*
PRINTED NAME MERLE E. COMFORT
ADDRESS 2009 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*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Belketer Ln - LaGrande, 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 4th St. LaGrande PR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

ESTERSON Sarah * ODOE

From: Ellen Barton <elbarton3@frontier.com>
Sent: Wednesday, August 21, 2019 5:54 PM
To: B2H DPOComments * ODOE
Subject: B2H Comment Letter: Personal concerns regarding this project

August 21, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I have personal concerns regarding the proposed Boardman to Hemingway Transmission Project. I live on Walnut Street at the south end of La Grande just as the road enters the canyon to Morgan Lake and other forest residential and recreational areas. I have lived here for over 30 years. During that time, I have noted that the hillside across the street from my home has displayed instability in that small slumps and slides have occurred. It is known to the community that a fault line traverses this area, causing movement in homes and buildings such as the Grande Ronde Hospital on Sunset Drive. Should there be construction including blasting in the area, I am concerned that this will exacerbate earth movement and stability of the slopes above this area of town.

After the Oso, Washington slide, I accessed a geology site that showed historic landslides in this area. The possibility of a landslide in this area of our community was a distinct possibility, especially if triggered by events such as earthquakes or blasting.

I also have personal concerns of the traffic entailed in the construction of this transmission line project. The Morgan Lake Road carries a significant amount of traffic, both from people accessing the recreational opportunities of Morgan Lake and other activities such as cross country skiing, snowmobiling, etc., and those people traveling to and from their residences in this area. Should this project be approved, the increased traffic by large equipment would be more hazardous than it already is.

Finally, I have no desire to view several large towers crossing my view of the mountains and valley where I live. The information available indicates that this transmission line is not only unnecessary but will be obsolete when it is completed. Residents of the Grande Ronde Valley and other communities in Oregon will have no benefit from the line and will only have the eyesore of towers and hazards of fire, slope instability, traffic hazards during construction.

I urge the Energy Facilities Siting Council to deny this project.

Sincerely,

Ellen Barton

91 Walnut

La Grande, OR 97850

E-Mail: elbarton3@frontier.com

TARDAEWETHER Kellen * ODOE

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Friday, July 12, 2019 2:55 PM
To: TARDAEWETHER Kellen * ODOE; odoe@service.govdelivery.com
Cc: David Yeakley; comment@boardmantohemingway.com; bharvey@bakercounty.org; Greg Smith; Greg Smith; Senator_Merkley@Merkley.senate.gov; senator_wyden@wyden.senate.gov; SEN Bentz; REP Findley; mbennett@bakercounty.org
Subject: [Fortimail Spam Detected] FW: In opposition to B2H Idaho Power proposed route through Baker County

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy

Dear Sir/Madam:

Re: Public Comment Deadline Extension and Transcripts Available on Proposed Boardman to Hemingway Transmission Line

Comment for the Record:

It is time that Public Utilities become more interested in safety of Human lives, private and commercial property and our natural resource Timber (Forests) and rural community economic resources in light of the horrific death toll caused by Forest Fires resulting from Utility Company faulty Power Lines and Equipment such as Pacific Gas & Electric Company infrastructure that caused the deadly "Camp Fire" in Northern California town of Paradise and outlying communities.... Please view my herein correspondence with a Utility Company who is familiar with HVDC Power Transmission of energy with much Less loss of energy along the transmission route and safer for people, animals; domestic and wildlife, property and our Valuable Timber resource, our Forests. This newest technology is being used all around the world today with success and offers the most safest method of transmission of power energy with less Loss of energy, Waste of Energy along the transmission line.

There are better alternatives today, both in underground and/or HVDC Power Transmission lines than current HVAC, with no hazardous EMF danger. Power Energy Corporations and government oversight agencies must take into account the latest 21st century technology available today to protect Human Lives, Commercial and Private Property and protect our valuable Timber, our Forests, against such Preventable tragedies....not to mention citizens health related problems caused by all the smoke from these fires over the obstinate Big Energy Corporation's only concern for their bottom line utilizing the most least expensive routes and installation methods available today with no concern or regards for the public health & rural Oregon Communities. The savings of loss of energy along these long routes is not considered in costs as these costs are passed on to the consumer...less loss of energy/wasted energy is a huge savings to the consumer and if absorbed by the Power Energy Corporations they would be encouraged to find better alternatives. Lives are more valuable than dollars.

Human lives, private property, rural communities and our valuable forest timber resources must be first priority...cheapest is not always cheapest when seeing the devastation and the Cost Burden now facing Pacific Gas & Electric Company of California, not to mention all the personal suffering of victims.... Oregon is not

exempt from such disasters and is a ticking time bomb that all will be responsible for by ignoring the potential of other such fires in rural Oregon. There have been several California forest fires triggered by Pacific Gas and Electric Company's Power Energy Transmission lines and failed infrastructure and these are not limited to California.

Thank you for your time and consideration.

Respectfully,
Donald R. Beck
Baker City, OR 97814

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

Baker City, OR 97814

- "Truly my soul silently waits for God; From Him comes my salvation. He only is my rock and my salvation; He is my defense; I shall not be greatly moved" Psalm 62:1-2

From: dyeakley@charter.net [mailto:dyeakley@charter.net]

Sent: Friday, July 12, 2019 1:14 PM

To: 'donbeck@donbeckbronzes.com' <donbeck@donbeckbronzes.com>

Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Have you sent this to the Energy Facility Siting Council? Input is due by July 23, and you could forward this information to:

B2H.DPOComments@Oregon.gov

I took the council standards, and went through them to show why the line should not be built.

Take care.

From: "Don Beck"

To: bharvey@bakercounty.org

Cc: "David Yeakley", "Cliff Bentz", "Congressman Greg Walden", "Greg Smith", "Greg Smith"

Sent: Monday February 4 2019 4:23:16PM

Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Dear Commission Bill Harvey:

Greetings and Happy New Year! For the record and for your information as well as those working on the opposition of the BH2 Idaho Power transmission line I would like to forward to you the information that I received to my inquiry as to the best solution for installation and long term feasibility & safety of HVDC power verses HVAC power the current method of transportation. HVDC would not present the EMF human safety

affects nor the potential of forest fires, like what transpired by the Californian P.G.&E. Co of California which is now in bankruptcy due to "CAMP FIRE" where complete towns, communities of nearly 3000 commercial buildings/businesses and 14,000 residential homes were destroyed and took **88 lives** <https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> This is a very Important aspect of the problem with HVAC overhead power lines. Communities and Lives are put at risk and we cannot afford to ignore this potential in Baker County just to allow Idaho Power to dictate their most economically based installation methods, which does not take into consideration the Power Loss along the entire distance of the Transportation of Power. It is not a matter of if, but when! As you investigate P.G.& E.'s account or record this was not the first nor only accounts of their facilities causing loss of life, forests and property, just the straw that broke the camel's back. They have been proven to lie when investigations that occurred in support of their faulty facilities on numerous occasions. Money should not dictate objectives over the Lives and Communities, Towns and Forests.

With the newest and latest advancement technology age that we now live in there are better, safer and more efficient ways of doing business and the Big Electric Corporation should respect the lives and communities that they want to just mow through thinking of and only putting the dollar first and now, before lives and loss revenue due to Power Loss along these lines annually.

After considering my questions in the correspondence below and the contact I was given for further answers of my questions perhaps you could forward this information to whomever is in the position for the County to represent the opposition to B2H Idaho Power proposed route through Baker County to Boardman, OR so that they can be equipped with questions that need answers and follow through with the best method for our community in best interest of Baker County citizen's lives, property owners, including safety from EMF affects then present findings to Idaho Power.

Thank you Bill, and all the best to you. We greatly appreciate your leadership.

Best regards,
Donald Beck
Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>
email: <mailto:donbeck@donbeckbronzes.com>
tel: 541 524 1633
add: P.O. Box 713, Baker City, OR 97814

~ "And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD" Psalms 40:3

From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 3:02 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
I'd say 400 + miles as the threshold of cost/benefit for HVDC

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Monday, February 04, 2019 4:10 PM

To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: RE: HVAC vs. HVDC

EXTERNAL

Thank you Tony: One last question what is considered long distance? We are talking about 400 miles here.

Thanks,
Donald Beck

[Don Beck Bronzes](#)

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]

Sent: Monday, February 4, 2019 1:23 PM

To: donbeck@donbeckbronzes.com

Subject: RE: HVAC vs. HVDC

Donald,

ISO is an independent system operator, and as Oregon does not have its own, the California ISO is the closest one and would be more geographically relevant than our Midwest system operator.

Due to the complexity of HVDC systems, I'd not expect HVDC to be the future of HV overhead lines...my perspective is HVDC overhead makes sense for long distances with a dedicated purpose. Outside of the United States, HVDC (non-classic technology) is being utilized for under water and other unique applications...EPRI would be a great resource here!

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Monday, February 04, 2019 3:07 PM

To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>

Subject: RE: HVAC vs. HVDC

EXTERNAL

Hi Tony:

I understand fully, the internet is a great too, but with it comes all the need for protection filters.

I wanted to question your suggesting contacting California ISO, not knowing what this stands for my question is do you think they would cover the state of Oregon, or mistype? If, so would you have a contact for state of Oregon?

From your own perspective is HVDC the future of HV overhead lines? Any pros and cons that you can share?

Thank you again Tony.

I appreciate your getting back with me and all the assistance provided.

Best regards,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

~ “And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD” Psalms 40:3

From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 12:41 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
Apologize for not getting back to you, these e-mails got snagged in our spam filter.

Glad you enjoyed our article in T&D...You ask some great questions below! The work we have done here at Great River Energy has been focused on age and condition analysis of the existing system for long-term reliability. We worked through MISO, our regional system operator, relative to broader applicability “upgrade analysis” portion, and utilize EPRI’s (Electric Power Research Institute) HVDC sector for applied research. Similarly, our contacts at ABB are project management, transformer replacement, and engineering and design for “retrofit” projects.

My suggestion would be to reach out to California ISO, as they would be able to provide the HVDC vs HVAC analysis criteria and financial thresholds. Not sure if EPRI would be very helpful outside it’s utility membership, however, that would be another source of excellent information.

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Thursday, January 31, 2019 2:30 PM
To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: HVAC vs. HVDC

EXTERNAL

Hi Tony:

How are you? I am following up on my earlier request below which I sent the first of this month requesting some information as to HVDC comparisons with HVAC electric transmission lines. I know you have a busy

schedule and perhaps impacted with all the cold weather. However, I was wondering if you will be able to assist me in this information? And if not, can you direct me to a source within your company to assist me and our county commissioners in this matter?

I would appreciate any assistance you may offer us or contact source for the information listed.

Thank you Tony, for your time and assistance in this matter. Have a Blessed day!

Best regards,
Donald Beck

Don Beck Bronzes

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tel: 541 524 1633
add: P.O. Box 713, Baker City, OR 97814

~ “And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD” Psalms 40:3

From: Don Beck [<mailto:donbeck@donbeckbronzes.com>]
Sent: Wednesday, January 9, 2019 12:56 PM
To: 'tramunno@greenergy.com' <tramunno@greenergy.com>
Subject: HVAC vs. HVDC

Great River Energy www.greatriverenergy.com
Att: Tony Ramunno

Dear Tony:

Hi, I have a few questions that I would appreciate some help with. I received an email from T&D World which sparked my interests and having gone to their website <https://www.tdworld.com/overhead-transmission/reliability-upgrade-hvdc-system> I viewed an article on your project “Great River Energy’s HVDC system is made up of a 436-mile (702-km), 400-kV transmission line and two converter stations”.

I would like some technical advice and suggestions as to the HVDC verses the HVAC. I have 15 years’ experience working for Pacific Gas & Electric Co. of California in the 60-70’s. I currently live in the Pacific Northwest in the state of Oregon and an out of state Electric Power Utility Company has proposed installing a 500KV HVAC Overhead Power Transmission Line approximately 300 miles through Oregon. With the potential of forest fires due to any faulty equipment through the forests like was experienced recently in Paradise, CA “The CAMP FIRE” where complete towns, communities of nearly 3000 commercial buildings/businesses and 14,000 residential homes were destroyed and took 88 lives <https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> . Due to this most recent Tragedy and not considering the other fires attributed to this utility company facilities, I was interested in the best and safest method of infrastructure and installation moving forward such as Underground and/or Overhead 500KV HVDC verses Overhead 500KV HVAC Power Transmission Lines?

I am looking for comparison of Installation Facilities and Construction Methods of HVAC and HVDC power transmission. The Best Transmission Infrastructure equipment (facilities) information for the most Safest, Cost Effective and most Conservative means of energy transmission from point A to point B (with less line energy loss along the route) utilizing the new Advanced Technology of HVDC verses utilizing the Past and current methods/facilities of Overhead Line Transmission of 500KV HVAC Energy. Conservation of energy loss and Safety being of greatest importance as well as startup cost difference and long range savings. According to the Power Company it is my understanding with the past and current methods of overhead HVAC that 30% of electric energy is Lost along these long distance overhead power transmission lines. Another concern is the private property owners fear for health and human safety concerns from EMF near to their homes and farm lands with workers working in and around the high voltage lines. Not to mention the rights of way easement litigation and long periods of time for public meetings and approval prior to starting construction which all add up to substantial costs associated with 500KV HVAC Overhead Line Construction. All considerations taken into account I feel that there must be a better alternative to the past installation methods, facilities and construction procedure with all the latest new Advanced Technology of installation and construction of 500KV HVDC power lines, overhead and/or underground.

1. Taking into account of all the New Advanced Technology how does the HVDC Transmission lines differ from current 500 KV High Voltage A/C Lines; cost of installation, methods, safety (EMF's)? Including, above ground or below ground infrastructure potential?
2. Health Risks near installed high voltage 500KV HVAC overhead lines verses 500KV HVDC lines?
3. Costs and savings for installation, facilities and maintenance of HVAC High Voltage verses HVDC High Voltage Transmission infrastructure? Both short term and long term.
4. Cost savings due to 500KV HVAC Line leakage; overall line energy loss in 300 mile distance compared to 500KV HVDC?
5. Are fewer high voltage lines required with either method of transmission, so that more lines could be added in the future to existing electric grid corridor?
6. Best Infrastructure System through Farm Lands, Private Property, Rural Communities, Towns and aesthetics in Historic Site areas, Tourism and with improved public relations and potential for public support rather than concerns for health related issues and other negative impacts, including potential cause of forest fires. As we can see even the risk for the potential of one forest fire by faulty power company's equipment can outweigh the savings of the entire cost of installation of any proposed overhead 500KV HVAC Power Transmission Line to the Electric Utility Power Company, not to mention private property and human life.
7. In addition perhaps you could put me in contact with someone at www.abb.com if you feel that they could be of further assistance to us.

Being a retired PG&E Construction employee from Northern California with the installation experience in 500KV HVAC Power Transmission and distribution lines with this new era of Advanced Technologies I would like to know the Best alternatives today in comparisons of construction methods of the Past use of overhead HVAC Power Transmission Lines verses HVDC Power Transmission Lines and the feasibility of Underground verse Overhead infrastructure?

Our goal is finding a solution with less impact on health and safety of our citizens, small Rural Communities, Towns, Private Property, Exclusive Farm Lands and Historic Sites in Oregon, which includes to help eliminate the negative impact associated with AC 500KV HVAC Power Transmission Lines and their unsightly 200' Structures in a Tourist region. Public relations by working with locals would be beneficial to all parties and would insure shorter start up construction times, from the drawing board to the final installation, with possibly no litigation involving rights of way easements and the like associated with overhead 500KV HVAC Power Transmission lines and overall cost savings and advantages in the long term.

Any and all information would be very helpful and grateful.

Thank you Tony, for your time and assistance and I look forward to hearing from you.

Best regards,
Donald Beck

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

~ “And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD” Psalms 40:3

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TARDAEWETHER Kellen * ODOE

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Monday, July 15, 2019 1:43 PM
To: comment@boardmantohemingway.com
Cc: 'Stokes, Mark'; 'Jeff Maffuccio'; 'David Yeakley'; comment@boardmantohemingway.com; bharvey@bakercounty.org; 'Greg Smith'; 'Greg Smith'; senator_wyden@wyden.senate.gov; SEN Bentz; REP Findley; mbennett@bakercounty.org; TARDAEWETHER Kellen * ODOE; odoe@service.govdelivery.com; 'gov'
Subject: [Fortimail Spam Detected] RE: In opposition to B2H Idaho Power proposed route through Baker County

Dear Sirs/Madam:

Thank you for your response and for the record we all have done that for many years now to no avail....Idaho power by their persistence is only interested in saving themselves money with the least expensive installation method to reap huge profits from cheap energy with no concerns for we the people or our communities even with the latest new HVDC Technologies available today and currently proven and used all across our Nation and around the world for many years. High Voltage D/C power affords the safest method of transmission of energy through our valuable timber resources removing the potential of deadly Forest Fires and public health issues; both from EMF Hazards and deaths caused by potential Devastating Forest fires, not accounting for air quality and subsequent respiratory damage caused.... The potential for their High Voltage A/C infrastructure to cause forest fires like California experienced recently in three separate Forest Fires caused by Pacific Gas & Electric Company's faulty infrastructure are not just confined to California Forests, but Oregon communities are just as vulnerable to fires from any High Voltage A/C Transmission Energy lines faulty conductors and/or infrastructure. No one seems to fully understand the urgency or to really be concerned about safety until after these disasters, but most interested in their own bottom line, the buck, at the risk of human lives and private property and local communities. Safety of human life must be a priority of any new installation and hopefully in time retrofit existing HVAC Transmission line through our Forests to make our lives better, safer and preserve our renewable resources our Forests.

Again, with all due respect as Citizens of Oregon we do expect our government agencies who have the Oversight and Authority to approve or not approve these requests from Big Energy Corp, such as Idaho Power to fully investigate and become educated in all latest methods of installation alternatives and be well informed as to the Truth with Safety of Human Life, Forest Timber Resources, private and rural communities property a Priority, and not just side with Big Energy Corp's unwillingness to use the latest Technology in the transportation of High Voltage Energy. As citizens we all are forced use the newest and latest technologies or be left behind and it is time for Big Corporations to incorporate these latest technologies that can prevent these tragic Disasters and loss of human lives. Knowing there are solutions and preventive measure available today that were not available decades ago. We have no excuse for blatantly ignoring the facts now that we know there are better and safer and less expensive ways when considering no energy loss along these HVDC lines to transmit High Voltage Energy though our communities and forests.

I think this is an issue that Government oversight commissions should be very concerned about and do some diligent investigations and insights as to what are the potential dangers to the public and the best alternative to alleviate the potential for devastation as we Now know exists from HVAC Energy Transmission

infrastructure, not to mention the savings of loss of energy for the entire transmission route, not just taking the word of Big Energy, thus Idaho Power at the risk of our communities, rural economies and human lives. Public Relations works both ways, not this is what we are going to do like it or not attitude. Let us all resolve to always to the right thing in the best interest of people's lives.

I find all these continual meetings yield nothing, but only offer of a pacifier to the public thinking they are open and listening and yet they still never give up or compromise their original proposed plan and route at the expense of those of us who have to live with the after affects and the known potential dangers and disasters it will present in time, hoping the citizens will give up and they can ramrod their original routes and outdated methods of installation.

Respectfully,
Donald R. Beck
Baker City, OR

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

Baker City, OR 97814

- "Truly my soul silently waits for God; From Him comes my salvation. He only is my rock and my salvation; He is my defense; I shall not be greatly moved" Psalm 62:1-2

From: comment@boardmanto hemingway.com [mailto:comment@boardmanto hemingway.com]

Sent: Monday, July 15, 2019 10:49 AM

To: donbeck@donbeckbronzes.com

Cc: 'Stokes, Mark' <MStokes@idahopower.com>; Jeff Maffuccio <jmaffuccio@idahopower.com>

Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Hi Don,

Thank you for your comment, we appreciate you taking the time to share your thoughts.

If you would like to discuss the project further, Idaho Power would be happy to meet with you. Feel free to reach out to Jeff Maffuccio (jmaffuccio@idahopower.com) and Mark Stokes (mstokes@idahopower.com) if you would like to arrange a meeting.

All the best,
The B2H Team

From: Don Beck <donbeck@donbeckbronzes.com>

Sent: Friday, July 12, 2019 2:55 PM

To: Kellen.Tardaewether@oregon.gov; odoe@service.govdelivery.com

Cc: David Yeakley <dyeakley@charter.net>; comment@boardmanto hemingway.com; bharvey@bakercounty.org; Greg Smith <smith.g.rep@state.or.us>; Greg Smith <bakercountyedc@gmail.com>; Senator_Merkley@Merkley.senate.gov <Senator_Merkley@Merkley.senate.gov>; senator_wyden@wyden.senate.gov; Sen.CliffBentz@oregonlegislature.gov; Rep.LynnFindley@oregonlegislature.gov; mbennett@bakercounty.org

Subject: FW: In opposition to B2H Idaho Power proposed route through Baker County

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

Dear Sir/Madam:

Re: Public Comment Deadline Extension and Transcripts Available on Proposed Boardman to Hemingway Transmission Line

Comment for the Record:

It is time that Public Utilities become more interested in safety of Human lives, private and commercial property and our natural resource Timber (Forests) and rural community economic resources in light of the horrific death toll caused by Forest Fires resulting from Utility Company faulty Power Lines and Equipment such as Pacific Gas & Electric Company infrastructure that caused the deadly "Camp Fire" in Northern California town of Paradise and outlying communities.... Please view my herein correspondence with a Utility Company who is familiar with HVDC Power Transmission of energy with much Less loss of energy along the transmission route and safer for people, animals; domestic and wildlife, property and our Valuable Timber resource, our Forests. This newest technology is being used all around the world today with success and offers the most safest method of transmission of power energy with less Loss of energy, Waste of Energy along the transmission line.

There are better alternatives today, both in underground and/or HVDC Power Transmission lines than current HVAC, with no hazardous EMF danger. Power Energy Corporations and government oversight agencies must take into account the latest 21st century technology available today to protect Human Lives, Commercial and Private Property and protect our valuable Timber, our Forests, against such Preventable tragedies....not to mention citizens health related problems caused by all the smoke from these fires over the obstinate Big Energy Corporation's only concern for their bottom line utilizing the most least expensive routes and installation methods available today with no concern or regards for the public health & rural Oregon Communities. The savings of loss of energy along these long routes is not considered in costs as these costs are passed on to the consumer...less loss of energy/wasted energy is a huge savings to the consumer and if absorbed by the Power Energy Corporations they would be encouraged to find better alternatives. Lives are more valuable than dollars.

Human lives, private property, rural communities and our valuable forest timber resources must be first priority...cheapest is not always cheapest when seeing the devastation and the Cost Burden now facing Pacific Gas & Electric Company of California, not to mention all the personal suffering of victims.... Oregon is not exempt from such disasters and is a ticking time bomb that all will be responsible for by ignoring the potential of other such fires in rural Oregon. There have been several California forest fires triggered by Pacific Gas and Electric Company's Power Energy Transmission lines and failed infrastructure and these are not limited to California.

Thank you for your time and consideration.

Respectfully,
Donald R. Beck
Baker City, OR 97814

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

Baker City, OR 97814

- "Truly my soul silently waits for God; From Him comes my salvation. He only is my rock and my salvation; He is my defense; I shall not be greatly moved" Psalm 62:1-2

From: dyeakley@charter.net [<mailto:dyeakley@charter.net>]
Sent: Friday, July 12, 2019 1:14 PM
To: 'donbeck@donbeckbronzes.com' <donbeck@donbeckbronzes.com>
Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Have you sent this to the Energy Facility Siting Council? Input is due by July 23, and you could forward this information to:

B2H.DPOComments@Oregon.gov

I took the council standards, and went through them to show why the line should not be built.

Take care.

From: "Don Beck"
To: bharvey@bakercounty.org
Cc: "David Yeakley", "Cliff Bentz", "Congressman Greg Walden", "Greg Smith", "Greg Smith"
Sent: Monday February 4 2019 4:23:16PM
Subject: RE: In opposition to B2H Idaho Power proposed route through Baker County

Dear Commission Bill Harvey:

Greetings and Happy New Year! For the record and for your information as well as those working on the opposition of the BH2 Idaho Power transmission line I would like to forward to you the information that I received to my inquiry as to the best solution for installation and long term feasibility & safety of HVDC power verses HVAC power the current method of transportation. HVDC would not present the EMF human safety affects nor the potential of forest fires, like what transpired by the Californian P.G.&E. Co of California which is now in bankruptcy due to "CAMP FIRE" where complete towns, communities of nearly **3000 commercial buildings/businesses** and **14,000 residential homes** were destroyed and took **88 lives** <https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> This is a very Important aspect of the problem with HVAC overhead power lines. Communities and Lives are put at risk and we cannot afford to ignore this potential in Baker County just to allow Idaho Power to dictate their most economically based installation methods, which does not take into consideration the Power Loss along the entire distance of the Transportation of Power. It is not a matter of if, but when! As you investigate P.G.& E.'s account or record this was not the first nor only accounts of their facilities causing loss of life, forests and property, just the straw that broke the camel's back. They have been proven to lie when investigations that occurred in support of their faulty facilities on numerous occasions. Money should not dictate objectives over the Lives and Communities, Towns and Forests.

With the newest and latest advancement technology age that we now live in there are better, safer and more efficient ways of doing business and the Big Electric Corporation should respect the lives and communities that

they want to just mow through thinking of and only putting the dollar first and now, before lives and loss revenue due to Power Loss along these lines annually.

After considering my questions in the correspondence below and the contact I was given for further answers of my questions perhaps you could forward this information to whomever is in the position for the County to represent the opposition to B2H Idaho Power proposed route through Baker County to Boardman, OR so that they can be equipped with questions that need answers and follow through with the best method for our community in best interest of Baker County citizen's lives, property owners, including safety from EMF affects then present findings to Idaho Power.

Thank you Bill, and all the best to you. We greatly appreciate your leadership.

Best regards,
Donald Beck

Don Beck Bronzes

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>

email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

~ "And He hath put a new song in my mouth, even praise unto our God: many shall see it, and fear, and shall trust in the LORD" Psalms 40:3

From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 3:02 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
I'd say 400 + miles as the threshold of cost/benefit for HVDC

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Monday, February 04, 2019 4:10 PM
To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: RE: HVAC vs. HVDC

EXTERNAL

Thank you Tony: One last question what is considered long distance? We are talking about 400 miles here.

Thanks,
Donald Beck

Don Beck Bronzes

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add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 1:23 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
ISO is an independent system operator, and as Oregon does not have its own, the California ISO is the closest one and would be more geographically relevant than our Midwest system operator.

Due to the complexity of HVDC systems, I'd not expect HVDC to be the future of HV overhead lines...my perspective is HVDC overhead makes sense for long distances with a dedicated purpose. Outside of the United States, HVDC (non-classic technology) is being utilized for under water and other unique applications...EPRI would be a great resource here!

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Monday, February 04, 2019 3:07 PM
To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: RE: HVAC vs. HVDC

EXTERNAL

Hi Tony:

I understand fully, the internet is a great too, but with it comes all the need for protection filters.

I wanted to question your suggesting contacting California ISO, not knowing what this stands for my question is do you think they would cover the state of Oregon, or mistype? If, so would you have a contact for state of Oregon?

From your own perspective is HVDC the future of HV overhead lines? Any pros and cons that you can share?

Thank you again Tony.

I appreciate your getting back with me and all the assistance provided.

Best regards,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>

tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Ramunno, Tony GRE-MG [<mailto:TRamunn@GREnergy.com>]
Sent: Monday, February 4, 2019 12:41 PM
To: donbeck@donbeckbronzes.com
Subject: RE: HVAC vs. HVDC

Donald,
Apologize for not getting back to you, these e-mails got snagged in our spam filter.

Glad you enjoyed our article in T&D...You ask some great questions below! The work we have done here at Great River Energy has been focused on age and condition analysis of the existing system for long-term reliability. We worked through MISO, our regional system operator, relative to broader applicability "upgrade analysis" portion, and utilize EPRI's (Electric Power Research Institute) HVDC sector for applied research. Similarly, our contacts at ABB are project management, transformer replacement, and engineering and design for "retrofit" projects.

My suggestion would be to reach out to California ISO, as they would be able to provide the HVDC vs HVAC analysis criteria and financial thresholds. Not sure if EPRI would be very helpful outside it's utility membership, however, that would be another source of excellent information.

Thanks,
Tony Ramunno

From: Don Beck <donbeck@donbeckbronzes.com>
Sent: Thursday, January 31, 2019 2:30 PM
To: Ramunno, Tony GRE-MG <TRamunn@GREnergy.com>
Subject: HVAC vs. HVDC

EXTERNAL

Hi Tony:

How are you? I am following up on my earlier request below which I sent the first of this month requesting some information as to HVDC comparisons with HVAC electric transmission lines. I know you have a busy schedule and perhaps impacted with all the cold weather. However, I was wondering if you will be able to assist me in this information? And if not, can you direct me to a source within your company to assist me and our county commissioners in this matter?

I would appreciate any assistance you may offer us or contact source for the information listed.

Thank you Tony, for your time and assistance in this matter. Have a Blessed day!

Best regards,
Donald Beck

[Don Beck Bronzes](#)

Visit our on-line Gallery: <http://www.donbeckbronzes.com/>
email: <mailto:donbeck@donbeckbronzes.com>
tel: 541 524 1633

add: P.O. Box 713, Baker City, OR 97814

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From: Don Beck [<mailto:donbeck@donbeckbronzes.com>]
Sent: Wednesday, January 9, 2019 12:56 PM
To: 'tramunno@greenergy.com' <tramunno@greenergy.com>
Subject: HVAC vs. HVDC

Great River Energy www.greatriverenergy.com
Att: Tony Ramunno

Dear Tony:

Hi, I have a few questions that I would appreciate some help with. I received an email from T&D World which sparked my interests and having gone to their website <https://www.tdworld.com/overhead-transmission/reliability-upgrade-hvdc-system> I viewed an article on your project “Great River Energy’s HVDC system is made up of a 436-mile (702-km), 400-kV transmission line and two converter stations”.

I would like some technical advice and suggestions as to the HVDC verses the HVAC. I have 15 years’ experience working for Pacific Gas & Electric Co. of California in the 60-70’s. I currently live in the Pacific Northwest in the state of Oregon and an out of state Electric Power Utility Company has proposed installing a 500KV HVAC Overhead Power Transmission Line approximately 300 miles though Oregon. With the potential of forest fires due to any faulty equipment through the forests like was experienced recently in Paradise, CA “The CAMP FIRE” where complete towns, communities of nearly 3000 commercial buildings/businesses and 14,000 residential homes were destroyed and took 88 lives <https://www.cbsnews.com/live-news/california-fires-containment-search-rescue-air-2018-11-22-camp-woolsey-paradise-live-updates/> . Due to this most recent Tragedy and not considering the other fires attributed to this utility company facilities, I was interested in the best and safest method of infrastructure and installation moving forward such as Underground and/or Overhead 500KV HVDC verses Overhead 500KV HVAC Power Transmission Lines?

I am looking for comparison of Installation Facilities and Construction Methods of HVAC and HVDC power transmission. The Best Transmission Infrastructure equipment (facilities) information for the most Safest, Cost Effective and most Conservative means of energy transmission from point A to point B (with less line energy loss along the route) utilizing the new Advanced Technology of HVDC verses utilizing the Past and current methods/facilities of Overhead Line Transmission of 500KV HVAC Energy. Conservation of energy loss and Safety being of greatest importance as well as startup cost difference and long range savings. According to the Power Company it is my understanding with the past and current methods of overhead HVAC that 30% of electric energy is Lost along these long distance overhead power transmission lines. Another concern is the private property owners fear for health and human safety concerns from EMF near to their homes and farm lands with workers working in and around the high voltage lines. Not to mention the rights of way easement litigation and long periods of time for public meetings and approval prior to starting construction which all add up to substantial costs associated with 500KV HVAC Overhead Line Construction. All considerations taken into account I feel that there must be a better alternative to the past installation methods, facilities and construction procedure with all the latest new Advanced Technology of installation and construction of 500KV HVDC power lines, overhead and/or underground.

1. Taking into account of all the New Advanced Technology how does the HVDC Transmission lines differ from current 500 KV High Voltage A/C Lines; cost of installation, methods, safety (EMF's)? Including, above ground or below ground infrastructure potential?
2. Health Risks near installed high voltage 500KV HVAC overhead lines verses 500KV HVDC lines?
3. Costs and savings for installation, facilities and maintenance of HVAC High Voltage verses HVDC High Voltage Transmission infrastructure? Both short term and long term.
4. Cost savings due to 500KV HVAC Line leakage; overall line energy loss in 300 mile distance compared to 500KV HVDC?
5. Are fewer high voltage lines required with either method of transmission, so that more lines could be added in the future to existing electric grid corridor?
6. Best Infrastructure System through Farm Lands, Private Property, Rural Communities, Towns and aesthetics in Historic Site areas, Tourism and with improved public relations and potential for public support rather than concerns for health related issues and other negative impacts, including potential cause of forest fires. As we can see even the risk for the potential of one forest fire by faulty power company's equipment can outweigh the savings of the entire cost of installation of any proposed overhead 500KV HVAC Power Transmission Line to the Electric Utility Power Company, not to mention private property and human life.
7. In addition perhaps you could put me in contact with someone at www.abb.com if you feel that they could be of further assistance to us.

Being a retired PG&E Construction employee from Northern California with the installation experience in 500KV HVAC Power Transmission and distribution lines with this new era of Advanced Technologies I would like to know the Best alternatives today in comparisons of construction methods of the Past use of overhead HVAC Power Transmission Lines verses HVDC Power Transmission Lines and the feasibility of Underground verse Overhead infrastructure?

Our goal is finding a solution with less impact on health and safety of our citizens, small Rural Communities, Towns, Private Property, Exclusive Farm Lands and Historic Sites in Oregon, which includes to help eliminate the negative impact associated with AC 500KV HVAC Power Transmission Lines and their unsightly 200' Structures in a Tourist region. Public relations by working with locals would be beneficial to all parties and would insure shorter start up construction times, from the drawing board to the final installation, with possibly no litigation involving rights of way easements and the like associated with overhead 500KV HVAC Power Transmission lines and overall cost savings and advantages in the long term.

Any and all information would be very helpful and grateful.

Thank you Tony, for your time and assistance and I look forward to hearing from you.

Best regards,
Donald Beck

Don Beck Bronzes

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email: <mailto:donbeck@donbeckbronzes.com>
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add: P.O. Box 713, Baker City, OR 97814

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ESTERSON Sarah * ODOE

From: Mickie Bell <marcyne5@hotmail.com>
Sent: Thursday, August 22, 2019 4:14 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 0/28/2018; Draft Proposed Order 5/23/2019

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senion Siting Analyst
Oregon Dept of Energy
550 Capitol Street N>E.
Salem, OR 97301

Via E-mail: B2H DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft PROPOSED Order 5/23/2019

To Chairman Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be **significantly affected by the Transmission Line.**

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C:Property Location and Maps; Exhibit L; Protected Areas; Exhibit R: Scenic Aesthetic Vallues; Exhibit S: Cultural Resources; Exhibit T; Recreational Facilities and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times; EFCS has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

B2H Transmission Line should be buried for approximately 2 to 2 1/2 miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating under-grounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined the IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refuse to approve the Draft Project for the following reasons.

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the interpretive Center and Hiking trails noise will be disturbing. Map23 in Attachment X-1 does not even show the Oregon Trail.

2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.

3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.

4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered under-grounding for the protection of the Oregon Trail. No analysis found the pristine Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long - 117.750194 or 44 degrees 48ft 48.26"N 117degrees 75ft 57.97"W. IPC proposes to build a new construction road over the Oregon Trail in the area identified in the location above.

5. the DPO does not meet the standards required for Exhibit T Recreational facilities, OAR 345-022-0100, especially at the Flagstaff Hill Interpretive center, because of:

- a. It is a BLMACEC area managed for public tourism.
- b. It is the single most visited tourist facility in Baker County.**
- c. The quality of the facility is outstanding.**
- d. There is no other place where the Oregon Trail can be seen and interpreted.**

6. the cost estimates of IPC do not compare with those of the Edison Electric Institute, January 2013 publication "out of Sight, Out of Mind, An Updated Study of the Under-grounding of Power Lines." This article suggests that for 2.5 miles of rural under-grounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

The Oregon Trail along the route of the B2H has the most damaging effects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. **Once gone, always gone.** The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the side certificate for the Boardman to Hemingway Transmission Project.

Thank you,

Marcyne Bell
3126 Elm Street
Baker City, OR 97814

marcyne5@hotmail.com



Virus-free. www.avg.com

1112 1/2 Adams Ave
La Grande, OR 97850

Energy Facility Siting Counsel
Attn: Tardeweth
Oregon Dept. of Energy
550 Capitol St., NE
Salem OR

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DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

B2H EFSC FAILURE TO SURVEY ACCESSIBLE AREAS FOR NORTHERN GOSHAWK AND AMERICAN THREE-TOED WOODPECKER, FAILING TO PROVIDE CURRENT INFORMATION, AND FAILURE TO COMPLETE SURVEYS IN ACCESSABLE AREAS.

The developer indicates that reasons for incomplete surveys was because the landowners would not give permission, timing conflicts, or the need to cross parcels not approved to access the area. The applicant failed to survey 287 locations. Many are located along the applicant's "preferred option". In fact, it appears that no surveys were performed from Mile Post 95 to Mile Post 115 which is virtually the entire length of Idaho Power's preferred alternative near the city of La Grande. There are also many locations from approximately Mile Post 95 to Mile Post 105 which are accessible, but have not been surveyed. See Figure P1-1, Page P1-II of application.


Literally 1/3 of the required surveys have not been completed, and the surveys which were completed were done in 2011 and 2012. The limited additional surveys done in 2016 did not include American three-toed woodpeckers which are listed as sensitive in the analysis area. The developer is proposing no additional surveys be performed. The developer provided misleading information regarding the surveys when they listed in Figure P1-1 that surveys were completed in 2016. Only a small area was surveyed in 2016 and not for both species. In addition, none of the areas where the alternate route exists in Union County were surveyed. The applicant is proposing that a site certificate be issued based upon these dated, minimal surveys with no new surveys being conducted.

The lack of surveys in the areas near Ladd Marsh is very disturbing. There is the potential for both these bird species to be present in the area. It is part of the Survey Area, however, there are practically no surveys along the proposed line. There is no basis for failing to complete surveys on all areas that can be accessed. This project was initiated over 10 years ago. Completed surveys should have been provided in the application, not 2/3 of them. The applicant has failed to comply with the requirements of OAR 345-021-0060 regarding completion of surveys and cannot be found to be in compliance with OAR 345-022-0060.

The developer is proposing no additional surveys. The Site Certificate cannot be issued absent the developer providing current surveys of accessible areas. There is no exemption allowing a developer to provide no current information and no determination can be made regarding eligibility absent any reliable information regarding impacts to these protected birds. This material needs to be in the application prior to the Site Certificate being issued.

Signature/name

Address:


Kathy Benson
1211 E Delta, Union

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

B2H EFSC FAILURE TO SURVEY ACCESSIBLE AREAS FOR NORTHERN GOSHAWK AND AMERICAN THREE-TOED WOODPECKER, FAILING TO PROVIDE CURRENT INFORMATION, AND FAILURE TO COMPLETE SURVEYS IN ACCESSABLE AREAS.

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Signature/name



Kately Reagon

Address:

121 E Delta Union OR

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,


Signature

Katy Benson

Printed Name:
Mailing Address:

121 E Delta Union OR

ESTERSON Sarah * ODOE

From: Ruth Betza <rebetza@gmail.com>
Sent: Thursday, August 22, 2019 12:22 PM
To: B2H DPOComments * ODOE
Subject: Please Deny B2H

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/018;
Draft Proposed Order 5/23/2019

Dear Chair Beyeler and Members of the Council,

Please deny the site certificate for B2H. I am a landowner, voter and tax payer of Union County Oregon who cannot see any benefit to my County or my State from this huge project that comes from Idaho.

We citizens have to adhere to Union County planning rules so I don't see how a project from Idaho should be able to get around them.

As an avid outdoors person and lover of natural beauty I am against an unnecessary transmission line running through Glass Hill or the high country above La Grande. We love our outdoors—that's why we live here.

We don't need or want B2H. There is no benefit to Union County or to Oregon.

I respectfully ask you to deny the site permit.

Ruth Betza
76372 Palmer Junction Road
Elgin, Oregon 97827
rebetza@gmail.com
(541) 437-9201

ESTERSON Sarah * ODOE

From: Linda Birnbaum <birnbaumlinda42@gmail.com>
Sent: Tuesday, August 20, 2019 11:28 AM
To: B2H DPOComments * ODOE
Subject: Wildfire and land stability concerns

August 20, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,

Linda Birnbaum

Name:

Address: 64540 Cherrywood Road
La Grande, OR. 97850

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

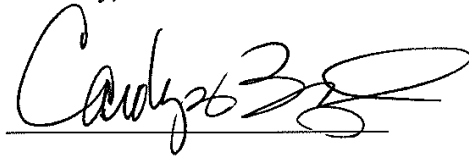
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

A handwritten signature in black ink, appearing to read "Carolyn Floyd", written over a horizontal line.

Name: CAROLYN FLOYD

Address: 702 2nd
LaGrande OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Sylvia Bowers
Mailing Address (mandatory) 2490 Baker Street
Baker City, OR, 97814
Phone Number (optional) () _____ Email Address (optional) ssbowers1@bakerlib.org
Today's Date: 6-19-19
Do you wish to make oral public testimony at this Hearing: Yes _____ No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

The concerns I would like to address regarding the
construction of this power line are 1) aesthetic quality and
natural beauty of the Baker Valley that encourages
indoor recreation and historic tourism. 2) the economic
health and growth of this area resulting from
Baker Co. being a popular area for newly retired persons

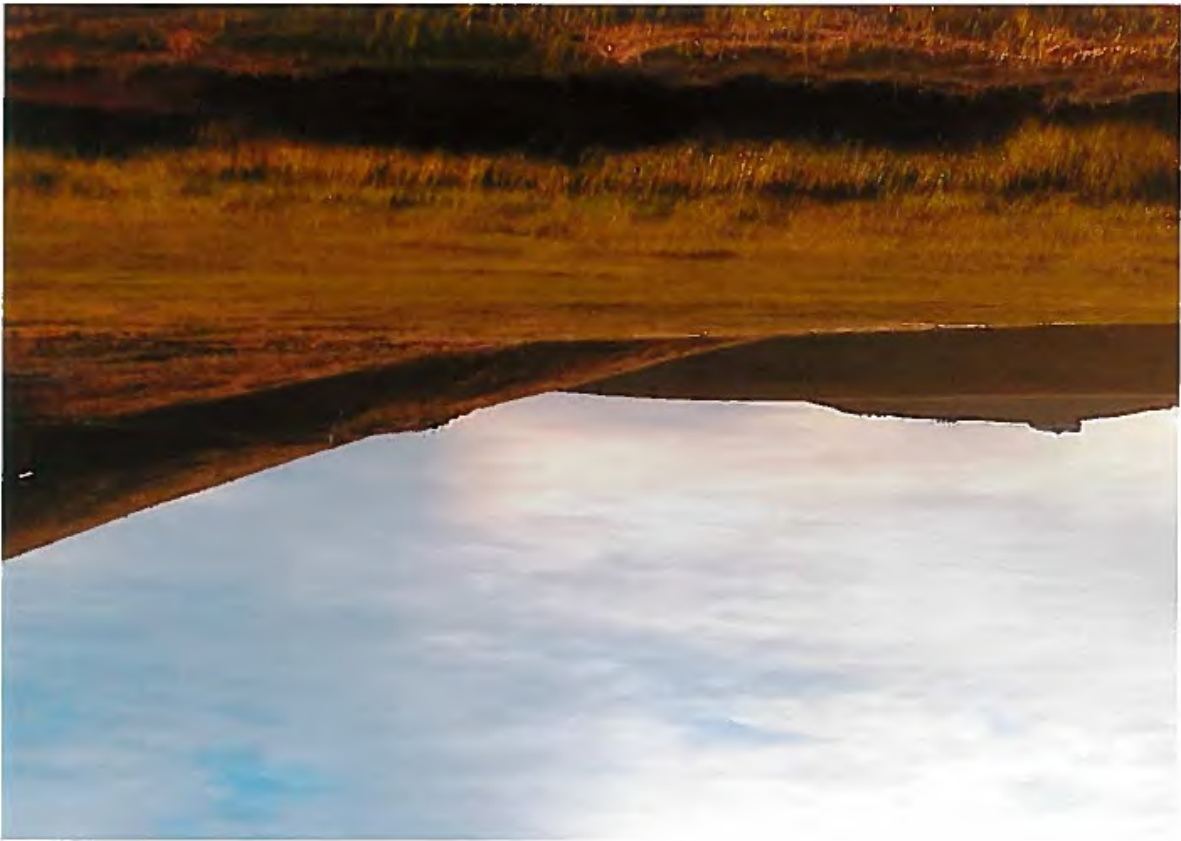
(additional space for written comments)

to relocate to. I think the building of
the transmission lines would jeopardize
both of these benefits we have from
having a beautiful, undamaged natural
environment. I would like to see the
Oregon Department of Energy committee consider promoting
more local-friendly, human-friendly energy options
that does not include the proposed Vicks Power
transmission line and that reflect current
and emerging sustainable energy options.











Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) JERRY L. BOWMAN

Mailing Address (mandatory) 2197 Rock Springs Canyon Rd
Nyssa, OR 97913

Phone Number (optional) (541) 1372-5360 Email Address (optional) _____

Today's Date: 6-18-19

Do you wish to make oral public testimony at this Hearing: Yes 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

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Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

POWER LINES WILL BE TOO CLOSE TO RESIDENTS. COULD BE

BETTER ROUTES TO ELIMINATE EMF

NOISE LEVEL OF TRANSMISSION LINES

RED TAIL HAWKS NESTS

BALD EAGLE NEST WITHIN 1/4 MILE

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1 SECRETARY CORNETT: So we have one more
2 comment card, it's from Idaho Power Company. My
3 understanding is only if the Council members have
4 questions for them; is that correct? So if Council
5 members have any questions based on the testimony that
6 they've heard from others, if they'd like to follow up
7 with any questions with Idaho Power Company, they are
8 available to answer your questions.
9 VICE CHAIRMAN JENKINS: So I'd like Idaho
10 Power to talk about the tower placement between milepost
11 255 and 258, if they could, please.
12 SECRETARY CORNETT: So we can also take a
13 short break if Council and presiding officer is
14 interested to give Idaho Power a little bit of time to
15 think about responding or you could respond now if you'd
16 like.
17 MR. MARK STOKES: If we could have a few
18 minutes to at least look at the map.
19 HEARING OFFICER WEBSTER: Is Council good with
20 taking a ten-minute break and reconvening?
21 VICE CHAIRMAN JENKINS: Sure.
22 HEARING OFFICER WEBSTER: It's 6:05 now.
23 Let's reconvene at 6:15 to hear from Idaho Power.
24 (Recess taken.)
25 HEARING OFFICER WEBSTER: We will go back on

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1 the record here.
2 Just a couple of housekeeping things. First
3 of all, we have another member of the public who I
4 strong-armed into giving comment. So Mr. Bowman, if you
5 would like to come up, and then we will hear from
6 Mr. Stokes with Idaho Power. And when we're done with
7 that, just to give everybody, some late stragglers if
8 they have come in, the opportunity, we, the people from
9 the Department and me and probably the people from Idaho
10 Power, will be here until 8:00. So if there's somebody
11 that does come in late that still wants to give comment.
12 But after we hear from these two gentlemen here, we will
13 go I think probably back on break and then we will
14 reconvene again if somebody else comes in and wants to
15 give a comment.
16 So, Mr. Bowman, if you would state your name
17 and your address.
18 MR. JERRY BOWMAN: My name is Jerry Bowman. I
19 live at 2197 Rock Springs Canyon Road. I'm adjacent
20 property owner to Jim Foss.
21 That power line is going to be coming within
22 feet of my property. I'm concerned about the noise
23 level, I'm concerned about the electromotive force. We
24 have several nests of red-tailed hawks within a quarter
25 of a mile of where the transmission line is going to be.

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1 We have a continuous nest of bald eagle that is in the
2 same vicinity, within a quarter of a mile.
3 And I think that there was a proposed area for
4 the transmission line which was a little ways south of
5 where we are. A couple of miles on up the canyon
6 there's already a transmission line crossing. Why can't
7 they put the proposed transmission line adjacent to that
8 one? It's already designated for that type of system.
9 That's all I have. Thank you.
10 HEARING OFFICER WEBSTER: Thank you.
11 Mr. Stokes; correct?
12 MR. MARK STOKES: Yes.
13 HEARING OFFICER WEBSTER: If you would state
14 your name and your I guess work address and we'll go
15 from there.
16 MR. MARK STOKES: Mark Stokes. I'm an
17 engineering project leader for Idaho Power, address 1221
18 West Idaho Street, Boise, Idaho 83702.
19 And I guess to start off, I'd like to welcome
20 all of the Council members here. I appreciate you
21 traveling over here this week and next week as well.
22 We'll all be seeing a lot of each other both weeks.
23 To address the specific question that was
24 brought up, Councilman Jenkins, would you want to
25 restate your question.

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1 VICE CHAIRMAN JENKINS: Sure.
2 So my question goes back to Jay Chamberlin's
3 comment about the tower placement between milepost 255
4 and 258. There was concern -- I'll just leave it at
5 that.
6 MR. MARK STOKES: Okay. After looking at our
7 map set through that area, a lot of the folks that have
8 commented this evening are in that same area, and I was
9 able to confirm that our original land was to route
10 south of that area. The reason that route is not in the
11 project right now is because BLM had determined due to
12 the scenic and natural area south of these parcels and
13 the proximity to the Owyhee River and the siphon and
14 that whole area, BLM was not willing to leave the route
15 south of these parcels. So that's really, the route got
16 changed in the whole NEPA process and was moved to where
17 it is now. That was part of the agency-preferred route
18 for BLM. So in a nutshell that's my response to that
19 question.
20 I've got a copy of this map if any of you
21 would like to look at more specific details there. But
22 that is the background of that area.
23 Now, a little more specifically, I wanted to
24 comment, Mr. Proesch contacted our office just yesterday
25 morning, that was the first time we had had any

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment U2 9 from the application shows an "Aerial Lift Crane to be Used During Construction" and the Transportation and Traffic Plan on page 19 10 lists a number of other vehicles anticipated to be used. Article 6.6 — Public Street Standards for the City of La Grande Section 6.6.002 states that "Collector Streets are designed to withstand normal trucks of an HS20 loading. Larger trucks are to utilize Arterial Streets where at all possible." 11 The majority of vehicles listed on page 19 exceed that limit and would be using a Local Street in addition to Arterial and Collector Streets. According to the Public Works Director the two streets in the "loop" were designed as Local Streets for residential use, able to accept the pressures of HS20 for the purpose of an occasional need such as a weekly garbage truck or an emergency vehicle but for no more than 5% of the time. The paving construction of these over 50 year old streets in the "loop" was not designed for repetitive use by vehicles heavier than a normal car. These streets in the "loop" have not been repaved, only patched when necessary, since they were first constructed.

The application does not address the "loop" specifically, but 3.1.2 (pg. 19) 10 and Table 6 (pg.17) 12 of the Transportation and Traffic Plan indicate there would be numerous vehicles using this route. Not knowing exactly just which vehicles would be on the "loop" daily but making a conservative estimate of 50 round trips (100 single) it would be a constant parade with one truck every 7.2 minutes. This is unacceptable for numerous reasons including constant excessive noise.

Not only would weight of the vehicles be a problem but the narrowness of the "loop" streets and the ninety degree blind curves that would have to be executed would be either impossible or extremely dangerous considering the turning radius for many of these large vehicles. The

already dangerous situation for a number of driveways that exit onto these "loop" streets at blind curves would be exacerbated. 13-14

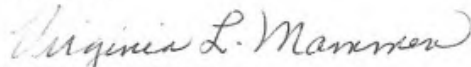
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for walking (children to school, all ages for physical training), driving, or biking. I fear there are standards that are either not being considered or they are intentionally being ignored. There should be some common sense, courtesy and respect for the impact this project would impose on any neighborhood.

Finally, La Grande Ordinance Number 3077, which adopted Oregon State Traffic Laws by reference, states in Section 17 page 8 "It shall be unlawful for any person, firm or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes." Neither Modelaire/Hawthorne Loop nor Sunset Drive are posted as truck routes. 15-16

A site review and traffic plan must be completed prior to the cite certificate being issued and not 90 days prior to construction as stated.

For the above reasons I oppose the usage of the proposed route for the construction of the B2H transmission line.

Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon. 97850

gmammen@eoni.com

Exhibit 1

City of La Grande Ordinance Number 3242,
 Series 2018
 Page 236 of 312

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

²The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³These right-of-way width ranges are for new streets.

⁴Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

Exhibit 2

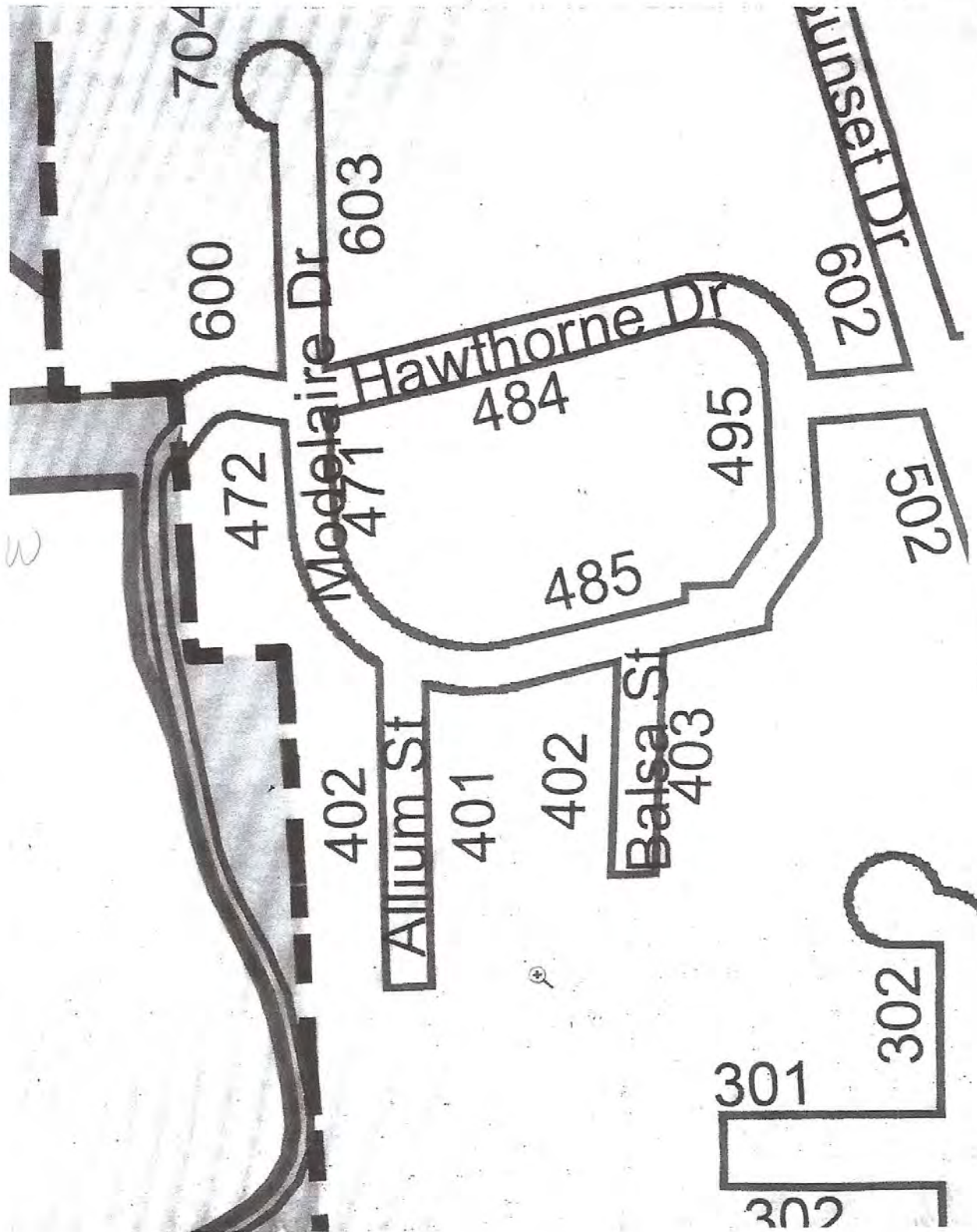


Exhibit 3

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

103

IV. CONCLUSIONS

104 Based on the Findings of Fact above, the Planning Commission concludes that the application meets the
105 requirements established in LDC Articles 8.5 and other applicable codes and Ordinances.

106

107

V. ORDER AND CONDITIONS OF APPROVAL

108 Based on the conclusions above, the Planning Commission approves the Conditional Use Permit as
109 requested, subject to the following Conditions of Approval:

- 110 1. No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is
111 developed to a residential standards and is not designed to support commercial traffic.
- 112 2. Any existing driveway curb cuts along Hawthorn Drive bordering GRH's property, that are not used for
113 residential purposes, shall be removed and replaced with City standard improvements that exists
114 adjacent to such areas.
- 115 3. There is a storm sewer line extending through the project area that shall to be protected. Any
116 improvements that may affect the storm sewer line shall be reviewed and approved by the Public Works
117 Director.

118

119

VI. STANDARD CONDITIONS OF APPROVAL FOR LAND USE APPLICATIONS

- 120 1. **Revisions to a Valid Conditional Use Permit:** Any variations, alterations, or changes in a valid
121 Conditional Use Permit requested by the deed holder shall be considered in accordance with the
122 procedures of the Land Development Code as though a new Conditional Use Permit were being applied
123 for.
- 124 2. **Public Works Standards:** Where a development involves work within the public right-of-way, a Right-
125 of-Way Permit shall be obtained from the Public Works Department in advance of commencing with any
126 work in the right-of-way. All improvements within the public right-of-way shall be in conformance with the
127 most recent adopted City of La Grande "Engineering Standard Drawings and Specifications for
128 Construction Manual."
- 129 3. **Building Permits:** The City of La Grande Building Department shall be contacted early in the process
130 and in advance of development to coordinate and obtain required building, plumbing, electrical and/or
131 mechanical permits. All required permits shall be acquired in advance of construction.

132

133

VI. OTHER PERMITS AND RESTRICTIONS

134 The applicant and property owner is herein advised that the use of the property involved in this application
135 may require additional permits from the City of La Grande or other local, State or Federal Agencies.

136 The City of La Grande land use review, approval process and any decision issued does not take the place of,
137 or relieve the applicant of responsibility for acquiring such other permits, or satisfy any restrictions or
138 conditions thereon. The land use decision herein does not remove, alter, or impair in any way the covenants
139 or restrictions imposed on this property by deed or other instrument.

140 The land use approvals granted by this decision shall be effective only when the rights granted herein have
141 been exercised and commenced within one (1) year of the effective date of the decision. In case such right
142 has not been exercised and commenced or an extension obtained, the approvals granted by this decision
143 shall become null and void. A written request for an extension of time shall be filed with the Planning
144 Department at least thirty (30) days prior to the expiration date of the approval.

145

146

7/25/2019

Gmail - Modelaire Roadway Specifications

Exhibit 6



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



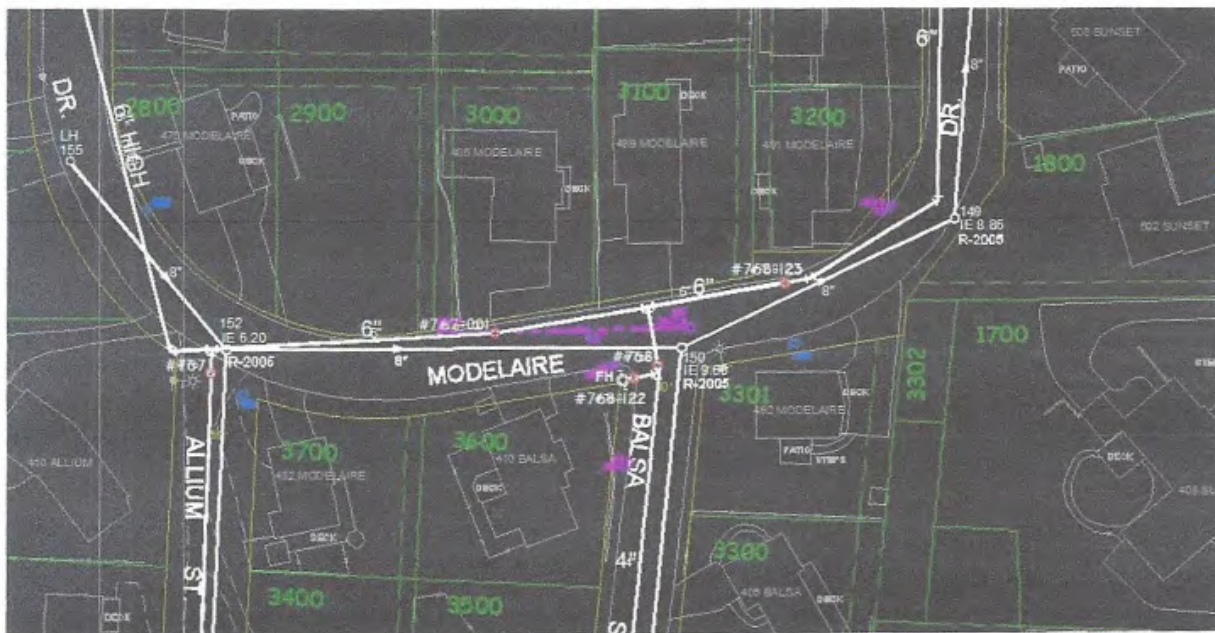
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

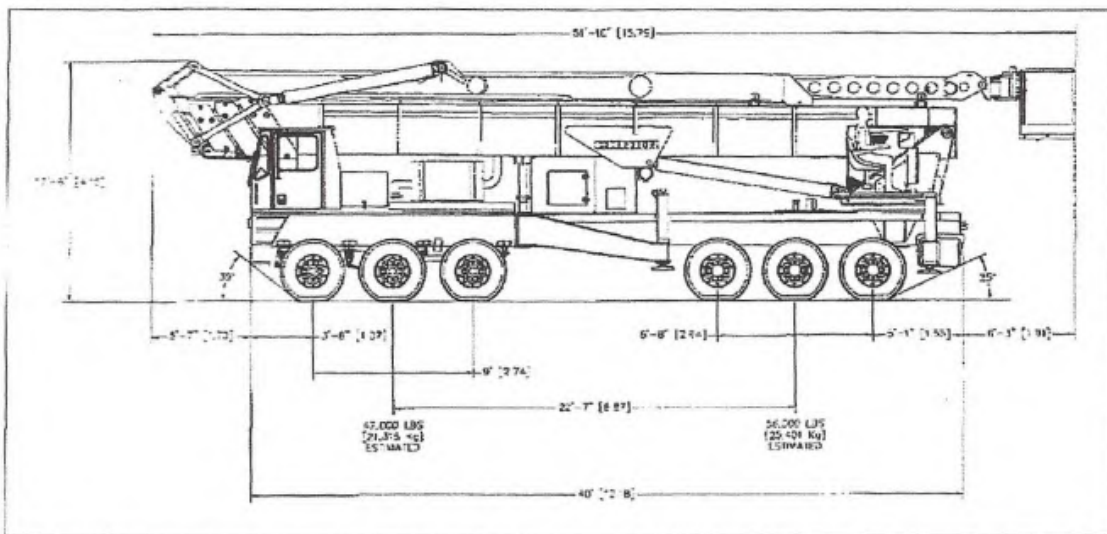


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

City of La Grande Ordinance Number 3242,
Series 2018
Page 252 of 312

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Exhibit 12

Transportation and Traffic Plan

Boardman to Hemingway Transmission Line Project

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

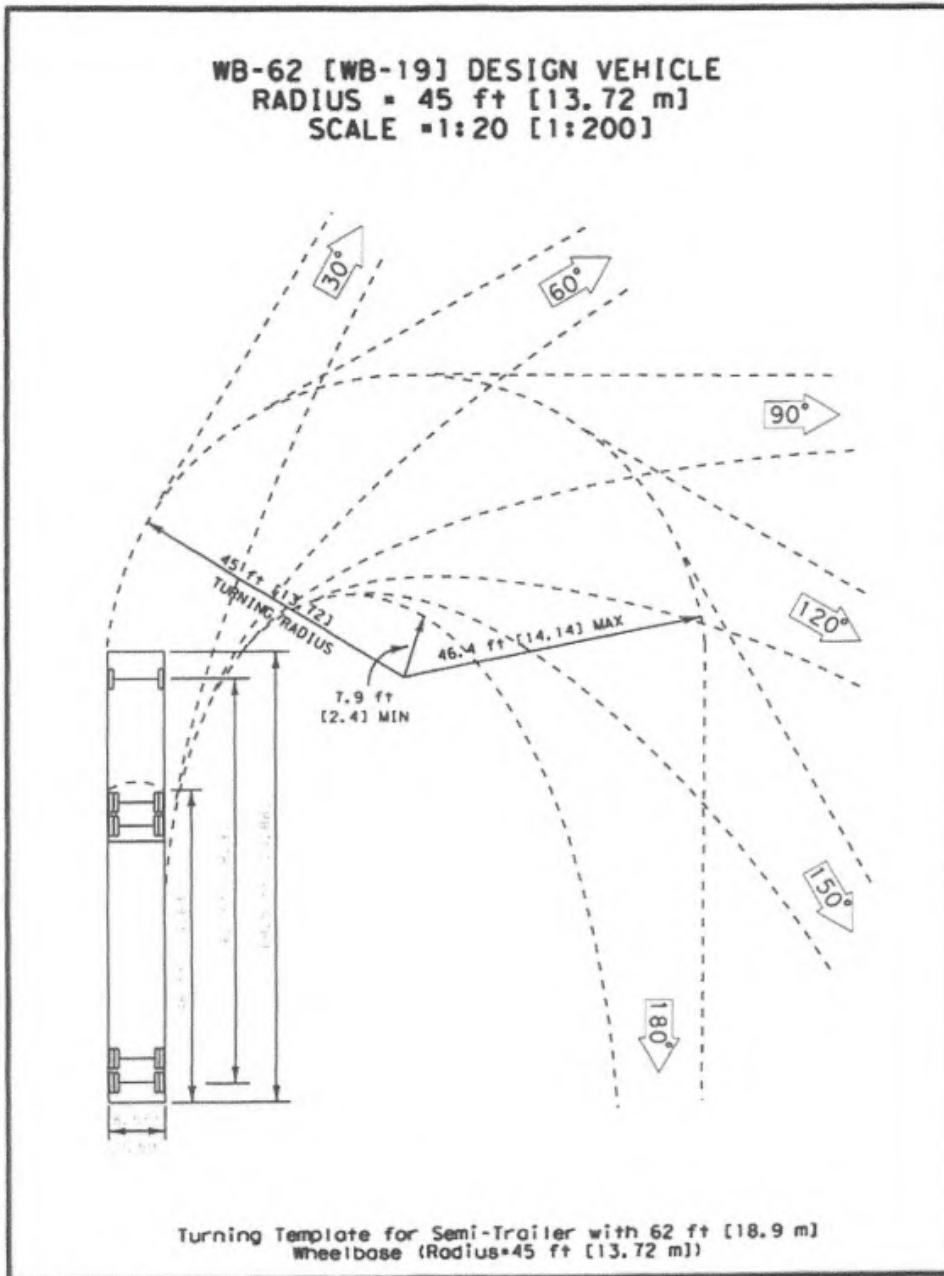


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

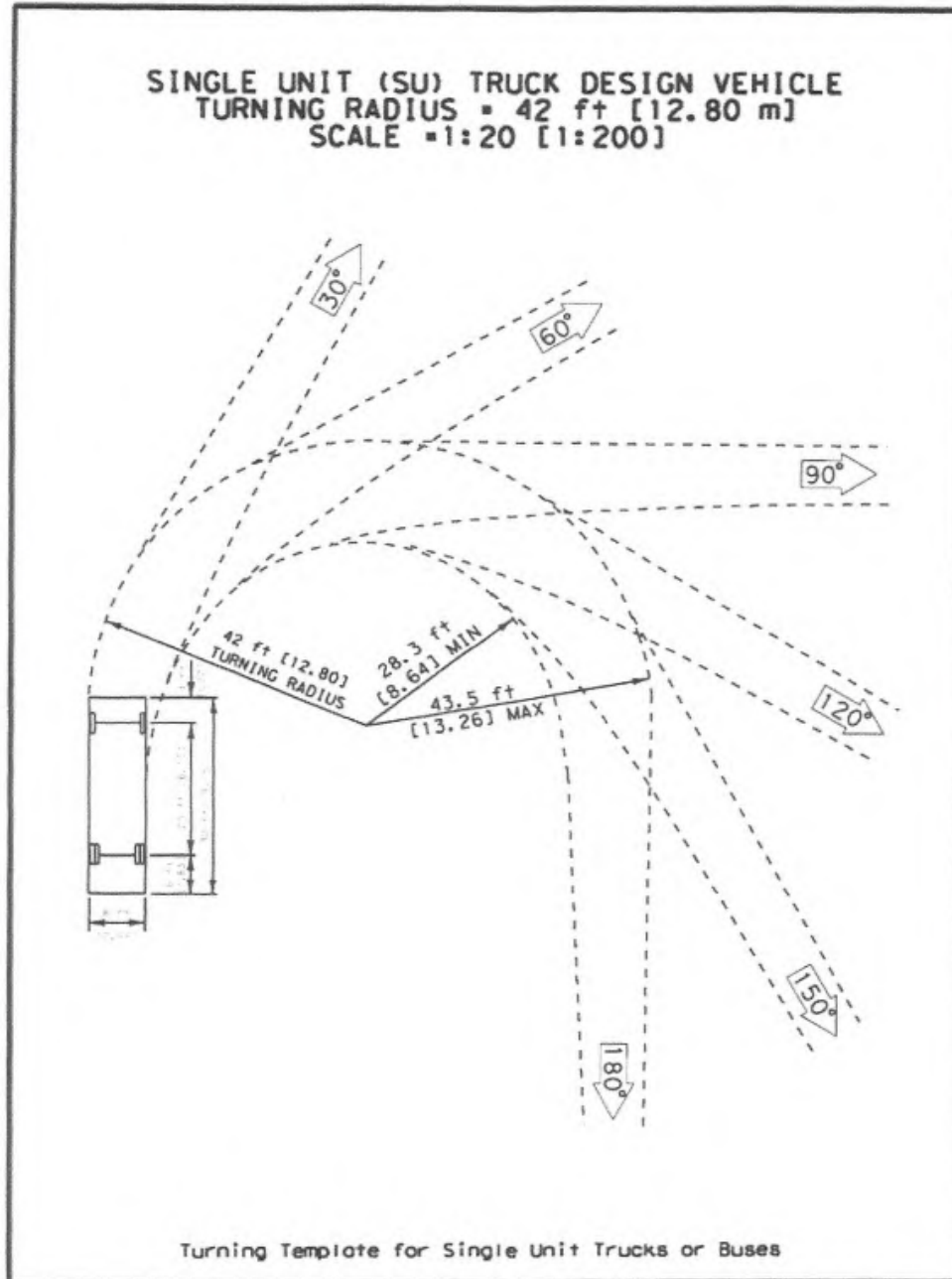


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

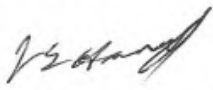
Section 17. TRUCK ROUTES

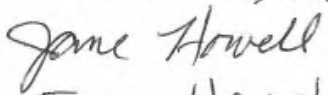
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

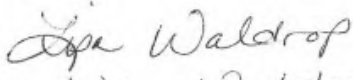
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

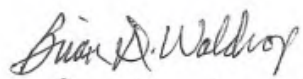
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

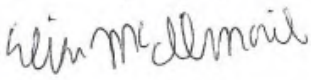
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
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EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
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EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRE DR.
EMAIL mcilmail154@hotmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850
jessiehuxell@live.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

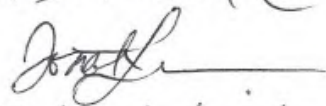

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

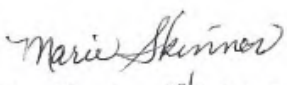

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

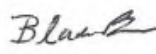

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

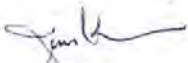
ADDRESS


EMAIL

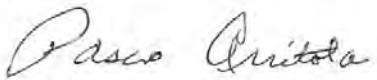

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME Dale Mammen
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EMAIL dmammen@comi.com


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EMAIL jkreider@campblackdog.org

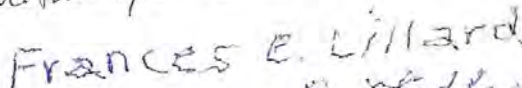
SIGNATURE 
PRINTED NAME Judie Arritola
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EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
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EMAIL

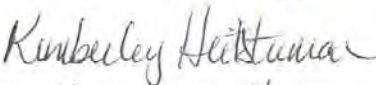
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
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PRINTED NAME Frances E. Lillard
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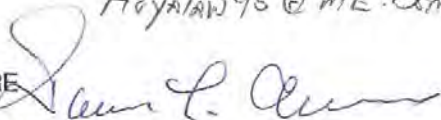
SIGNATURE 
PRINTED NAME Brent H. Smith
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EMAIL smithbrent@gmail.com

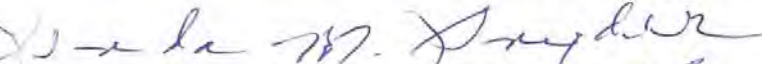
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

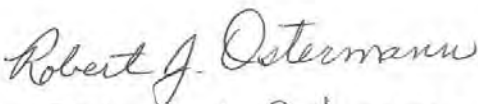
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE: 
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410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

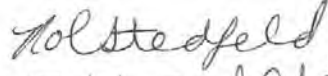
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

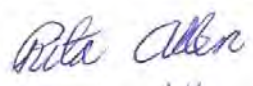
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PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

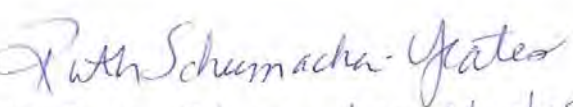
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PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

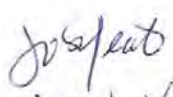
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

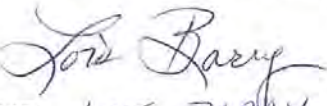
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

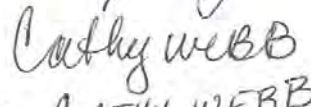
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

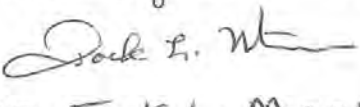
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

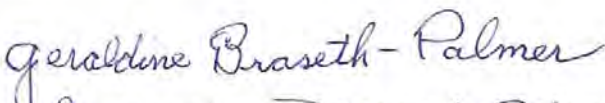

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

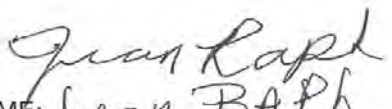
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

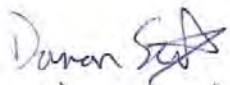
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

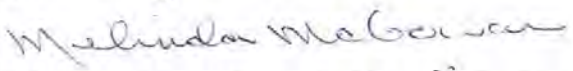
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 BLDENEST DRIVE LA GRANDE, Ore 97850
EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jraph19@gmail.com

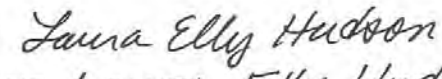
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda 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 v1wd1910@gmail.com

SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
ADDRESS 86 Hawthorne Dr. La Grande, OR 97850
EMAIL acavinat@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR
EMAIL joehorst@ecni.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, LaGrande, Or. 97850
EMAIL asherei@frontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Modelaire Dr. La Grande, OR 97850
EMAIL hnull@comi.com

SIGNATURE *Bert R. Frewing*
PRINTED NAME Bert R. Frewing
ADDRESS 709 South 12th Street LaGrande, OR 97850
EMAIL jeanfrewing@gmail.com

SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay 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 2009 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*
ADDRESS 1511 W Ave LG
EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Belketer 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 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

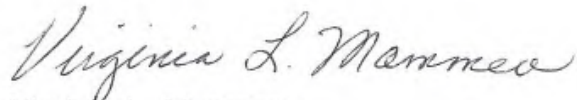
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰ These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable.¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

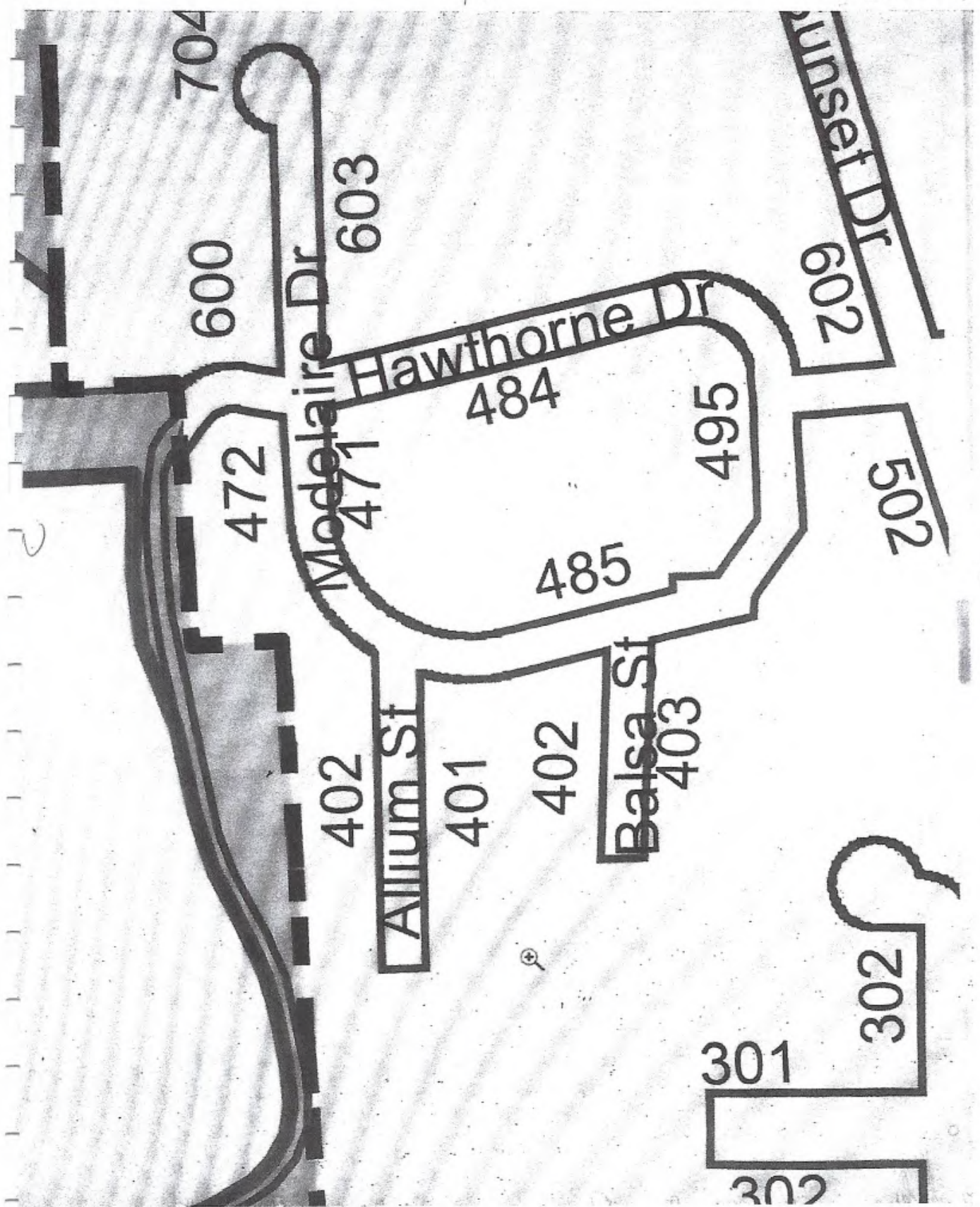
Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1



N

17

5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

3.3 Predicted Noise Levels

OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation of the proposed facility.

3.3.1 Construction Noise

3.3.1.1 Predicted Construction Noise Levels

Project construction will occur sequentially, moving along the length of the Project route, or in other areas such as near access roads, structure sites, conductor pulling sites, and staging and maintenance areas. Overhead transmission line construction is typically completed in the following stages, but various construction activities may overlap, with multiple construction crews operating simultaneously:

- Site access and preparation
- Installation of structure foundations
- Erecting of support structures
- Stringing of conductors, shield wire, and fiber-optic ground wire

The following subsections discuss certain construction activities that will periodically generate audible noise, including blasting and rock breaking, implosive devices used during conductor stringing, helicopter operations, and vehicle traffic.

Blasting and Rock Breaking

Blasting is a short-duration event as compared to rock removal methods, such as using track rig drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills. Modern blasting techniques include the electronically controlled ignition of multiple small-explosive charges in an area of rock that are delayed fractions of second, resulting in a total event duration that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.

Lattice tower foundations for the Project typically will be installed using drilled shafts or piers; however, if hard rock is encountered within the planned drilling depth, blasting may be required to loosen or fracture the rock to reach the required depth to install the structure foundations. Final blasting locations will not be identified until an investigative geotechnical survey of the analysis area is conducted during the detailed design.

The contracted blasting specialist will prepare a blasting plan that demonstrate compliance with applicable state and local blasting regulations, including the use of properly licensed personnel and the acquisition of necessary authorizations. The Framework Blasting Plan is set forth in Exhibit G, Attachment G-5.

Implosive Devices

An implosive conductor splice consists of a split-second detonation with sound and flash. Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be developed by an individual certified and licensed to perform the work. The plan will communicate all safety and technical requirements including, but not limited to, delineation of the controlled access zone and distance away from residences.

Exhibit 3

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

- This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety.
- Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



8/5/2019

Oregon Secretary of State Administrative Rules

Exhibit 4a

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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.

Exhibit 4b

8/5/2019

Oregon Secretary of State Administrative Rules

(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;

Exhibit 5a

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.

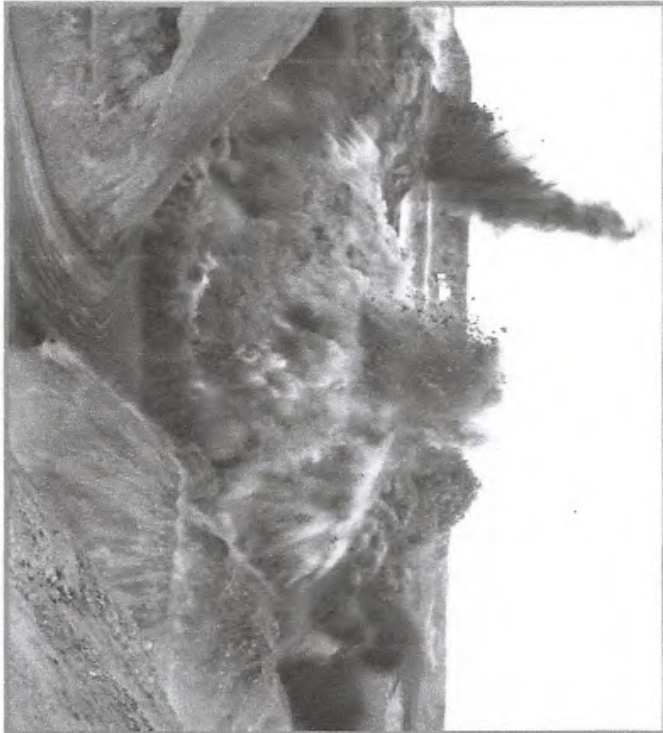
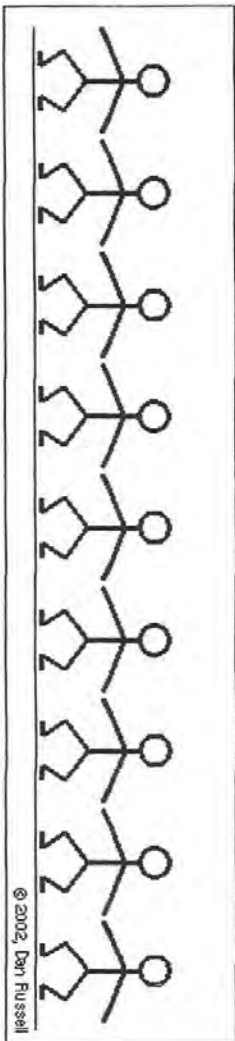


Exhibit 56

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.

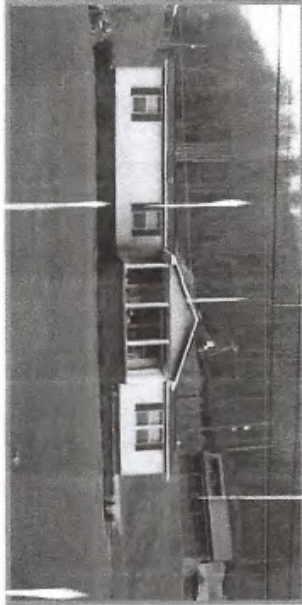
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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.

Exhibit 5g

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

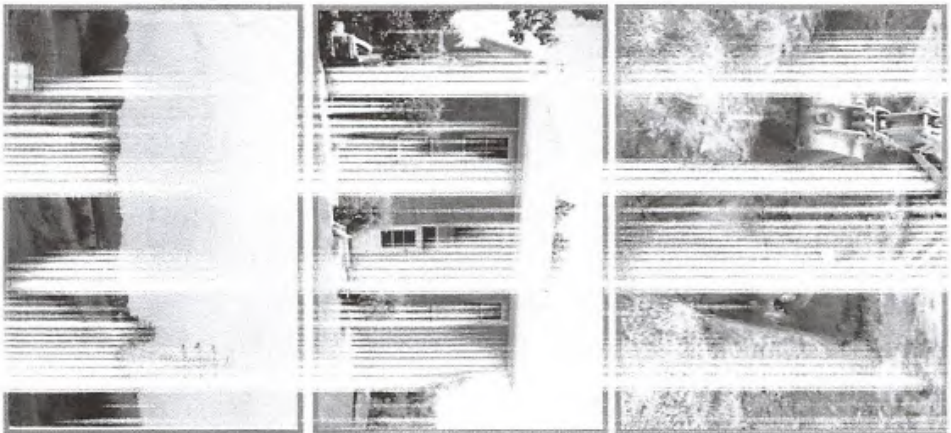
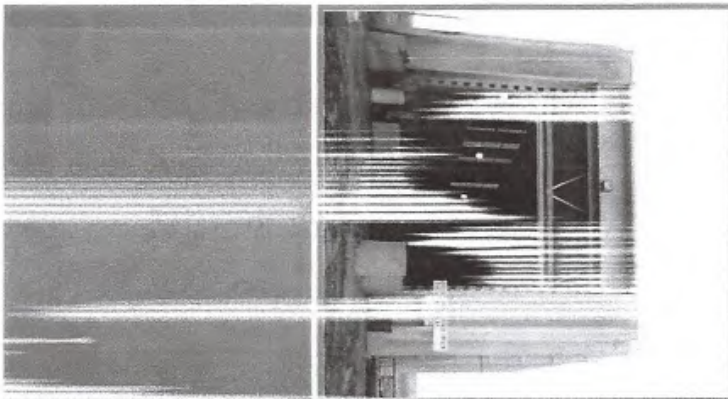
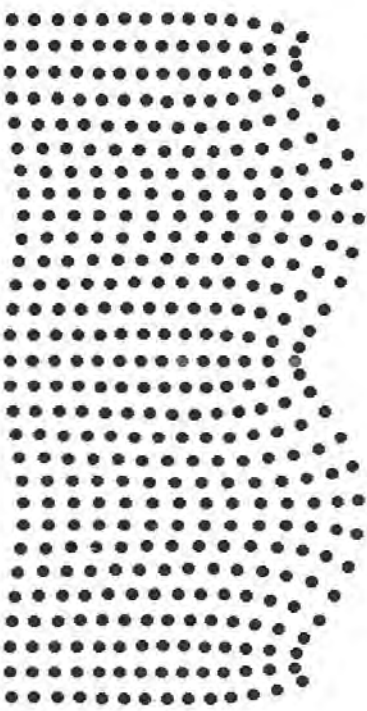


Exhibit 5D

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.

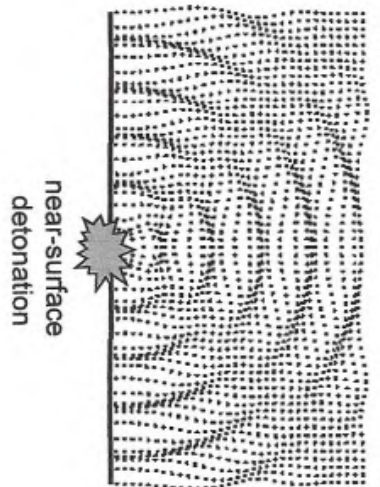
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

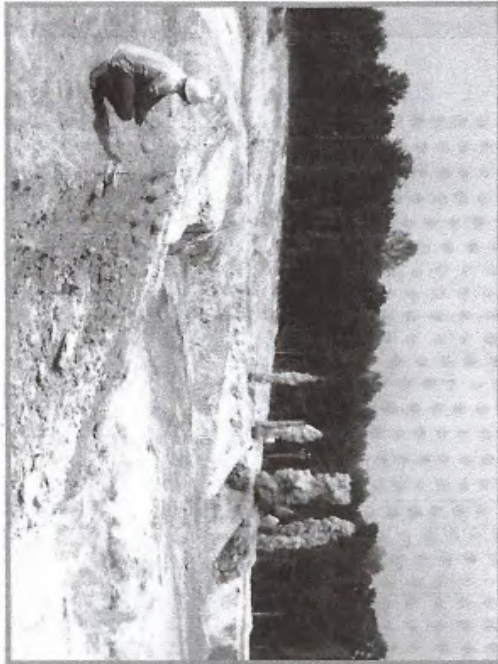
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or in-audible. Elevated airblast levels are generated when explosive energy in the form gases escape from the detonating blast holes. Energy escapes either through the top stemming or through fractures in the rock along the face or at the ground surface.



Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

Both ground vibrations and airblast cause structures to shake structures. Occupants in structures that are located far from a blast may experience shaking from vibration and airblast as two separate, closely spaced events. This can be particularly bothersome, as it prolongs the duration of structure shaking and leads the property owner to think that two separate blasts occurred.



Structure Response

Exhibit 5 F

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

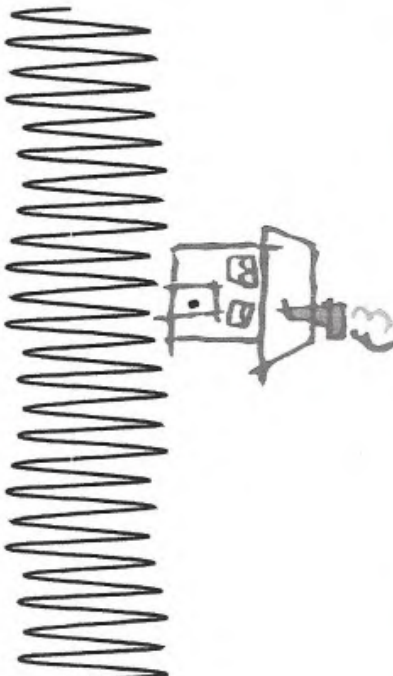
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

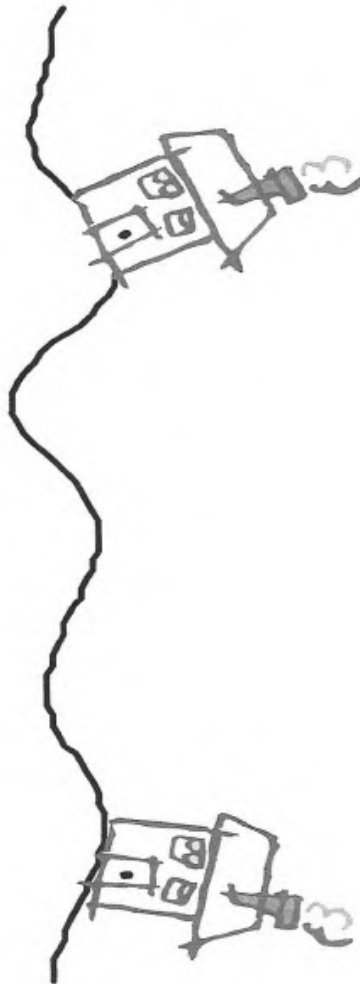


Ground Vibration Structure Response

Exhibit 5g



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 - Harvard Health

Exhibit 16
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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."

Exhibit 7a

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal



UVM Medical Center Blog (<https://medcenterblog.uvmhealth.org>) » Blog (<https://medcenterblog.uvmhealth.org/blog/>) »
Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

on June 7, 2018 (<https://medcenterblog.uvmhealth.org/innovations/hospital-noise-reduction/>) in Innovation (<https://medcenterblog.uvmhealth.org/category/innovations/>) by UVM Medical Center (<https://medcenterblog.uvmhealth.org/author/uvmmedcenter/>)

Noise. It is present in almost every aspect of our lives. From the traffic in the streets, to the fan that provides us white noise in the background to sleep, noise exists. Unfortunately, like stress, too much of it can have a negative impact on a person's health and rest. Some sounds we do like to hear, such as birds chirping, signaling spring in Vermont, but what about sounds in a hospital?

Many of us get admitted to hospitals when we are too sick to take care of ourselves at home. We expect exceptional care from physicians and nurses and, of course, to rest in order to help our bodies heal. We understand that some noises in a hospital are necessary for care; however, others simply aren't.

The Sounds of a Hospital

Many organizations, including the UVM Medical Center, have high tech equipment, which greatly assists in the delivery of care to our patients, but can also be noisy. Sometimes, healthcare providers are the source of the noise as we interact and communicate with our patients and other health team members.

Another factor is visits from families and friends during visiting hours. It is difficult when one's roommate is trying to rest in the opposite bed. Yet, we need to be cognizant of noise in patient care areas as sounds can be magnified and misinterpreted, increasing agitation and even confusion for some patients.

We become accustomed to the noise; our patients are not.

The Research on Noise, Quiet, and Healing

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal

Exhibit 76

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.

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

Exhibit 8a

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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



Exhibit 8b

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

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).

Exhibit 3

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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 a state-of-the-art facility that has been designed "to encourage quietness," according to Tina Pope, Palomar Health Service Excellence Manager. Slated to open its doors this August, the hospital will feature a new nursing call system to route calls directly to staff and help eliminate the need for overhead paging, de-centralized nursing stations and clear sig lines, allowing staff to check on patients without having to leave unit doors open. With measures already in place including "Quiet Hospital" badges on staff and posters at the entrance of every unit, a "Quiet at Night" campaign (9 p.m. – 6 a.m.), and a "Quiet Champions" program that encourages staff to report noise problems, Palomar is one of a growing number of hospitals working toward a new era of quiet.

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8/6/2019

<https://knops.co/magazine/noise-and-ptsd/>

Exhibit 9
a



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

Exhibit 9b

8/6/2010

trauma or flashbacks.



Fear

PTSD can also cause a general fear of sounds: phonophobia, or a fear of some specific sounds: misophonia. Survivors of the disorder also are generally much more sensitive to sounds and perceive them as much louder than other people would.

All of this makes the life of people with PTSD very hard. If you think you are suffering from this, consult your doctor. Really, please do it. For yourself, and for the ones you love.

Do you have PTSD and would you like to tell your experiences to us? We are always very open and interested to hear what you have to say. And again: if you haven't done it yet, visit your doctor, please. Thank you!

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8/4/2019

Does noise affect learning? A short review on noise effects on cognitive performance in children

Exhibit 10a



Front Psychol. 2013; 4: 578.

PMCID: PMC3757288

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PMID: [24009598](https://pubmed.ncbi.nlm.nih.gov/24009598/)

Does noise affect learning? A short review on noise effects on cognitive performance in children

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This article was submitted to *Developmental Psychology*, a section of the journal *Frontiers in Psychology*.

Received 2013 May 14; Accepted 2013 Aug 12.

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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

8/4/2019

Does noise affect learning? A short review on noise effects on cognitive performance in children

EXHIBIT 1012

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,

8/4/2018



Walk Donate Q

Exhibit 11a

Autism & Anxiety: Parents seek help for extreme reaction to loud noise

September 5, 2018

Our 12-year-old son has autism, mild intellectual disability and anxiety attacks so severe that we end up in the emergency room. Loud noises are the worst – for example the school fire alarm, thunderstorms, a balloon popping, fireworks. Any help would be greatly appreciated.



This week's "Got Questions?" answer is by Judy Reaven, a clinical psychologist and associate professor of psychiatry and pediatrics at the University of Colorado School of Medicine and Children's Hospital Colorado, in Denver. Dr. Reaven's conducted research on the effectiveness of cognitive-behavioral therapy for anxiety in adolescents with autism, with the support of an [Autism Speaks research grant](#).

Editor's note: The following information is not meant to diagnose or treat and should not take the place of personal consultation, as appropriate, with a qualified healthcare professional and/or behavioral therapist.

Thanks for the great question. It certainly sounds like your family is experiencing a very difficult situation. Anxiety symptoms and reactions are very common in individuals with autism spectrum disorder (ASD). They can interfere with functioning across home, community and school settings.

Although your son's reaction sounds more severe than most, many people with autism struggle with a range of fears, phobias and worries. These can range from a debilitating fear of, say, spiders or the dark to chronic anxiety about making mistakes or being late.

Fortunately, recent research suggests that anxiety in children and adults who have autism is quite treatable. Often, these individuals are helped by the same or similar strategies that work well in treating anxiety in the general population.

These approaches include cognitive behavior therapy, or CBT. Cognitive-behavioral approaches are well-established, evidenced-based treatments that have become the gold standard of psychosocial treatments for anxiety. [My own research](#) and that of my colleagues has demonstrated the helpfulness of modifying cognitive-behavioral approaches to address the special needs of those who have autism.

Where to begin?

You describe a number of fears that may be related to sensory sensitivities. I recommend that you begin by consulting an occupational therapist who can assess whether your son's extreme sensitivities to noises are part of a broader sensory processing disorder. If this is the case, and if your son's fears are exclusively triggered by sensory stimuli, then his symptoms may be best addressed by a sensory-focused intervention. Many occupational therapists who specialize in autism receive special training in this area.

It's common for children with ASD and anxiety to become extremely frightened in response to sensory stimuli. Perhaps – like many individuals with autism – your son also has difficulty telling you what's scaring him. Instead, he may show his fear with extreme avoidance of a situation.

8/4/2011

For example, he might refuse to go to school after a fire drill. He might become fearful of birthday parties after being frightened by a balloon that popped unexpectedly. Other signs of extreme distress can include yelling, crying, clinging and general agitation. Because your son may have difficulty communicating, it's important to observe his behavior for these signs of distress. This can help you determine what's triggering his fears.

Avoidance versus learning to cope

Many parents go to great pains to protect their children by avoiding agitating situations. This approach is sometimes appropriate and even necessary. However, it denies individuals the opportunity to learn how to manage anxiety-provoking situations on their own.

By helping your son learn to manage his fear, you can prepare him for an unpredictable world so that he can participate in it to the maximum extent possible.

Given the severity of your son's anxiety symptoms, I suggest that you seek professional support in addition to the strategies offered here. Families whose children have milder symptoms of anxiety can try these strategies on their own – seeking professional help if symptoms worsen.

Tackling one fear at a time

I suggest making a list of your child's major fears and worries. Try to rank order them from mild to severe. To encourage success, I'd start with a mild-to-moderate fear before taking on his extreme reaction to loud noises.

Key components of a cognitive behavioral approach include introducing coping strategies such as deep breathing and "helpful thoughts" that can help a person manage fearful reactions.

For example, you can teach your son to take deep slow breaths to help manage his body's physical anxiety reactions.

"Helpful thoughts" are statements that your son can say to himself when faced with a situation that makes him anxious. For example, you can coach to your son to say, "This is a loud noise. I don't like it, but I can handle it."

To help your son to learn these strategies, I suggest you model taking deep breaths while repeating a "helpful thought" out loud.

Graded exposure

The most important step is to help your son face his fears a little at a time. We call this "graded exposure." For example, explain to your son that the two of you are going to listen to a recording of thunder. The first time, you might play the recording at a soft volume, then gradually increase the volume over time as he demonstrates increased comfort with the sounds

Or you might try watching a video of a balloon pop – perhaps with the volume off the first time. Then he can watch a real balloon pop while standing some distance away. Over time, he can move closer and closer to the balloon.

After such exercises, you can present him with small rewards for being brave and "facing fears." Remember that even a small act of bravery – such as listening to a recording of thunder for 10 seconds – represents an important step toward handling fears. It deserves to be acknowledged.

Although graded exposure may seem counterintuitive, research indicates that this strategy is the single most effective strategy for getting over a particular fear.

I wish you and your son the very best. Please let us know how you're doing with an email to GotQuestions@autismspeaks.org.

60
Pages

Additional Resources & Tools

EXPERT
OPINION

[Help for Child with Autism & Recurring Behavioral Crises: Part 2](#)

EXPERT
OPINION

[Parents Seek Help for Son with Autism and Recurring Behavioral Crises](#)

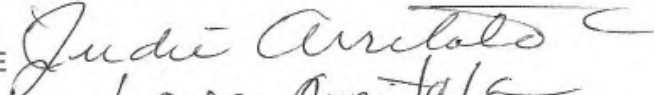



SCIENCE
NEWS


EXPERT
OPINION

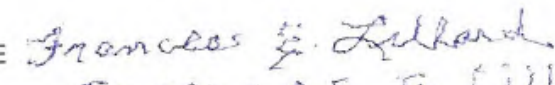
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE 
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SIGNATURE 
PRINTED NAME JOHN GARLITZ
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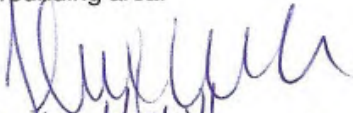
SIGNATURE 
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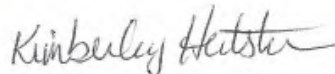
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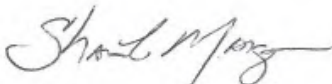
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Shawn K. Mangum

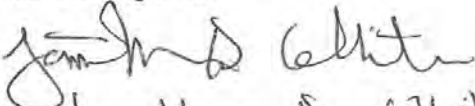
ADDRESS

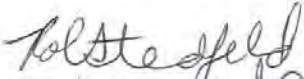
2409 E. M. Ave.

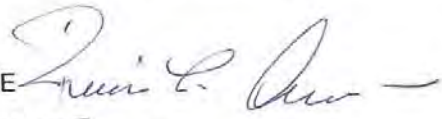
EMAIL

Hoyalaw95@me.com

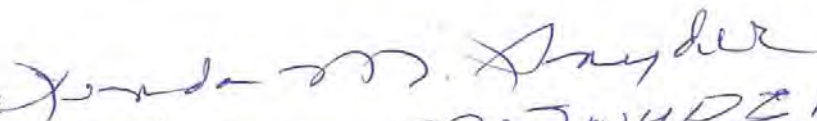
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PRINTED NAME Lonnie L. ALLEN 541-963-7720
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SIGNATURE 
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SIGNATURE 
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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SIGNATURE *Robert J. Ostermann*
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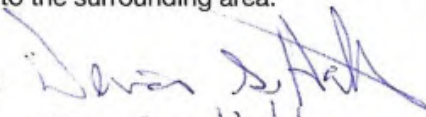
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SIGNATURE



PRINTED NAME

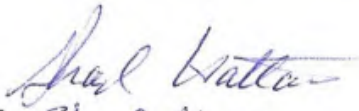
Denise Hattan

ADDRESS

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Shad Hattan

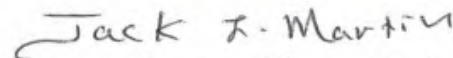
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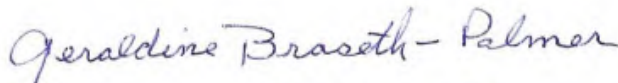
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GERALDINE BRASETH-PALMER

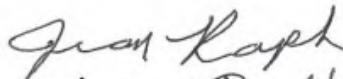
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Jean RAPH

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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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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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SIGNATURE *Joe Horst*
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SIGNATURE *Merle E Comfort*
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SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
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EMAIL

SIGNATURE *Gerald D. Juniper*
PRINTED NAME Gerald Darwin Juniper
ADDRESS 406 4th St. LaGrande, OR. 97850
EMAIL

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SIGNATURE *Robert J. Sherer*
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EMAIL jeanfrewing@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

ESTERSON Sarah * ODOE

From: Vickie Braun <vicbraun57@gmail.com>
Sent: Thursday, August 22, 2019 4:11 PM
To: B2H DPOComments * ODOE
Subject: Subject line : Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

I am writing in regards to the Idaho power application for a site certificate for the Boardman to Hemingway transmission project.

Having lines run over a residential home and having that much power over head is not right!! My grandson Hayden lives there right now where these powerlines are going to be put. I do not want to have 500 kV lines running over the top of his home where he is living. This is dangerous and unsightly to mention!

They have plans for a new home on the property you are trying to put the lines up on.

Having power lines that big by residential and soon to be recreational property with people should not be allowed.

Please do not erect these on this property!

Sincerely

Vickie Braun

Grandmother to Hayden

ESTERSON Sarah * ODOE

From: Vickie Braun <vicbee57@msn.com>
Sent: Thursday, August 22, 2019 4:26 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

I am a grandmother to one of the residents directly impacted by your plans. My grandson lives right where these power lines are going to be erected.

He deserves to live without toxic power lines over head. 500 kilovolt is dangerous to have by residential homes and property to be turned into recreational camping area.

EFSC Must Deny the Site Certificate!

Sincerely

Steve Braun
1374 S 360 W
Payson UT 84651
801-367-4767

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RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre.

They value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the figures they claim apply or the basis for the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant's claims that the land in the right of way will have a further reduced value due to the opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive. It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.) of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the

transmission line is predicted to be in place.

The applicant also claims that the transmission line right of way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on either lands to be directly impacted by the Project or on surrounding lands.

Removing trees from land currently being used to grow them will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line, it will increase time and costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require the use of routes of access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission lines, will decrease the harvest along the transmission line due to loss of trees in forest land adjacent to the corridor due to wind and weather conditions causing the loss of additional trees due to weakened root infrastructure once the transmission corridor is cleared.

The economic, social and environmental impacts of running this transmission line through private forest lands in Union and Umatilla Counties are understated, lack convincing documentation, and the conclusions stated by the applicant in Section 8.0 are absolutely false. Farm and forest lands in Eastern Oregon form the basis of our economic and social well being. This developer shows a complete lack of understanding of the significance this transmission line destruction of forested lands will have on the well being of the citizens.

In addition, the applicant has failed to provide documentation to support their comments. The only reference the applicant sites that in any way relates to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; They have failed to document that they comply with OAR 345-022-0030; and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

There is no justification for determining that the proposed plan to destroy forested lands meets the requirements under OAR 345-022-0000(l)(a) which states "The facility complies with the requirements of the Oregon Energy Facility Siting statutes, ORS 469.300 to 469.570 and 469.590 to 469.619 and the standards adopted by the Council pursuant to 469.501 or the overall public benefits of the facility outweigh any adverse effects on a resource or interest protected by the applicable standards the facility does not meet as described in section (2)."

While it will be addressed in other comments, the cumulative adverse effects of the destruction of forest lands will have significant impacts on not only the economic and social well being of the citizens of Union and Umatilla Counties, but it will also adversely effect Critical Wildlife habitat, Threatened and Endangered Species, increase the potential for wildfire, stress local services, as well as multiple additional resource and interests of concern to the citizens.

LISA K BRIDGE
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LA GRANDE, OR. 97450
Lisa K Bridge

Brown DM
5313 Hwy 203
Winston, OR
97883

RECEIVED
AUG 22 2019
Department of Energy

c/o Kellen Tardewether
Senior Siting Analyst
O.D.Energy
550 Capital St NE
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97301-374239



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20 AUG 2019 PM 3 L



PHOTO AB
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Kellen Tardaewether
Ore Dept. of Energy
550 Capital St NE
Salem, OR 97301

Ann Brown
53313 Hwy 203
Union, OR 97083

Aug 19, 2019

Dear Gentlpersons,

I have written before, and I write again. I do not believe the proposed Boardman to Hemmingway powerline is needed. I do not believe it is in the best interests of the American people. It is not in the best interests of Oregonians, and it especially harms the people and critters of Northeast Oregon.

Whereas other power companies have found it fruitful to generate new power using conservation (eg. rebates for heating/cooling technologies, simple inexpensive insulation, better windows and lighting) Idaho Power has simply ignored these options. Instead, it seems fixed on the idea that our only future is to litter the landscape with hideously ugly towers and powerlines.

Rate-payers will pay, shareholders will reap the gains, and all of us who have eyes will suffer, as will native plants and wildlife.

I am a strong advocate of climate-friendly alternatives to fossil fuels. The 2 degree climate difference that our current president tells us is insignificant is glaringly significant here. We tree farm 4 miles and 1000' elevation from the sagebrush

fringe. I am watching mixed conifer/ponderosa pine woodland transition to sagebrush in my lifetime. Nature did not hang out a sign saying "climate change happening here." But witness: Where did that Juniper seedling come from? What is killing all of these white fir? What I call "Food-dryer wind" has fed megafires all around us. It doesn't take a rocket scientist to say that we are in trouble.

We need power generated close to users to minimize transmission losses.

We need power that comes from sources that are friendly to native species. Solar and wind facilities need to be in areas that are already biological deserts (eg wheatfields, not raptor-friendly ridgetops, and already-impacted sites (rooftops, highways, and brownfields)) We need to reward power companies that insist on these priorities.

Science has allowed us to feed and cloth massively increasing human population. Now science (doesn't matter which "ology" one might choose to look at - climate, life sciences, marine/terrestrial, polar, tropical, soils, etc -) the consensus is overwhelming. We have and continue to soil our own nest to the point of no return, and must put sustainable practices ahead of shareholder profit.

Idaho Power has demonstrated no commitment to any kind of sustainable future. It has demonstrated a firm commitment to shareholder profits. That is not good reason to build B H 2.

Thank you,
Ann Brown
53313 Hwy 203
Union, OR 97883
541-853-2328

TARDAEWETHER Kellen * ODOE

From: Jordan Brown <jordanisbrown@gmail.com>
Sent: Thursday, August 22, 2019 11:33 AM
To: TARDAEWETHER Kellen * ODOE
Subject: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/2018; Draft Proposed Order dated 5/22/2019

Dear Chair Beyeler and Members of the Council;

My comments concern Idaho Power's poorly developed and possibly illegal "Noxious Weed Plan" (DPO Attachment P 1-5) as well as their failure to take into account in any way, the Oregon Conservation Strategy.

The Oregon Conservation Strategy <http://oregonconservationstrategy.org/overview/> is critical for protecting the natural heritage of our state. It *"represents Oregon's first overarching state strategy for conserving fish and wildlife. It uses the best available science to create a broad vision and conceptual framework for long-term conservation of Oregon's native fish and wildlife, as well as various invertebrates, plants, and algae. The Conservation Strategy emphasizes proactively conserving declining species and habitats to reduce the possibility of future federal or state listings. It is not a regulatory document but instead presents issues, opportunities, and recommended voluntary actions that will improve the efficiency and effectiveness of conservation in Oregon."*

Under the Oregon Conservation Strategy, IPC's B2H project is a Key Conservation Issue: *"(KCI)s are large-scale conservation issues or threats that affect or potentially affect many species and habitats over large landscapes throughout the state."*

Despite being a Key Conservation Issue, the Oregon Conservation Strategy and its Goals, are not mentioned in IPC's Application at all! Consider Land Use Planning Goal 1: *Manage land use changes to conserve farm, forest, and range lands, open spaces, natural or scenic recreation areas, and fish and wildlife habitats.* Neither the current Proposed Route nor Morgan Lake Alternative of IPC's Application to EFSC takes these into account! Even if we ignore the fact that the B2H Project likely is not needed at all, given lowered demand and improved technology of energy storage batteries—IPC intends to disregard the "Proposed Route" considered in the BLM/USFS Records of Decision. That "Proposed Route" was chosen by the agencies as being the least harmful to the greatest list of resources—yet IPC has abandoned that in favor of two other routes imminently MORE harmful and despised by MOST residents of Union County. Is Goal 1 being met when the B2H line goes less than 100 feet from Twin Lake, a gem of a wetland that deserves protection? Is Goal 1 being met when B2H goes through Rice Glass Hill property, proposed as a State Natural Area? Is Goal 1 being met when noxious weeds are spread by B2H through Union County's finest wet meadows and elk wintering habitat?

No, Goal 1 one is not being met. Another very specific example is 5 State listed rare plant species (DPO Exhibit Q) within the B2H "analysis area". IPC claims "only" two of these rare species (Mulford's milkvetch and Snake River goldenweed) will suffer "direct impacts", by blading with heavy equipment. IPC claims that, "Avoidance and minimization measures ...described in Section 3.5.4" will "mitigate" impacts. Upon reading 3.5.4 we find that this consists of "minimum buffer of 33 feet between the disturbance and the edge of the T&E occurrence". Habitat for these plants will be completely fragmented and a buffer of 33 – or even a few hundred--feet will not stop invasion by noxious weeds! These species will suffer irreparable damage under B2H. The Oregon Conservation Strategy rightly recognizes, "Invasive species are the second-largest contributing factor causing native species to become at-risk of extinction in the United States."

To delve further into rare plants slated for damage by B2H, *Trifolium douglasii* is a USFWS "Species of Concern" <https://www.fws.gov/oregonfwo/Documents/OregonSpeciesStateList.pdf> yet not even considered in IPC's 3.5 "Avoidance to Minimize Impacts". Although List 1 under ORBIC's latest ranking <https://inr.oregonstate.edu/orbic/rare-species/ranking-documentation/vascular-plant-ranks> it is not shown as State listed Threatened or Endangered, so is

ignored by IPC. Species of Concern are "Taxa whose conservation status is of concern to the U.S. Fish and Wildlife Service (many previously known as Category 2 candidates), but for which further information is still needed." Douglas clover has a global rank of G2 "*Imperiled because of rarity or because other factors demonstrably make it very vulnerable to extinction (extirpation), typically with 6-20 occurrences*". DPO Exhibit P Part 2b Appendix 3A and 3B Figure 9 of 23 shows Douglas clover directly on the Morgan Lake alternative! This is not even taking into account that areas of private land where access was not granted for survey, likely contain additional occurrences of Douglas clover. The area is THE main place where this rare plant grows in Oregon, and B2H is set to permanently alter and compromise its main habitat with weeds!

Another very obvious lack is IPC's failure to discuss Strategy Habitats, outlined in Oregon's Conservation Strategy: <http://oregonconservationstrategy.org/strategy-habitats/strategy-habitats-summary-by-ecoregion/>. In Union County alone, the Strategy Habitats of Grasslands, Late Successional Mixed Conifer Forest, and Ponderosa Pine Woodlands would very obviously be impacted by B2H as proposed in the Application.

The Application also neglects to address Strategy Species under OCS "*The Conservation Strategy identifies 294 Strategy Species, which are Oregon's "Species of Greatest Conservation Need". Strategy Species are defined as having small or declining populations, are at-risk, and/or are of management concern.*" This is completely unacceptable! How can an action set to devastate so many of Northeast Oregon's Strategy Habitats and Species not even respond to our State Conservation Strategy?

Moving on to invasives, IPC's "Noxious Weed Plan" is greatly lacking. As noted above, it is a threat to Oregon's native plant communities. Oregon's Conservation Strategy states "*Invasive non-native species can have many negative consequences throughout Oregon. Depending on the species and location, invasive plants can:*

- *affect food chain dynamics*
- *change habitat composition*
- *increase wildfire risk*
- *reduce productivity of commercial forestlands, farmlands, and rangelands*
- *modify soil chemistry*
- *accelerate soil erosion*
- *reduce water quality"*

Chapter 569 of Oregon law covers weeds. Oregon statute 569.180 (Noxious weeds as public nuisance policy) states, "In recognition of the imminent and continuous threat to natural resources...noxious weeds are declared to be a public nuisance and shall be detected, controlled and, where feasible, eradicated on all lands in this state."

Upon careful reading, "Noxious Weed Plan" breaks the law by exempting IPC from weed control after 5 years, denying responsibility for Class B and C Weed species (the vast majority of weeds), and holding IPC accountable for only the very limited area of ROW, despite the B2H project introducing and spreading weeds far and wide along a 300 mile stretch plus dozens of additional access roads and tensioning areas.

In summary, IPC's Application does not take into account the Oregon Conservation Strategy. The Application clearly is breaks Goal 1 of the Strategy in many ways; additionally the Application imperils a Federal "Species of Concern", and does not consider Strategy Habitats or Strategy Species. IPC's Noxious Weed Plan does not comply with Chapter 569 of Oregon law. I strongly urge you to deny IPC's Application. Our State Conservation Strategy and Goals and the integrity of our native plant habitats and rare plant occurrences cannot be sacrificed!

Sincerely,

Jordan Brown
1440 SE Vica Way
Corvallis, OR 97333

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_ * _ O _
_ * ^ _ * Jordan Brown
_ '/\` _ jordanisbrown@gmail.com
_ '///!\` _ (253)-820-3934
*_ '///!\` _
_ !! _

TARDAEWETHER Kellen * ODOE

From: SA Brown <sabocta@gmail.com>
Sent: Tuesday, July 9, 2019 12:05 PM
To: B2H DPOComments * ODOE
Subject: B2H Draft Proposed Order

July 09, 2019

Kellen Tardaewether
Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR 97301

VIA E-MAIL: B2H DRAFT PROJECT ORDER

To: Members of the Energy Facility Siting Council

Thank you for the opportunity to comment on the B2H Draft Proposed Order.

Overall, I would want the B2H project to be stopped. I am sure that you heard this very clearly from many people during the recent public meetings held in eastern Oregon.

That said, my specific concerns are for the Oregon National Historic Trail, which the proposed B2H Transmission Line will cross in 17 locations. (page S-176).

This trail is part of a nation-wide, congressionally-designated system known as the National Trails System. On this trail are several federally built and managed visitor/interpretive centers, including one in Baker City, Oregon – the National Historic Oregon Trail Interpretive Center (NHOTIC). The name itself conveys the significance of the historic resource to the American people. From this center, visitors from around the world can learn about the trail's heritage and see pristine trail ruts in situ.

When the NHOTIC opened in 1992, its position on Flagstaff Hill offered visitors a sweeping view of the landscape emigrants passed through 175 years ago. The center's wall of windows purposely supported a desired visitor experience.

The Draft Proposed Order offers impact analysis at the NHOTIC site in Exhibit S: Historic, Cultural, and Archeological Resources. On Table 4.1. "Project Effects to Aboveground Resources" on page 20 of the Historic Properties Management Plan, several Oregon Trail segments, including the Oregon Trail ACEC (Areas of Critical Environmental Concern, Bureau of Land Management designation) (site B2H-BA-282), will experience "Potential Adverse Effect" as a result of this project. Table 4.2 "Project Impacts to Oregon Trail Resources" on pp. 20-21 identifies eight trail resources, including the Flagstaff Hill component, that have the potential to be adversely affected by this project.

The Draft Proposed Order also offers impact analysis at the NHOTIC site in Exhibit R: Scenic Aesthetic Values. On page R-81 is the following statement:

“In evaluating various alternatives for Project siting, IPC concluded that potentially significant visual impacts from facility structures in the vicinity of the NHOTIC could result.”

The strategy for mitigating these potentially significant visual impacts involves using shorter towers finished in weathered steel.

This is not acceptable. Do not allow the Idaho Power Company to destroy or even diminish this nationally significant cultural resource and historic and scenic view that support our understanding of the overland emigrant experience by installing a high power transmission line in front of the NHOTIC.

Instead of trying to mitigate impact by lowering and painting the towers, the Idaho Power Company should further investigate burying the power lines in the vicinity of the NHOTIC. The company should not dismiss this action by saying the cost would be too high.

What is the cost, not only to Oregonians, but to the thousands of national and international visitors who come to the NHOTIC each year and stand in front of those huge picture windows – only to see a diminished, or even destroyed, scenic and cultural view of the overland emigrant trail heritage? Too many people have fought over the years to protect what little remains on the ground of this nationally significant resource – the Oregon National Historic Trail. Once destroyed or trampled, the trail’s resource integrity can not be restored.

Thank you for your consideration of my comments on the EFSC B2H Draft Project Order.

Sincerely

Sharon Brown
Western Region Representative
Oregon-California Trails Association
1221 SW 10th Ave, #318
Portland, OR 97205



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory)

Ryan Browne

Mailing Address (mandatory)

[Redacted]

*
] please
redact
address
*

Phone Number (optional)

(541) 519-6942

Email Address (optional)

browner@eou.edu

Today's Date:

6/20/19

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

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Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

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1 In fact, the vegetation literally needs to burn to
2 regenerate.
3 "The line will be an economic burden, enabled
4 by an out-of-date business model with increasing risk
5 and decreasing financial viability. An economist and
6 ex-president of the 'Society for Risk Analysis'" -- some
7 of these actually brought in by utilities -- "had this
8 to say about billion dollar investments such as this
9 one:
10 "If you were silly enough to think about
11 investing in transmission, we would tell you that we
12 don't have any idea how you're going to get reimbursed
13 or how much you are going to get reimbursed.
14 "The guaranteed rate-of-return offered up to
15 regulated utilities places that financial burden
16 squarely on the backs of ratepayers, removing money from
17 their pockets and" -- it takes it right out of the local
18 economies. That is what funding this thing will do, in
19 my opinion, because it's going to be obsolete long
20 before that 50-year financing lifespan. This provides
21 context for what I will be writing up.
22 So you have a very difficult decision in front
23 of you. These paradigm shifts are difficult, I will not
24 kid you, but that's exactly what's going on, and we are
25 starting to see it now accelerate.

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1 We had a congressman from Idaho just propose
2 that all the dams in the Snake River be taken down. The
3 BPA -- I'm on the Grande Ronde Model Watershed Board,
4 and I'm not speaking for them. BPA approached us and
5 told us that they expect that in the next cycle of
6 planning for the power distribution to the co-ops and
7 PUDs, we had them tell us quite clearly they expect a
8 lot of them are going to walk out the door. That's
9 because the power is getting cheaper from renewables.
10 What's going to happen then is the cycle where
11 the people who are -- organizations, utilities that are
12 left on the grid, the BPA grid, will simply be charged
13 more, which means more of them will walk out, which
14 means the others will be charged more. That kind of
15 vicious cycle can just blow organizations apart.
16 So there is great concern amongst the
17 congressional delegations and also amongst the power
18 plants in the Northwest.
19 Thank you very much and good luck with your
20 decision. It's a tough one.
21 HEARING OFFICER WEBSTER: Thank you.
22 MR. RYAN BROWN: My name is Ryan Brown. I'm a
23 resident of La Grande, and I represent seven generations
24 of the Webster property, which looking west from
25 La Grande is the horizon that you see.

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1 If you could imagine for a brief moment an 8th
2 grade me, getting dropped off near Table Mountain and
3 walking the Oregon Trail from Table Mountain to Hilgard
4 State Park. A popular kid, I guess, too good for
5 walking the Oregon Trail. I didn't listen, didn't pay
6 much attention.
7 Fast forward, and unbeknownst to me, I married
8 a gal that is a granddaughter of the person that owns
9 the trail I walked or the property in which the Oregon
10 Trail sits. So now I'm here today.
11 So as a person who helps out, caretake for
12 this property, my wife and I, we became aware of the B2H
13 power line about, around 2015, give or take.
14 Fast forward a little ways, we ended up having
15 a meeting with some gentlemen in the back of the room
16 here from Idaho Power. I asked the question of why is
17 it that we are just now being made aware of this when
18 it's been in the works for some time. And basically
19 they didn't have an answer for it.
20 Well, unbeknownst to these guys, I was aware
21 of a lot of the reasons why, and the reason why is
22 money. If we can't talk about the Glass Hill route,
23 apparently it's taboo, but it run into a lot of
24 litigation, I get it.
25 So I know we can't take that into account, but

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1 I was told that the comment period for the proposed
2 route and the alternative route had passed. Well, the
3 comment period for that was before we ever received the
4 letter.
5 So my question to the gentlemen in the back
6 was: What happens if the poles that go in devastate the
7 property so much that we lose our water? There are
8 three springs on the property, all of which are within
9 200 or less feet of proposed towers. If we lose those
10 three springs, our property is no longer workable.
11 When I asked them this question, and much like
12 in the ORS, the burden is on us as landowners. We have
13 to prove by paying somebody, we aren't going to do it
14 ourselves, but paying somebody professional to calculate
15 the flow of water and present what damage has been done.
16 Does that make any sense? After it's gone in we have to
17 prove. Is that backwards? Guilty until proven innocent
18 in our society; right?
19 So fast forward a little bit more, we allowed
20 surveyors from Idaho Power, contracted surveyors, and
21 they walked right over the Oregon Trail; they didn't
22 even know it existed.
23 I encourage you to listen to these people. We
24 are not attorneys, we are not going to comb through
25 thousands of papers. We don't have the time, it's

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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 Tweet.
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,

August 10, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Soil Protection - **Drill site 95/3; 95/4 on unstable and steep slopes**

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground.

The applicable standard is: OAR 345-022-0022. (c) *...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3; 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 95/3 and 95/4** is shown and described on the following tables and maps:

Exhibit H – Attachment H-1 Appendix B Soils Data Tables and Maps by Shannon & Wilson, Inc.:
Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. Sheet 3 of 4

Exhibit H – Appendix C: Summary of Proposed Boring Locations:

Map Sheet 36 - Drill site 95/3 and 95/4

Exhibit H – Table C1: Summary of Proposed Borings – Sheet 2 of 8

95/3 – cited for Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 – cited for Angle change along alignment; Road and railroad crossing

Exhibit H - Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5,6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states *“The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.”*

Idaho Power Corporation admits in ASC page B-12 that *“The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes presenting design and construction challenges.”*

IPCs stated original intention to the EFSC was the following: *“Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.”*

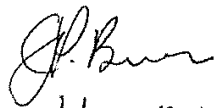
Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the Winter storms and the Spring melt can be precipitous and unpredictable.

The area surrounding **Drill sites 95/3; 95/4** is within a mile of the heavily traveled I84 transportation/utility corridor. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily “aggravate” the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site Drill sites 95/3; 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area characterized by steep slopes and hazardous snow melts should be removed for consideration as a site for a transmission “facility”. Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.



Homeowner
Property Owner

808 Main Ave, La Grande, OR, 97850
Union County Airport, OR, 97850

References:

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Transmission Line Project: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

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Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; *Soil Protection* Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project:* Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) GAIL CARBIENER

Mailing Address (mandatory) 2920 NE Commons Ave. Bend, OR

Phone Number (optional) 541 312-1461 Email Address (optional) _____

Today's Date: 6/19/19

Do you wish to make oral public testimony at this Hearing: Yes 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
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Email: B2H.DPOComments@oregon.gov

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Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)



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Name (mandatory) GAIL CARBIENER

Mailing Address (mandatory) 2920 NE Connors Ave. Bend, OR

Phone Number (optional) (541) 312-1451 Email Address (optional) _____

Today's Date: 6/20/19

Do you wish to make oral public testimony at this Hearing: Yes No

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Written Testimony
(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

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1 is the entrance, and they've talked about it a little
2 bit previously, where you come in off of Sunset onto
3 Modelaire and it splits to Hawthorne and Modelaire.
4 There is no sidewalks. It's the only entrance into the
5 place. There is a lot of bike traffic, a lot of kid
6 traffic, a lot of walking, people just walking up and
7 down that hill. And it's a potential hazard, big time.
8 Idaho Power has been very deceptive, and I've
9 had almost no contact with them whatsoever. I don't
10 know what to expect. All the information I'm getting is
11 just really meetings, and yet I'm going to have to sit
12 there. And it's getting close enough I'll hear the
13 buzzing. I'll see two towers. I see people walk up the
14 Oregon Trail all the time, and they'll have to sit there
15 and look at these huge towers as they are walking. It's
16 beautiful up through that little piece of property up
17 there.
18 I just found out about the blasting, which I
19 have a 565-foot well we put in when we did the house.
20 They are going to have to do some blasting there because
21 it's solid rock.
22 So it's just a potential hazard all the way
23 around, as far as -- I'm not going to gain -- I will
24 have no gain. Looking at these things, I'll have to
25 listen to them, and I don't gain anything from them. So

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1 I don't think it's -- I'm not really sure how they can
2 actually come and do that.
3 So anyway, so that was the third time I was
4 contacted was in 2017. Then I was actually -- somewhere
5 around the end of 2017, a gentleman with Idaho Power, I
6 believe his name was Jeff Maffuccio, or something like
7 that, came up to the property. We discussed a few
8 things. I voiced my concerns one more time with him.
9 Then we discussed -- we discussed about maybe put a road
10 in a different spot, the one up there. But I don't know
11 who is going to -- as far as I can tell, they will just
12 come in and just use the one in front of my house, and
13 there's nothing I can do about it.
14 I also live in the area, and a couple of
15 people have mentioned, about the '73 fire actually
16 burned where my house sits, right across that property.
17 So that's another concern of mine as well.
18 I don't think there has been any environmental
19 impact statement done on that particular route right
20 there either. They said something about there was one
21 done somewhere nearby, but I'm not sure how close that
22 was or anything.
23 But I'm just going to ask that you guys take
24 us into consideration. We have to live and deal with
25 this and with no gain on it. Especially from my

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1 perspective up there, like I said, Idaho Power has
2 contacted me a total of four times, and I really don't
3 know about what is going on or anything. I think they
4 should be a little more inclusive to people who are
5 going to be impacted by this.
6 So I want to thank you guys for listening, and
7 take some of these things into serious consideration in
8 making your decision.
9 Thank you very much.
10 HEARING OFFICER WEBSTER: Thank you.
11 MR. GAIL CARBIENER: I'm Gail Carbiener. I'm
12 from Bend, Oregon, but behind me are lots and lots of
13 friends. It's almost as if I live in this county I'm
14 over here so frequently. I represent the Oregon Trail.
15 That is a national organization whose job it is to do
16 what we can to protect and preserve the trail as well as
17 educate the public. I'm proud to say that our national
18 organization is a member of Stop B2H and has donated a
19 substantial amount of money to their effort to Stop B2H.
20 On Exhibit S, Historic Properties Management
21 Plan, at 7.2.3, which is the field crew definition, I
22 would like to add an expert from the Oregon Trail's
23 Association to be a member. There is many, many
24 instances in the documents presented for the Oregon
25 Trail where the Oregon Trail is misrepresented,

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1 sometimes not even on the maps and, therefore, you need
2 an expert, and there is none on that field crew. You
3 have got my specific recommendations in writing.
4 Also, I'm glad to hear that Kellen led off
5 tonight with information about fire. Last night she did
6 not. And I mentioned that Idaho Power's fire prevention
7 plan is not only weak, it is less specific than I think
8 you are requiring us to be. For example, Idaho Power
9 last night responded to the chairman's question about
10 have they submitted a draft fire prevention plan, and he
11 said that it will be submitted. That is my
12 recollection.
13 They not only submitted a draft fire
14 prevention plan, but it was forwarded to the Forest
15 Service and to the State Forestry fire prevention and
16 corrections, and suggestions were submitted. However,
17 in the draft project order, the fire prevention plan has
18 not changed. I suggest that they do that.
19 I recommended a couple of things in the fire
20 prevention plan: (1) cameras could be posted to cover
21 the area of the power line if, in fact, it is to be
22 built; (2) Idaho Power recommends that a watch person,
23 an individual watch person be present to report fires
24 during construction. My recommendation is that Idaho
25 Power provide a crew with a wildfire engine, Category 3,

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1 which is used by most of the wildfire prevention
2 districts, to be present during construction at all
3 times, including after hours when the vehicles and
4 equipment are being serviced.
5 Last, but not least, the vegetation management
6 plan that is presented by Idaho Power is a copy of
7 PacifiCorp's vegetation management plan. They did not
8 even take off PacifiCorp's logo. How insulting can that
9 be?
10 So I hope that you will hear the people here
11 tonight, and that you will turn down and reject the
12 current B2H.
13 Thank you.
14 HEARING OFFICER WEBSTER: Thank you.
15 Let's take a break. Let's come back at 6:40,
16 and then we will then be calling Irene Gilbert to
17 testify followed by John Williams.
18 Thank you all.
19 (Recess taken.)
20 HEARING OFFICER WEBSTER: We are back on the
21 record. We are going to be hearing from Irene Gilbert,
22 and following Irene we will be hearing from John
23 Williams.
24 SECRETARY CORNETT: Before we begin, I'd like
25 to make a quick announcement. For those of you who will

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1 come in a little bit later -- Max, can you raise your
2 hand back there? Max. Cliff, in the red shirt, if
3 anybody has come in late, we have comment cards. If you
4 would like to make a comment, please fill out a card.
5 Max is holding them up right now. Go back and talk to
6 him. You can fill them out and then he'll bring them up
7 to us. Thank you.
8 HEARING OFFICER WEBSTER: Also, if there is
9 anybody that is on the phone that would like to give a
10 comment telephonically, please speak up now so we can
11 accommodate you. We are going to put the phone callers
12 in at the end of the in-person testimony, but we need to
13 know if anybody is on the line so we can have time for
14 you. Hearing none, we will proceed and time it as if
15 there is nobody on the phone that wants to participate.
16 So, Ms. Gilbert, thank you.
17 MS. IRENE GILBERT: My name is Irene Gilbert.
18 I live at 2310 Adams Avenue here in La Grande. I come
19 representing myself. I'm also the legal research
20 analyst for Friends of the Grande Ronde Valley and a
21 member of the board for Stop B2H.
22 I want to make a few just really quick
23 comments before I get into the main part of my
24 presentation. But this is some of the concerns that I
25 have: The Oregon Department of Energy does not

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1 recognize or honor the federal protections for
2 threatened and endangered species; in fact, it removed
3 them from their rules. I asked Representative Greg
4 Smith to get a response from Oregon legal Council about
5 whether or not that was legitimate or legal. And the
6 response that he got was, Well, they can get away with
7 it if -- and this was a written response -- as long as
8 they include all those animals in their habitat section
9 of the evaluation.
10 They do not cover all of the threatened and
11 endangered or federally protected species; and, in fact,
12 it says that pretty much if they run into them, sort of
13 as an aside, they will note it. So I think that's a
14 problem.
15 I think that when you read through these site
16 certificates, there is a lot of use of language to
17 misdirect people. And in the thousands of pages of
18 information they provide they say things like: There
19 will be no direct impacts on things like the Oregon
20 Trail. That means they won't put a tower right in the
21 middle of the trail.
22 They have done other things, like with Ladd
23 Marsh, they rated it on a 30-point scale, they rated the
24 views from Ladd Marsh and rated it an 11. So I would
25 say that is a long ways from 30. And when they say they

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1 are protecting raptor nests, that means they won't cut
2 one down as long as there are young in the nest; but if
3 the young are not there, they will cut it down and put a
4 tower right next to it.
5 So those are the kind of individual things
6 that I hope people are looking at and commenting on. I
7 could give you 50 others.
8 Anyway, you previously heard from me in some
9 level of detail about noise and weeds resulting from
10 this development. I'd like you to keep in mind that the
11 recommendations from the Oregon Department of Energy in
12 the draft proposed order only give information in
13 support of their recommendation.
14 So I hope that you thoroughly consider the
15 comments and the written comments that you will receive
16 from the rest of the community here.
17 One thing that happened is Idaho Power chose
18 to identify the minimum amount of land that they
19 possibly could as a part of their site. So what that
20 means is things like to notice those people who are
21 impacted that they have to notify people with 250 feet
22 of it, they really limited the amount of people who got
23 to know that this was happening. They also then got to
24 minimize the damages from things like farm and
25 forestland impacts. They didn't have to do surveys in a



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) GAIL CARBIENER

Mailing Address (mandatory) 2920 NE Commons Ave. Bend, OR

Phone Number (optional) 541 312-1461 Email Address (optional) _____

Today's Date: 6/19/19

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Page 46	<p>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</p>	Page 48	<p>1 on with the Interpretive Center, which is a beautiful 2 museum -- and if you people are not from here, I would 3 highly recommend you going there. It is so inspiring. 4 I cry every time I go. This bump is the Interpretive 5 Center. So this is looking east. The Interpretive 6 Center looks west, which is the towers are going to come 7 up, supposedly not be able to be seen, under the 8 Interpretive Center. 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</p>
Page 47	<p>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</p>	Page 49	<p>1 experienced disturbance. And everyone claims ignorance, 2 Oh, we didn't mean to do that. Well, we didn't think, 3 and so forth. But it happens, and we are the ones that 4 bear that burden. 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</p>

<p style="text-align: right;">Page 50</p> <p>1 before. 2 Tonight I'm speaking a couple of times to the 3 people behind me. Because if you read the literature 4 that Idaho Power has provided in the fire prevention 5 area, it's as if the California fires never existed. 6 They have a sentence in there that says: "In operation, 7 the B2H line will not significantly increase fire 8 potential." 9 Now, the State of California, and the day 10 before yesterday the State of Nevada, have legislated 11 that their utility companies prepare a detailed fire 12 prevention plan. I have sent to the Chairman my letter 13 with details on what I think Idaho Power should do. 14 The other thing that I would like to talk to 15 the people sitting behind me, is in reclamation. Idaho 16 Power says that the power line will be active in 17 perpetuity; that means forever. They provide no data, 18 no references. 500-kilovolt power lines in the state of 19 Oregon have begun in the 1980s. That's not a hundred 20 years. 21 What's more, in reclamation, they say because 22 it's going to be forever, they're shifting the risk of 23 reclaiming the land to the public for the first 24 50 years, because they're not going to bond reclamation 25 after and during from the time that it's in operation</p>	<p style="text-align: right;">Page 52</p> <p>1 that's working for Idaho Power, in the burying of a 2 power line in Hailey-Sun Valley, Oregon [sic], that 3 they're having difficulty with because of scenic views. 4 POWER Engineering says this 1 1/2 miles here at the toe 5 of the foothill, sagebrush off irrigated land will cost 6 \$111 million. 7 If it's just a straight line, it doesn't cost 8 that much. In reality, they have not had a foot on the 9 ground that they have documented. They've not turned 10 over a shovel of dirt in front of that Interpretive 11 Center that they've documented. I've documented the 12 Chino Hills, and I've talked with those people. And 13 they say it's probably 50,000, but that's their guess -- 14 50 million, excuse me. 15 You will receive other letters from me rather 16 than speaking this last 4 minutes, but I would certainly 17 hope that you would seriously consider the 18 undergrounding. POWER Engineering in their estimate 19 states that they are a Level 5 estimate, based on their 20 civil engineering standards. They have given the 21 definition of a Level 5 as ratio, ballpark, blue sky, 22 seat of the pants, idea study, prospect, estimate, 23 concession, license, or guesstimate. That's their 24 definitions. You've got to do better. 25 Thank you very much.</p>
<p style="text-align: right;">Page 51</p> <p>1 until the first 50 years. Now, that's like not insuring 2 a new home because you don't think it's going to burn 3 down until it gets old. 4 They don't provide any data. Hard data. And 5 what's more -- I'm looking at Todd -- what's more, it 6 concerns me that the EFSC can approve without requiring 7 more detail. 8 Now, in the last 7 minutes, I have sent you 9 this letter as well, and again, I'm talking to the 10 people behind me, wearing my Oregon Trail cap. Exhibit 11 BB, section 3.4.2, the conclusion regarding 12 undergrounding the power line. Idaho Power continues to 13 says it's too expensive. I have sent to Mr. Beyeler, 14 the Chairman, and I don't know how far my letters go, 15 pictures of a comparison of 3.7 miles down in Chino 16 Hills, California, of a 500-kilovolt power line that was 17 put underground for 3.7 miles. Almost every foot of 18 that ditch had a infrastructure under the ground. That 19 cost \$224 million. 20 I've recommended, as I hope people in the 21 audience have, that the line be put underground in front 22 of the Interpretive Center. 23 For illustration purposes, Idaho Power has 24 used 1 1/2 miles and asked POWER Engineering, one of the 25 consultants, it's a good firm, but it's a consultant</p>	<p style="text-align: right;">Page 53</p> <p>1 HEARING OFFICER WEBSTER: Thank you. 2 After we hear from Mr. Kaaen, we will hear 3 from Bruce Owen. And if anybody else that has not yet, 4 that wants to be heard tonight, if you have not 5 completed a comment form, please do so and provide it to 6 staff. I think we will, after Mr. Owen, we've run out 7 of comments, people who want to comment at this point, 8 so we will take a break after that. And if anybody else 9 wants to be heard, we'll reconvene and hear from you. 10 UNIDENTIFIED SPEAKER: Can we have it quieter 11 in here? It's really noisy in the back. Can you 12 address the noise in the back of the room, please. 13 HEARING OFFICER WEBSTER: Well, I know that we 14 do have some people coming in to get their tacos and -- 15 UNIDENTIFIED SPEAKER: It's really hard to 16 hear. 17 HEARING OFFICER WEBSTER: Is it? 18 UNIDENTIFIED SPEAKER: Yes, it is. 19 HEARING OFFICER WEBSTER: I'm sorry about 20 that. And when you speak, if you'll speak into the 21 microphone. 22 MR. WAYNE KAAEN: Certainly. 23 My name is Wayne Kaaen. I'm from Halfway, 24 Oregon. Post Office Box 402, Halfway. I have property 25 which B2H is impacting. Obviously that's why I'm here.</p>

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, July 3, 2019 4:53 PM
To: B2H DPOComments * ODOE
Subject: Response
Attachments: B2H - EFSC letter 9 Ore Trail.docx

Kellen:

Here is my response to the DPO. Please notice the Baker City-Baker County wastewater facility in the same area as B2H. Also notice there is a class 1 trail segment that has not been identified, to my knowledge, on maps or in the text where B2H crosses. Noise study does not include the Trail, especially near the Flagstaff Hill area.

best
Gail Carbiener

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR 97301

July 3, 2019

Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR 97701-7927

VIA E-MAIL: B2H DRAFT PROJECT ORDER

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. I represent the *Oregon-California Trails Association (OCTA)*, whose mission is to protect and preserve the emigrant trails. The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line.

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C: Property Location and Maps; Exhibit L: Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T: Recreational Facilities; and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times. EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating that undergrounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined that IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refused to approve the Draft Project Order for the following reasons:

- 1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.**
- 2. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic vales. IPC says no significant impact.**

3. **The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44° 48' 48.26"N 117° 75' 57.97"W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.**
4. **The DPO does not meet the standards required for Exhibit T Recreational Facilities, especially at the Flagstaff Hill interpretive center, because of:**
 - a. **It is a BLM ACEC area managed for public tourism**
 - b. **It is the single most visited tourist facility in Baker County**
 - c. **The quality of the facility is outstanding**
 - d. **There is no other place where the Oregon Trail can be seen and interpreted.**
5. **The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.**
6. **The Baker City-County plans to construct a treated wastewater storage lagoon, irrigation site and effluent transmission pipeline in the same location as the B2H to the west of the Interpretive Center. Neither has referenced the other, certainly EFSC must determine affect upon the B2H.**

In summary, the Oregon Trail along the route of the B2H has the most damaging affects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. Once gone, always gone. The only easily accessible public facility in Oregon, is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Gail Carbiener



A handwritten signature in cursive script, reading "Gail Carbiener", is enclosed within a rectangular box. The signature is written in black ink on a white background.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, May 22, 2019 4:35 PM
To: TARDAEWETHER Kellen * ODOE
Subject: B2H

Hi Kellen:

My eyes are tired, but I have a glass of wine.
Look at -PA-02, you may mean Morgan Lake not Ladd Marsh.

good job, but lots of data.
gail

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Saturday, May 25, 2019 5:05 PM
To: B2H DPOComments * ODOE
Subject: DPO Comments
Attachments: B2H - EFSC letter 1.docx

Kellen Tardaewether:

Attached are my comments for B2H.

Sincerely
Gail Carbiener

May 26, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment and object.

I object to the **“Conclusion Regarding Undergrounding of the Project”** at Exhibit BB, Section 3.4.2 reached by Idaho Power and supported by Staff.

The text at page BB-7 states in part: *“because of the high cost of an underground line compared to overhead 500-kV lines, unproven technology over long distances for 500-kV, reliability and reactive compensation issues for long installations, and increased land disturbance, the alternative of placing the 500-kV line underground was not considered feasible for the Project”* These conflicting points all come from a 2009 National Grid publication that is currently out of date.

Reliability, Reactive Power Compensation and Environmental issues are not significant in a 2.25-mile underground line. The 2009 National Grid publication refers to “long distances and long installations” when describing these three issues. Cost continues to be the major reason for not considering a short underground in front of the Oregon Trail Interpretive Center near Baker City.

Power Engineers, who is the major contractor for Idaho Power’s 138-kV line in Blaine County near Hailey, Idaho, provided estimates of B2H costs. **There is no indication or reference that they have set foot on the ground at the site in Oregon.**

Power Engineers estimate the cost to be \$102 million to \$111 million for the 1.5 miles in front of the Interpretive Center. Using AACE Cost Estimates with a 50% contingency and a Class 5 MATURITY LEVEL OF PROJECT DEFINITION DELIVERABLES, expressed as 0% -2% of complete definition, this is the least confident estimate allowed.¹ The only reference used by Power Engineering was the 3.7 mile, 500-kV underground line in Chino Hills, California constructed by Southern California Edison at a cost of \$224 million.

The Chino Hills project crossed two major thoroughfares, several minor roadways, a shopping center, two flood-control channels and two holes of a golf course. One-third of the alignment was on a 15 percent average grade, with slopes as steep as 35 percent in some locations. In all, the project involved the installation of approximately 17,000 linear feet of duct bank and numerous horizontal drills ranging from 800 to 2,100 feet in length.²

¹ www.aacei.org

² Underground construction magazine 5/7/2017

Compare these two sites:
Below is only 400 feet of the underground 500-kV line in Chino Hills.



Figure 1 Underground Route Segment near the NHOTIC

The 3.7 miles of undergrounding through a major city and its infrastructure cost \$224 million. The 1.80 miles of undergrounding through open land without any obstacles should cost considerably less than a straight proportion of costs. (3.7 = \$224 so 1.80 = \$109) This compares with Power Engineers cost estimate of \$102-\$111.

	<i>Primary Characteristic</i>	<i>Secondary Characteristic</i>		
ESTIMATE CLASS	DEGREE OF PROJECT DEFINITION <small>Expressed as % of complete definition</small>	END USAGE <small>Typical purpose of estimate</small>	METHODOLOGY <small>Typical estimating method</small>	EXPECTED ACCURACY RANGE <small>Typical variation in low and high ranges ^{1a1}</small>
Class 5	0% to 2%	Concept screening	Capacity factored, parametric models, judgment, or analogy	L: -20% to -50% H: +30% to +100%
Class 4	1% to 15%	Study or feasibility	Equipment factored or parametric models	L: -15% to -30% H: +20% to +50%
Class 3	10% to 40%	Budget authorization or control	Semi-detailed unit costs with assembly level line items	L: -10% to -20% H: +10% to +30%
Class 2	30% to 70%	Control or bid/tender	Detailed unit cost with forced detailed take-off	L: -5% to -15% H: +5% to +20%
Class 1	70% to 100%	Check estimate or bid/tender	Detailed unit cost with detailed take-off	L: -3% to -10% H: +3% to +15%

The definitions as presented by AACE show the cost estimates used by Idaho Power as presented by Power Engineers Within Exhibit BB Errata Info, cost estimates may be 50% to high.

CLASS 3 ESTIMATE	
<p>Description: Class 3 estimates are generally prepared to form the basis for budget authorization, appropriation, and/or funding. As such, they typically form the initial control estimate against which all actual costs and resources will be monitored. Typically, engineering is from 10% to 40% complete, and would comprise at a minimum the following: process flow diagrams, utility flow diagrams, preliminary piping and instrument diagrams, plot plan, developed layout drawings, and essentially complete engineered process and utility equipment lists.</p> <p>Degree of Project Definition Required: 10% to 40% of full project definition.</p> <p>End Usage: Class 3 estimates are typically prepared to support full project funding requests, and become the first of the project phase control estimates against which all actual costs and resources will be monitored for variations to the budget. They are used as the project budget until replaced by more detailed estimates. In many owner organizations, a Class 3 estimate is often the last estimate required and could very well form the only basis for cost/schedule control.</p>	<p>Estimating Methods Used: Class 3 estimates generally involve more deterministic estimating methods than stochastic methods. They usually involve a high degree of unit cost line items, although these may be at an assembly level of detail rather than individual components. Factoring and other stochastic methods may be used to estimate less-significant areas of the project.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 3 estimates are -10% to -20% on the low side, and +10% to +30% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Budget, scope, sanction, semi-detailed, authorization, preliminary control, concept study, development, basic engineering phase estimate, target estimate.</p>

CLASS 5 ESTIMATE	
<p>Description: Class 5 estimates are generally prepared based on very limited information, and subsequently have wide accuracy ranges. As such, some companies and organizations have elected to determine that due to the inherent inaccuracies, such estimates cannot be classified in a conventional and systemic manner. Class 5 estimates, due to the requirements of end use, may be prepared within a very limited amount of time and with little effort expended—sometimes requiring less than an hour to prepare. Often, little more than proposed plant type, location, and capacity are known at the time of estimate preparation.</p> <p>Degree of Project Definition Required: 0% to 2% of full project definition.</p> <p>End Usage: Class 5 estimates are prepared for any number of strategic business planning purposes, such as but not limited to market studies, assessment of initial viability, evaluation of alternate schemes, project screening, project location studies, evaluation of resource needs and budgeting, long-range capital planning, etc.</p>	<p>Estimating Methods Used: Class 5 estimates generally use stochastic estimating methods such as cost/capacity curves and factors, scale of operations factors, Lang factors, Hand factors, Chilton factors, Peters-Timmerhaus factors, Guthrie factors, and other parametric and modeling techniques.</p> <p>Expected Accuracy Range: Typical accuracy ranges for Class 5 estimates are -20% to -50% on the low side, and +30% to +100% on the high side, depending on the technological complexity of the project, appropriate reference information, and the inclusion of an appropriate contingency determination. Ranges could exceed those shown in unusual circumstances.</p> <p>Alternate Estimate Names, Terms, Expressions, Synonyms: Ratio, ballpark, blue sky, seat-of-pants, ROM, idea study, prospect estimate, concession license estimate, guesstimate, rule-of-thumb.</p>

The Council should reject the Conclusion Regarding Undergrounding of the Project (3.4.2) and require a Site Certificate Condition as follows:

Prior to Construction

Prior to construction, the certificate holder shall finalize and submit to the department for its approval, an on-the-ground survey to level 3 Degree of Project Definition as illustrated below:³

³ AACE International Cost Estimate Classifications

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, May 29, 2019 12:24 PM
To: B2H DPOComments * ODOE
Subject: DPO Comment
Attachments: B2H - EFSC letter 3 Fire.docx

Kellen:

Please include the attached comments in response to the DPO for B2H.

Gail Carbiener

May 30, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451
mcgcarb@bendbroadband.com

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment.

My comments in this response refer to Public Services Condition 5 (a), specifically the draft Fire Prevention and Suppression Plan as provided in Attachment U-3 and During Operation Public Services Condition 8:

The following comments appear in Attachment U-3 at 1.1 Purpose and 3.1 Operational.

“The risk of fire danger during transmission line construction is related to smoking, refueling activities, operating vehicles and other equipment off roadways, welding activities, and the use of explosive materials and flammable liquids. During operation, the risk of fire is primarily from vehicles and maintenance activities that require welding. Additionally, weather events that affect the transmission line could result in the transmission line igniting a fire.”

It seems to me that Idaho Power and Tetra Tech never researched or consulted officials in any of the California wild fires. Santa Rosa’s Fire Chief, during a forum sponsored by Firehouse which supports first responders, was quoted: “Firefighters responded from 17 states and Australia. 266 Engines, 79 Crews, in addition, over 4,300 law enforcement officers were called in to help with traffic control, evacuations, and other tasks. The California National Guard put 2,300 soldiers on the ground to assist with various tasks.”¹

It is difficult to imagine getting even one-tenth of these resources to Baker City or La Grande. Both of these cities as well as Meacham and Hilgard are at risk. All are in a bowl with winds from the north able to push a fire, downslope through the forest into the city. It is worth noting that the Camp Fire in Paradise was started by the 115-kV Caribou-Palermo transmission line.

¹ Firehouse.com/news - 3/8/2018

Since the Fire Prevention and Suppression Plan is to establish standards and practices to minimize risk of fire ignition and, in the case of fire, provide for immediate suppression, these additional conditions should be included.

Public Services Condition 5: (a.1)

Idaho Power with the concurrence of effected county and city fire districts and the BLM and Forest Service, will develop a “fire-risk map” over the route with a minimum coverage of 20 miles extending from each side from center line of ROW.

Three fire risk zones will be identified using the following definitions:

Zone 1 consists of areas in direct proximity to communities, roads, and utility lines, and represents a direct threat to public safety.

Zone 2 consists of areas where there is an elevated risk for destructive utility-associated wildfires.

Zone 3 consists of all other areas not covered in either Zone 1 or 2.

Public Services Condition 5: (a.2)

In Fire Risk Zone 1, Idaho Power or the Contractor shall provide enhanced fire protection during construction. That will include as a minimum, a 3500 gallon 4x4 water tender, staffed at all times with two personnel. Period includes all times that either the BLM or Forest Service declare fire season for adjoining properties. The tender will remain staffed during construction working hours.

Public Services Condition 5: d.

Prior to energizing the transmission line for operation, Idaho Power will install high-definition cameras that cover Zones 1 and 2. These cameras should be similar to those installed by ALERTWildfire.²

² ALERTWildfire is a consortium of three universities -- The University of Nevada, Reno (UNR), University of California San Diego (UCSD), and the University of Oregon (UO) -- providing access to state-of-the-art Pan-Tilt-Zoom (PTZ) fire cameras and associated tools to help firefighters and first responders: (1) discover/locate/confirm fire ignition, (2) quickly scale fire resources up or down appropriately, (3) monitor fire behavior through containment, (4) during firestorms, help evacuations through enhanced situational awareness, and (5) ensure contained fires are monitored appropriately through their demise.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Thursday, June 6, 2019 7:48 AM
To: B2H DPOComments * ODOE
Subject: response - Fire
Attachments: B2H - EFSC letter 3 Fire.docx

Please accept the attached response to the DPO section on Fire.
Gail Carbiener

June 6, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Connors Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451
mcgcarb@bendbroadband.com

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment.

I do not believe that Exhibit U, Public Services; 2.1 General Standards for Siting Facilities, especially Police and Fire Protection 3.4.6.2 Fire and errata additions, have been met.

The “Fire Prevention and Suppression Plan” dated September 2018 in paragraph 1.1 Purpose states: “The risk of fire danger during transmission line construction is related to smoking, refueling activities, operating vehicles and other equipment off roadways, welding activities, and the use of explosive materials and flammable liquids. During operation, the risk of fire is primarily from vehicles and maintenance activities that require welding. Additionally, weather events that affect the transmission line could result in the transmission line igniting a fire.”

This Fire Plan is weak, reactive and lacks adequate prevention. Idaho Power does not describe the significance of a 500-kV line compared to other high voltage lines for potential fires. The Fire Plan obviously is the least costly attempt at compliance.

It seems to me that Idaho Power has never researched or consulted officials in any of the California wild fires. Santa Rosa’s Fire Chief was quoted: “Firefighters responded from 17 states and Australia. 266 Engines, 79 Crews, in addition, over 4,300 law enforcement officers were called in to help with traffic control, evacuations, and other tasks. The California National Guard put 2,300 soldiers on the ground to assist with various tasks.”¹

It is difficult to imagine getting even one-tenth of these resources to Baker City or La Grande. Both of these cities as well as Meacham and Hilgard are at risk. All are in a bowl with winds from the north able to push a fire, downslope through the forest into the city. It is worth noting that the Camp Fire in Paradise was started by the 115-kV Caribou-Palermo transmission line.

¹ Firehouse.com/news - 3/8/2018

The Fire Prevention and Suppression Plan is inadequate to minimize risk of fire ignition and, in the case of fire, provide for immediate suppression. These additional conditions should be included.

Additional Condition #1:

FIRE PREVENTION MEASURES 2.0

2.0.5 Equipment:

Idaho Power or the Contractor during construction, shall provide enhanced fire protection. This will include a four-wheel drive fire engine that is designed for rapid deployment. For example, a “Type 3 fire engine” which typically includes a pump operating at 120 gpm, a large 500 gal/tank, 1000 ft. 1 1/2” hose. A minimum crew of two will be present during all hours of construction, including equipment servicing and maintenance.

[This replaces the “Watchman” which is totally inadequate fire prevention and protection]

Additional Condition #2:

2.0 Restricted Operations:

The Contractor and IPC will restrict or cease operations in specified locations during periods of high fire danger at the direction of the land-management agency’s closure order. Restrictions may vary from stopping certain operations at a given time to stopping all operations. IPC may obtain approval to continue some or all operations if acceptable precautions are implemented.

[add] IPC will notify fire agencies responsible for work locations, when approval is obtained from land-management agencies.

OPERATION AND MAINTENANCE 3.0

IPC states at 3.1; “During transmission line operation, the risk of fire danger is minimal. The primary causes of fire on the ROW result from unauthorized entry by individuals for recreational purposes and from fires started outside the ROW.”

Pacific Gas & Electric’s statistics on wildfire causes from 2015-2017² show:

Vegetation (49%) Tree, tree limb, or other vegetation contact with conductors that result in fire ignition.

Equipment Failure – Conductor/Hardware (28%) Failure of conductor resulting in wire down and fire ignition.

Third-Party Contact (13%) Contact caused by a third party, leading to fire ignition, such as cars hitting poles and Mylar balloon contacts.

Animal (8%) Animal contacts that result in fire ignition, such as birds contacting energized conductors then falling to the ground and causing an ignition.

Unknown (2%) Situations where PG&E was unable to determine the cause of the ignition.

The majority of fires will start and burn for some time before being discovered and reported.

Three additional preventive conditions are recommended. Condition #5 is particularly important because IPC is not near or has quick access to the transmission line.

² PG&E amended Wildfire Safety Plan

Additional Condition #3:

Wildfire evacuation plan:

IPC should partner with willing counties and cities and a traffic and evacuation expert, to determine anticipated traffic conditions and evacuation times and recommend strategies that could be used.

Additional Condition #4:

Camera Deployment

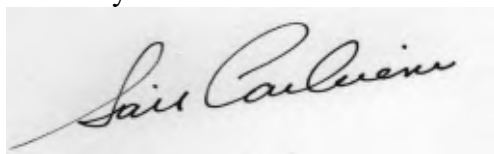
Prior to energizing the transmission line for operation, Idaho Power will install high-definition cameras that cover fire-threat areas where there is an extreme risk (including likelihood and potential impacts on people and property). Areas to be covered by cameras will be determined by IPC and appropriate fire-control authorities. These cameras should be similar to those installed by ALERTWildfire.³

Additional Condition #5:

When the following weather conditions are predicted, IPC will send a qualified crew to predetermined sites to determine if the line should be turned off.

- **A Red Flag Warning declared by the National Weather Service**
- **Humidity levels predicted below 20%**
- **Forecasted sustained winds predicted above 25 mph and wind gusts in excess of 45 mph**

Sincerely



Gail Carbiener

³ ALERTWildfire is a consortium of three universities -- The University of Nevada, Reno (UNR), University of California San Diego (UCSD), and the University of Oregon (UO) -- providing access to state-of-the-art Pan-Tilt-Zoom (PTZ) fire cameras and associated tools to help firefighters and first responders: (1) discover/locate/confirm fire ignition, (2) quickly scale fire resources up or down appropriately, (3) monitor fire behavior through containment, (4) during firestorms, help evacuations through enhanced situational awareness, and (5) ensure contained fires are monitored appropriately through their demise.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Saturday, June 8, 2019 11:50 AM
To: B2H DPOComments * ODOE
Subject: Retirement
Attachments: B2H - EFSC letter 4 Retirement.docx

Kellen:

Please accept this response to the DPO.

Gail Carbiener

June 8, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment and object.
In eastern Oregon there are no 500-kV transmission lines. B2H is very large, sometimes three time the size of current lines in the area.

Exhibit W Retirement, 3.1 Estimated Useful Life:

Idaho Power claims that the transmission line will remain in service for perpetuity. There are no references or hard data to support this optimistic estimate. In fact, 500-kV long distance transmission lines were first built in the 1960s. This same argument is being used for the "Sams Valley Reinforcement Projects" by PacifiCorp. Over the last 50 years, wind power, solar power, local distributed energy, including new battery storage will certainly affect long distance transmission lines. Cancellation of 500-kV projects such as Cascade Crossing and Colusa-Sutter in California, are specific illustrations of changes being made by forward thinking executives.

Exhibit W Retirement, 3.2 Site Restoration Activities:

On page W-3, IPC is required to "remove foundations for each support structure to a depth of one (1) foot below grade, depending on ground slope." There will be over 4400 cement foundations, most at four feet



diameter, but some up to eight feet in diameter. Regrowth of native grasses, shrubs and trees will require more than one foot of soil. The requirement of one foot has been used on other energy facilities, but B2H is much larger than any other facilities constructed to date in eastern Oregon. IPC does not say how they will remove the reinforced concrete, but mechanical equipment will certainly leave cement chunks in the ground to be covered with some top soil. Weather erosion will soon show the remaining rebars and foundation.

ADDED CONDITION #1: Foundations will be removed to depth of three feet below grade.

Exhibit W Retirement and Financial Assurance Condition 1: This formula of required bonding will leave the public exposed to risk of returning the lands to preconstruction condition. Most damage will be done in the early stages of construction, such as ground disturbance for roads and right-of-way and foundation preparation. In (d.) bond or letter of credit amendments should be based upon qualified appraisal.

ADDED CONDITION #2: IPC will contract with a qualified construction appraiser to determine amount of construction completed at each six (6) month period. This amount will be used for bond or letter of credit adjustment if the amount is equal or more than \$250,000 from straight line formula.

Exhibit W Retirement and Financial Assurance Condition 2: A bond or letter of credit purpose, is to protect the public from the RISK of not having the site restored to a useful non-hazardous condition. EFSC is recommending that the Council approve the assumption that the risk to the public is ZERO (0) for 50 years, then remain under-insured for the next 50 years. If EFSC and IPC feel that the risk is zero, then the cost of the bond should be low. The risk should be moved to the bank, not forced upon the public. The fact that it may have an operating life of 100 years does not remove the risk that it is there and would need removal and ROW recondition.

ADDED CONDITION #3: On the date that the facility is placed in service, the bond or letter of credit will be set at the final appraised amount of restoration. This amount will be adjusted, by qualified appraisal, at least every 5 years.

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Wednesday, July 24, 2019 5:22 PM
To: B2H DPOComments * ODOE
Subject: DPO comments
Attachments: B2H - EFSC letter 1a Underground #2.docx

Kellen:

A second response for undergrounding.

Thank you
Gail Carbiener

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

July 24, 2019

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451

To: Chairmen Beyeler and Members of the Council

Idaho Power has used inflated costs to describe undergrounding for approximately two miles in front of the Oregon Trail Interpretive Center near Baker City. In addition, it is stated that ground disturbance will be more than overhead lines, however, most ground disturbance will be temporary and the transition stations will cover about 2 acres each. Most of the underground route is not on side hills, but can be placed at the toe of the hill, with most hills not more than 10% grade for half the corridor. None of the undergrounding will be on cultivated lands. Directional Drilling, for 1000 feet, will be recommended so the final exit and transition station will be on Baker County land not private lands. Splices will be required to connect the multiple sections of cable, and splicing vaults will be placed approximately every 1500 feet and covered with several feet of soil.

I have included pictures taken July 21, 2019 of the Southern California Edison's 500-kV underground line in Chino Hills.



The picture above shows a splicing vault with the manholes that are near ground level. Constructing B2H with only temporary ground disturbance, following the current 230 line, and needing only one splice vault, the route is 80% flat. Certainly, this needs to be considered.

The powerline comes over the hill and goes underground through the golf course. Cattle could graze on the hill.



The picture below, shows the transition station, built to the left for expansion and totaling approximately 2 acres.



Power Engineers provided a cost estimate at the AACE Level 5 for 1.5 miles. Class 5 estimates are generally prepared based on very limited information, and subsequently have wide accuracy ranges. As such, some companies and organizations have elected to determine that due to the inherent inaccuracies, such estimates cannot be classified in a conventional and systematic manner. Class 5 estimates, due to the requirements of end use, may be prepared within a very limited amount of time and with little effort expended—sometimes requiring less than an hour to prepare.¹

Power Engineers were involved with the Southern California Edison Chino Hills underground 500-kV power line so should be asked to provide a Class 3 Cost Estimate using the AACE guidelines. This will provide an accurate cost estimate for the total of two-miles.

Class 3 estimates are typically prepared to support full project funding requests, and become the first of the project phase control estimates against which all actual costs and resources will be monitored for variations to the budget. They are used as the project budget until replaced by more detailed estimates.²

The Chino Hills project crossed two major thoroughfares, several minor roadways, a shopping center, two flood-control channels and two holes of a golf course. One-third of the alignment was on a 15 percent average grade, with slopes as steep as 35 percent in some locations. In all, the project involved the installation of approximately 17,000 linear feet of duct bank and numerous horizontal drills ranging from 800 to 2,100 feet in length.³

Power Engineers in Errata BB, additions to Complete Application, have estimated that 1.5 miles of undergrounding will cost between \$102 and \$111 million. According to the article *Out of Sight Out of Mind* this estimate is grossly overestimated.⁴

Using Mr. Hall's updated Edison Electric Institute calculations, the 2-mile underground new construction is more likely to be \$67 to \$70 million.

I do not agree with **3.4.2 Conclusion Regarding Undergrounding of the Project:**

..... because of the high cost of an underground line compared to overhead 500-kV lines, unproven technology over long distances for 500-kV, reliability and reactive compensation issues for long installations, and increased land disturbance, the alternative of placing the 500-kV line underground was not considered feasible for the Project.

Therefore, the Energy Facilities Siting Council should require a condition in the proposed order that requires an AACE Cost Estimate at the Level 3 be presented and approved by EFSC prior to construction.

¹ www.aacei.org

² www.aacei.org

³ Underground construction magazine 5/7/2017

⁴ *Out of Sight, Out of Mind*, 2012: An Updated Study on the Undergrounding of Overhead Power Lines, Prepared by: Kenneth L. Hall, P.E. Hall Energy Consulting, Inc.; Prepared for: Edison Electric Institute January 2013

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Saturday, August 10, 2019 3:13 PM
To: B2H DPOComments * ODOE
Subject: B2H Draft Proposed Order
Attachments: B2H - Letter 8.docx

Kellen:

Please accept my final response to the B2H Draft Proposed Order.

best
Gail Carbiener

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 10, 2019

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR 97701-7927
(541) 312-1451

To: Chairman Beyeler and Members of the Council

Thank you again for the opportunity to comment on the Draft Project Order for B2H. I look forward to the opportunity of comment in person.

After reading thousands and thousands of document pages, and attempting to understand all the rules and regulations, I have submitted several responses. However, it is clear Idaho Power will have a significant number of "final" plans that will be submitted after the August 22, 2019 comment closing date. These include Fire Protection, Vegetation, Geotechnical, Blasting, Scenic, Noise and others.

A perfect example of one of these is: Public Services Condition 2: Prior to construction, the site certificate holder shall submit to the department for its approval a Helicopter Use Plan, which identifies or provides: a. The type of helicopters to be used (all helicopters must be compliant with the noise certification and noise level limits set forth in 14 C.F.R. § 36.11); b. The duration of helicopter use; c. Roads or residences over which external loads will be carried; d. Multi-use areas and light-duty fly yards containing helipads shall be located: (i) in areas free from tall agricultural crops and livestock; (ii) at least 500 feet from organic agricultural operations; and (iii) at least 500 feet from existing dwellings on adjacent properties; and e. Flights shall occur only between sunrise and sunset.

Another example is: Public Services Condition 3: Prior to construction, the certificate holder shall finalize, and submit to the department for its approval, a final Fire Prevention and Suppression Plan.

Another: A list of streams including name, size, location, stream type, and RMA width will be provided in IPC's final Plan for an Alternate Practice prior to initiation of harvest activities. Prior to activity within 100 feet of type F or D streams, IPC will submit a written plan in accordance with OAR 629-605-0170.

These and other activities, not made public until after the closing of comment period, are vital public concerns. Myself, and others have responded to what is currently available from Idaho Power, but will those details change in the Final Plan?

The Siting Council should consider an Amended Draft Proposed Order and require Final Plans. Confidential data can be redacted.

Thank you

TARDAEWETHER Kellen * ODOE

From: Gail Carbiener <mcgccarb@bendbroadband.com>
Sent: Monday, August 19, 2019 5:23 PM
To: B2H DPOComments * ODOE
Subject: response to DPO
Attachments: B2H - Letter A.docx

Kellen:

After reading the RAI and IPC responses, I submit these additional comments.

best
Gail Carbiener

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

August 19, 2019

Via E-MAIL: B2H DRAFT PROJECT ORDER

From: Gail Carbiener
2920 NE Conners Ave., Apt 207
Bend, OR. 97701-7927
(541) 312-1451
mcgcarb@bendbroadband.com

Subject: Idaho Power Application for a Site Certificate.

Chair Beyeler and Members of the Council:

Please accept these final comments on the B2H power line project. I appreciate the opportunity and look forward to presenting in person.

Amended Site Certificate, page U-25

Page U-25 states, "Construction workers and maintenance personnel are not trained firefighters and are not expected to fight fires. However, qualified equipment operators, at the direction of Incident Command, may use construction equipment to assist local firefighting efforts when safe to do so." Idaho Power states: Page U-25 is revised in the Exhibit U Errata to include the following text: In the event of a fire, the Incident Management Team may request local assistance in **fire fighting, if personnel have required training including the use construction equipment on the Project site.** (emphasis by Carbiener)

Idaho Power continues to ignore the factor of time. Incident Management Teams are called in after the fire is beyond control of local personal, in this case the contractor and local fire districts. Local districts are responsible for relatively small areas, and the contractor does not have fire fighting as the top priority.

Idaho Power continues to under-estimate the potential for fire and the possibility of loss of property and life. The response confirms my previous recommendation, which improves the day to day fire protection from the multiple districts and provides "on-site" protection.

Idaho Power or the Contractor during construction, shall provide enhanced fire protection. This will include a four-wheel drive fire engine that is designed for rapid deployment. For example, a "Type 3 fire engine" which typically includes a pump operating at 120 gpm, a large 500 gal/tank, 1000 ft. 1 1/2" hose. A minimum crew of two will be present during all hours of construction, including equipment servicing and maintenance.

Exhibit N: Need.

It is important to know that Idaho Power's 2019 Integrated Resource Plan has been presented and then postponed until October 31, 2019. If significant changes are made to the 2019 Plan from the 2015 Plan, that has been relied upon by EFSC Staff, some Exhibits may need revision. Exhibits A, D, M, U, and W will be affected by different assumptions. For example, financial responsibility if a participant drops out, or if the Oregon Public Utilities Commission enacts wildfire regulations.

I recommend that EFSC revisit the need for the B2H.

Exhibit S – Cultural Resources; Section 3.4.1

Idaho Power stated that resources that could not yet be properly evaluated are recommended as unevaluated but are treated as NRHP-eligible for the purposes of analysis. A specific segment of the Oregon Trail was presented to the State Advisory Committee on Historic Preservation on February 22, 2019. The following motion was made:

Oregon Trail: La Grande to Hilgard Segment

Ms. Trice moved to forward the nomination to the Keeper of the National Register under Criterion A with amendments as recommended by the committee. Ms. Oberst seconded. The motion passed unanimously.

The boundary of the nominated segment extends 250 feet on either side of the centerline of the Oregon Trail or to the margin of private property if the distance is less than 250 feet. The total distance of the nominated trail segment is 3.66 miles. Oregon Trail is within Section 7 T3S R38E, and Section 12 T3S R37E and in Section 10 T3S R37.

This segment is all on private property and is within 150 feet of the center line of the ROW for B2H. This segment should be noted prior to construction.

Thank you
Gail Carbiener

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing 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.

Sandra K. Coulson

Signature

Sandra K. Coulson

Printed Name

Mailing Address:

A.O, Box 177
Cove, OR 97824

Conrad
P.O. Box 527
LaGrande, OR
97850

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AUG 19 2019
DEPARTMENT OF ENERGY

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Oregon Energy Facility Siting Council
c/o Kellen Tardavault, Senior Siting
Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR
97301

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 ASC and DPO which will be addressed in a separate comment.


Signature

Name: *DAVID CARROLL*

Address: *P.O. Box 567
LaGrande, OR
97850*

F. Carroll
101 N Avenue
La Grande, OR 97850

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Energy Facilities Siting Council
c/o Kelley Tardaweather, Sr. Siting Analyst
OR Dept of Energy
550 Capitol St. NE
Salem, OR 97301

RECEIVED
AUG 19 2019
DEPARTMENT OF ENERGY

97301-374299



August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,

A handwritten signature in cursive script that reads "Terri Carroll". The signature is written in black ink and is positioned above a horizontal line.

Name: Terri Carroll

Address: 701 M Avenue
La Grande, OR. 97850

12 August 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:


As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within 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: Verna W. Carroll

Address 1602 First Street
La Grande, OR 97850

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire 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,

Jenilyn A. Carter

Name *Jenilyn A. Carter*
Address *1803 Linda Lane*
LaGrande, Or. 97850

*Don't put our lives, homes and community at risk
by building this transmission line so close to
own homes!!*

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

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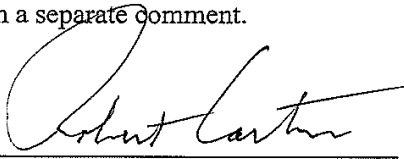
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Signature

Name: ROBERT CARTER

Address: 1803 Linda Lane
La Grande, OR 97850

PS

The B2H powerline will be a permanent visual blight on the entire city of LaGrande. If this powerline is required, bury it underground through Union County !!

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment 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

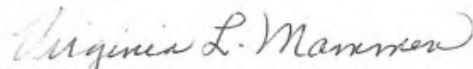
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

Exhibit 1

City of La Grande Ordinance Number 3242,
 Series 2018
 Page 236 of 312

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

²The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³These right-of-way width ranges are for new streets.

⁴Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

Exhibit 2

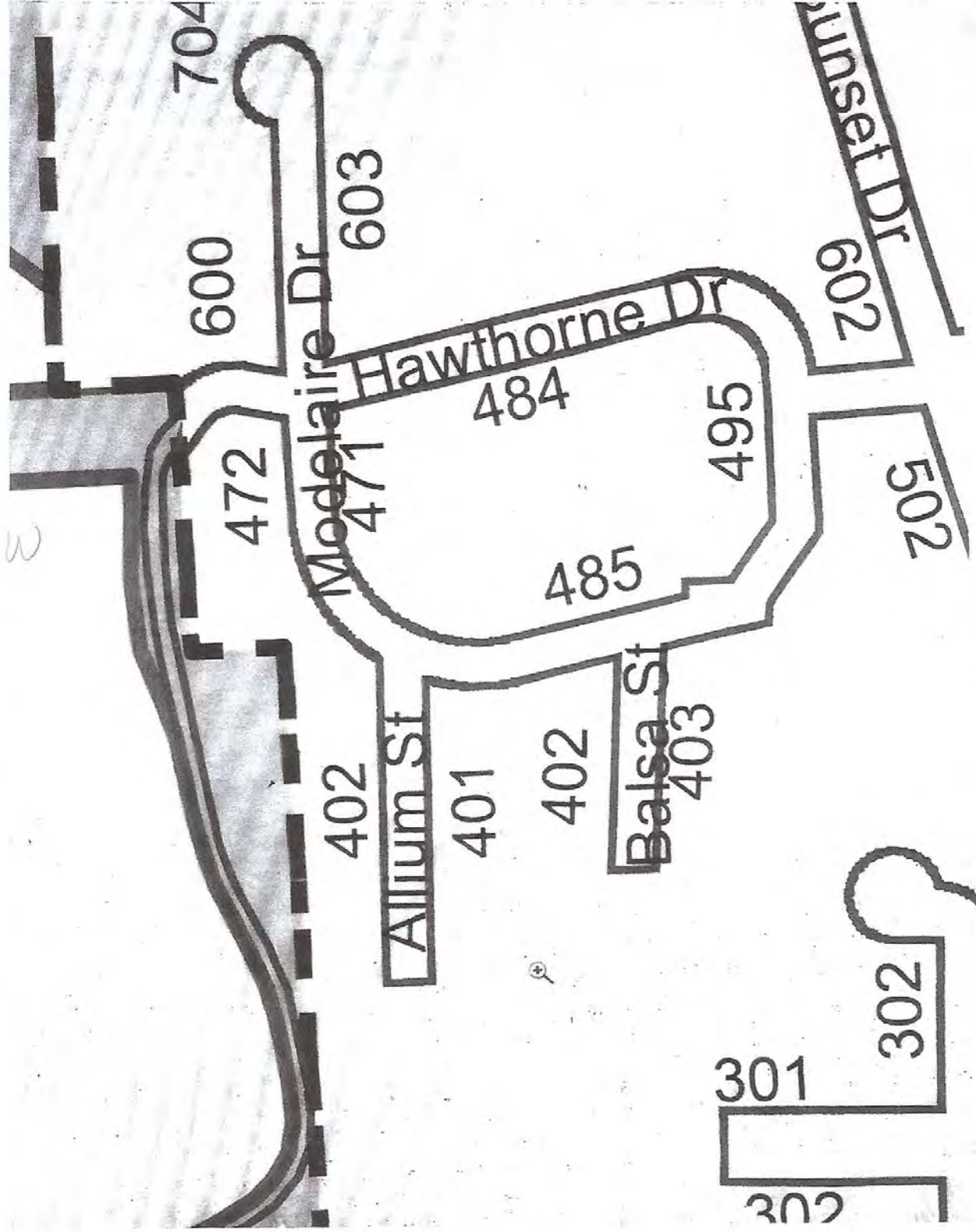


Exhibit 3

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety. Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

Exhibit 6

7/25/2019

Gmail - Modelaire Roadway Specifications



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



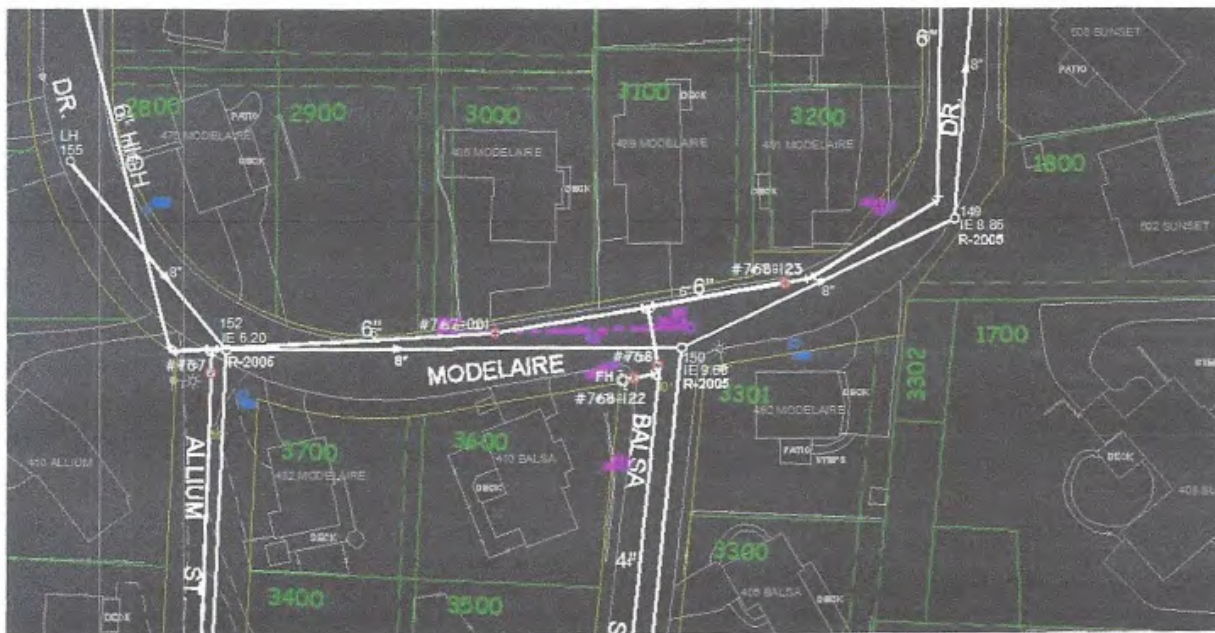
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

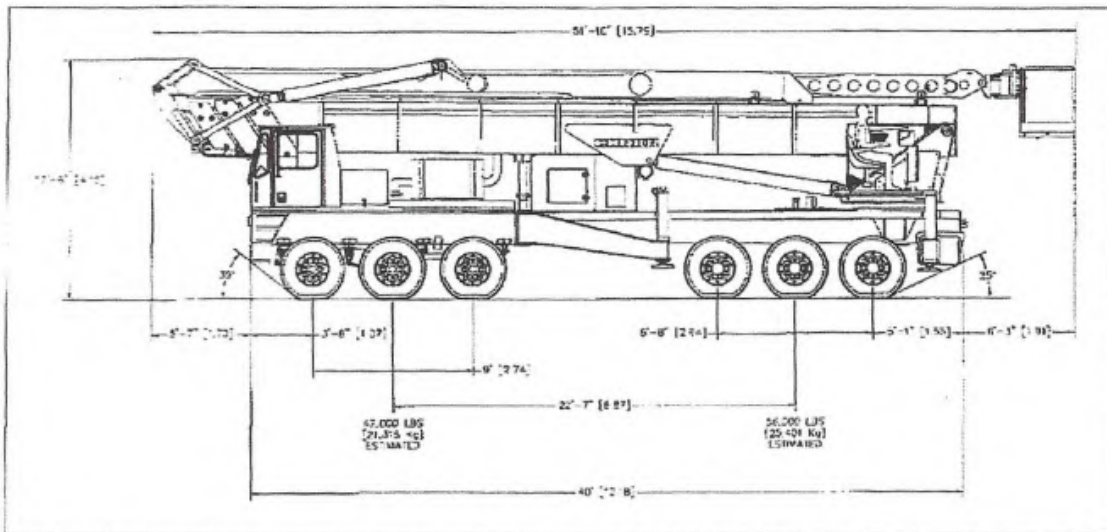


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-

Exhibit 11

City of La Grande Ordinance Number 3242,
Series 2018
Page 252 of 312

ARTICLE 6.6 – PUBLIC STREET STANDARDS

SECTION 6.6.001 - PURPOSE

Upon the request of the La Grande City Council, a variety of street design standards have been reviewed and are now incorporated in the Land Development Code.

SECTION 6.6.002 - CLASS I IMPROVEMENT STANDARDS

This classification will cover those streets that are designed to meet the standards for an expected life of twenty (20) years or more. The attached drawings shall be the minimum standard for those streets in this classification. All streets designated as Federal Aid Urban Streets (F.A.U.) shall be constructed under these design standards. Streets in this designation shall be constructed with sidewalks when at all possible in an effort to increase pedestrian safety. Collector streets are designed to withstand normal trucks of an HS 20 loading. Larger trucks are to utilize Arterial streets where at all possible. This level of development shall be the ultimate goal for all streets within the City of La Grande.

Possible means of financing available for this Class shall be methods A, B, C, D, E, F, G, and H in Section 6.6.006.

A. Advantages

1. The construction life is extended to a period above other City standards.
2. The visible aesthetics in relationship to having curbs and a blacktop surface with landscaping or concrete driveways and a sidewalk is generally appealing to the public.
3. Easy maintenance for the Public Works Department for cleaning and minor repair.
4. Storm sewer drainage is confined within the bounds of the curbs during minor flooding periods.
5. Parking is restricted to a solid barrier, that being the curb; this restricts parking in the area on the back side of the curb and confines travel to the street surface.
6. Defined areas for possible cross walks, signs, power poles, and other utilities that are restricted to the outside areas behind the curbs.
7. It allows for a wide range of financing methods and is to City standards for a ten (10) year Bancroft bonding.
8. Provides a dust free surface.

B. Disadvantages

1. The extreme high level of cost that is incurred with this type of development.

SECTION 6.6.003 - CLASS II IMPROVEMENT LEVEL

Streets constructed in this classification shall be constructed to the same standards as Class I Streets with the exception of the form of drainage system. These streets shall meet the standards as shown on the attached drawing. This level of construction shall be only utilized in substitution for Class I Streets when it is determined by the City Council at the recommendation of the City Engineer or Engineering Superintendent, that an adequate drainage system cannot be installed for a Class I Street.

Exhibit 12

Transportation and Traffic Plan

Boardman to Hemingway Transmission Line Project

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

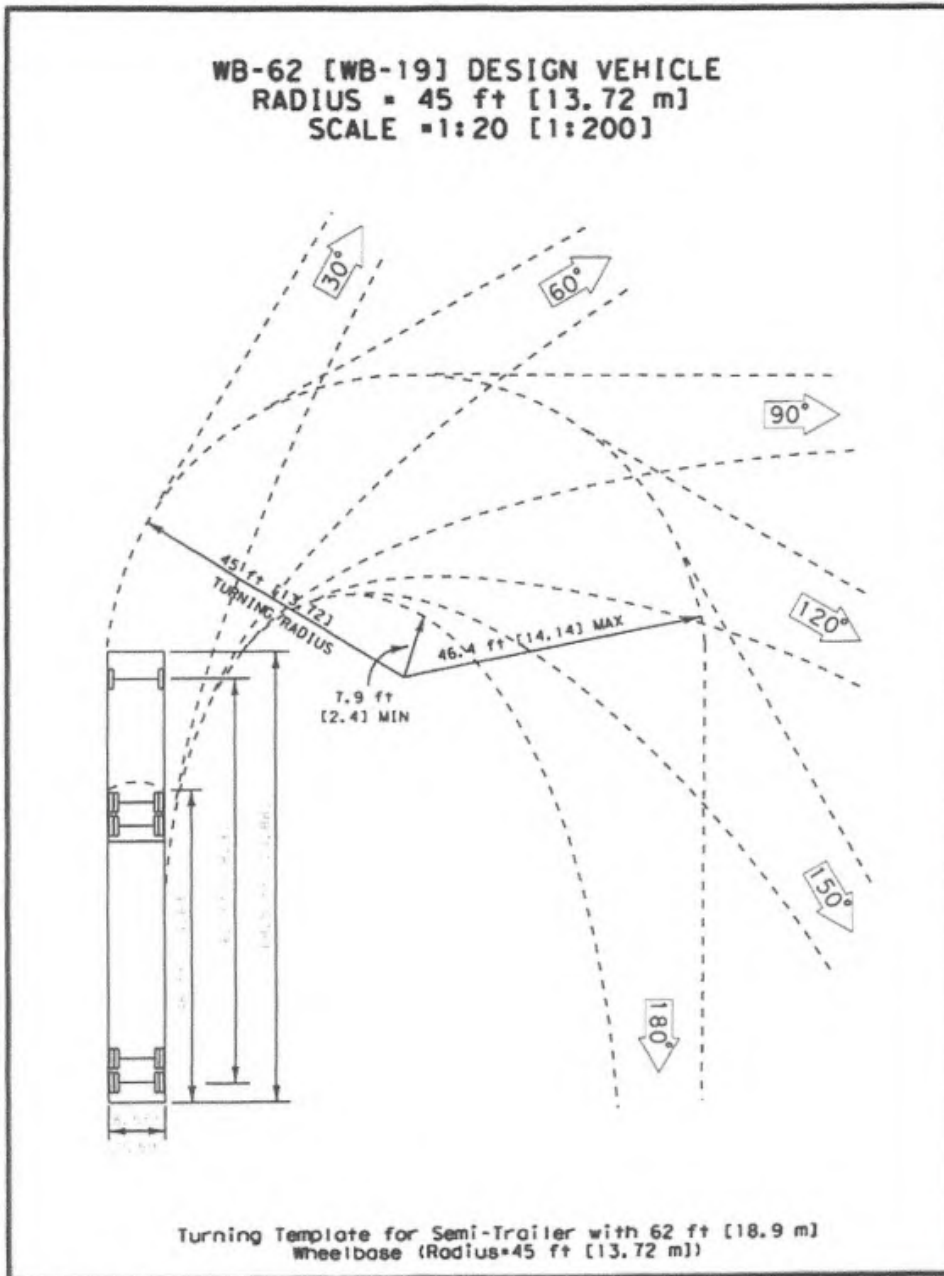


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

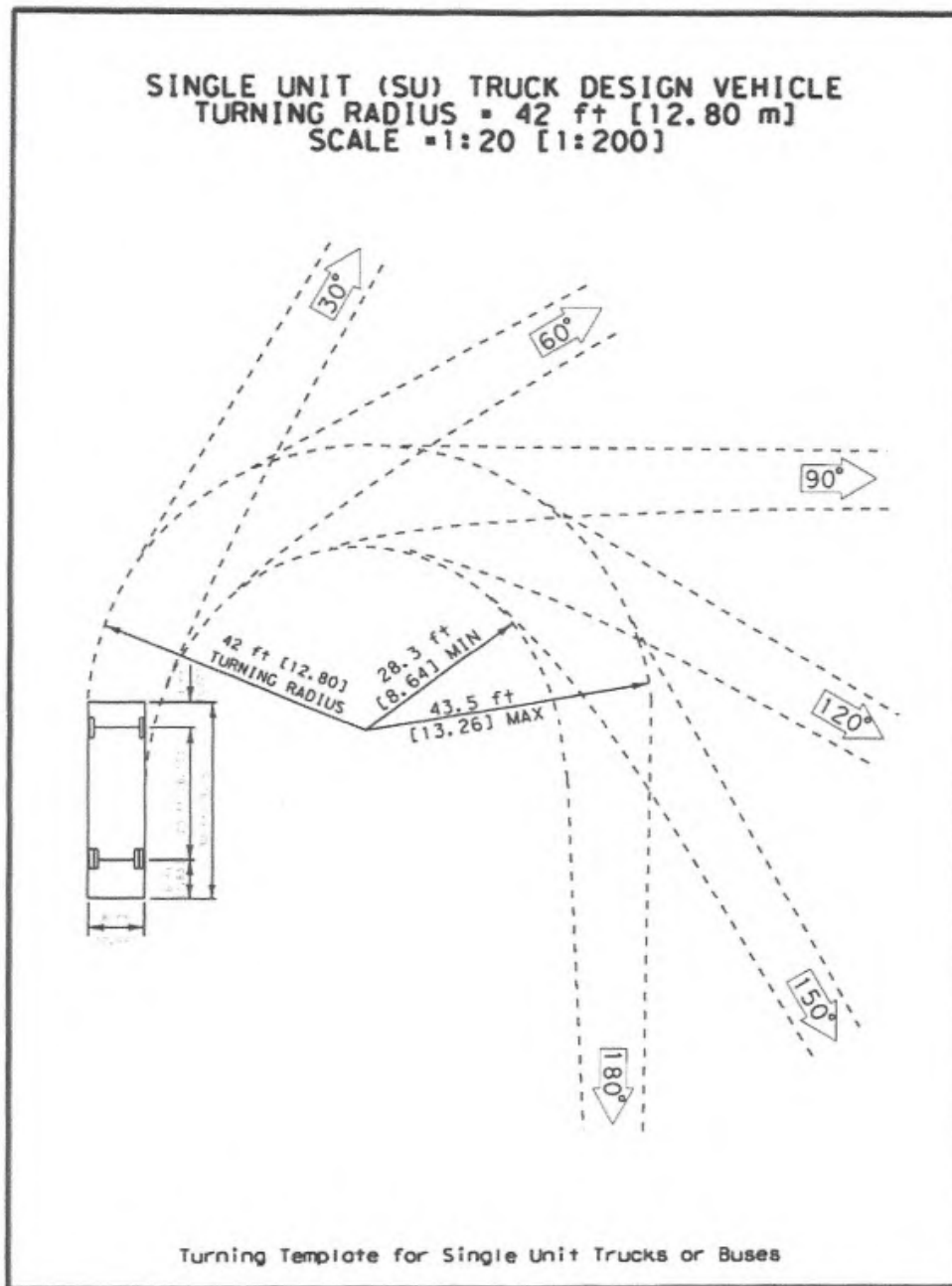


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

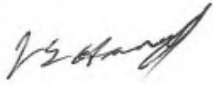
Section 17. TRUCK ROUTES

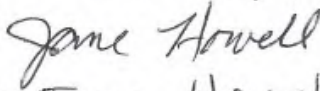
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

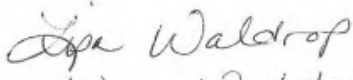
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

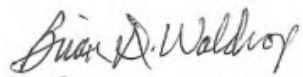
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

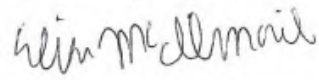
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
ADDRESS 482 Modelaire DR
EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
ADDRESS 475 MODELAIRE DR.
EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRE DR.
EMAIL mcilmail154@hotmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850
jessiehuxell@live.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

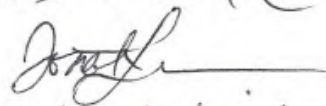

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

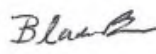

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

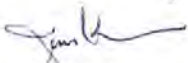
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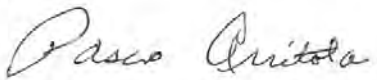

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

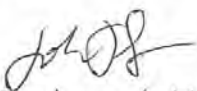
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@conr.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

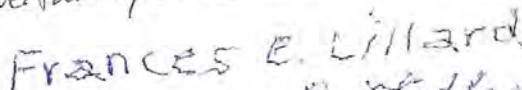
SIGNATURE 
PRINTED NAME Judie Arritola
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PRINTED NAME Pasco Arritola
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SIGNATURE 
PRINTED NAME John Bazuta
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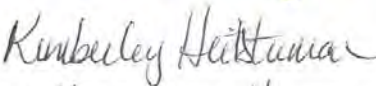
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

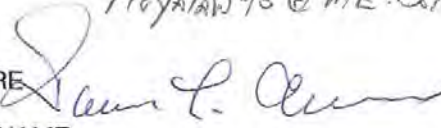
SIGNATURE 
PRINTED NAME Brent H. Smith
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EMAIL smithbrent@gmail.com

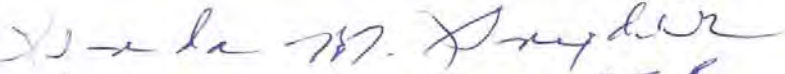
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

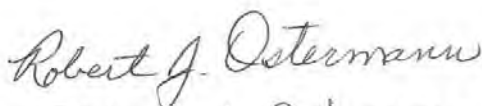
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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EMAIL kimheitstuman@hotmail.com

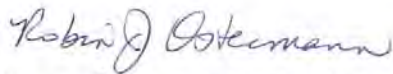
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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
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EMAIL N/A

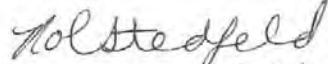
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL


SIGNATURE 
PRINTED NAME Robert J. Ostermann
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EMAIL

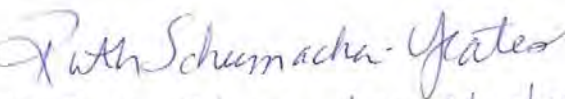
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
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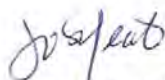
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
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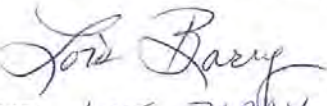
SIGNATURE 
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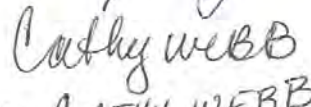
SIGNATURE 
PRINTED NAME Rita Allen
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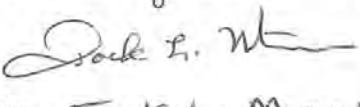
SIGNATURE 
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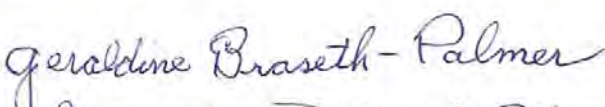

SIGNATURE 
PRINTED NAME JOHN YEATES
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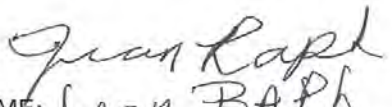
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SIGNATURE 
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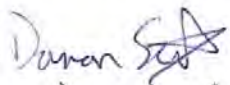
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
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EMAIL Buff Martin 27 @GMail .com

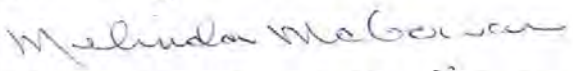
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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SIGNATURE 
PRINTED NAME Jean BAPH
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EMAIL Jbaph19@gmail.com

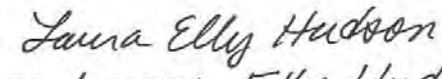
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SIGNATURE 
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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
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SIGNATURE *Lynn Wheeler Duncan*
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SIGNATURE *Robert J. Sherer*
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SIGNATURE *Bert R. Frewing*
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SIGNATURE *Lindsay McCullough*
PRINTED NAME Lindsay McCullough
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EMAIL lindz_mm91@hotmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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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*
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SIGNATURE *Carol S. Summers*
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SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
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EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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PRINTED NAME
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

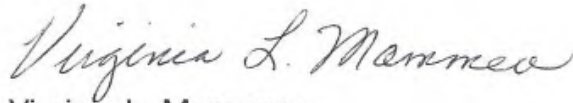
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰ These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable.¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

Sincerely,

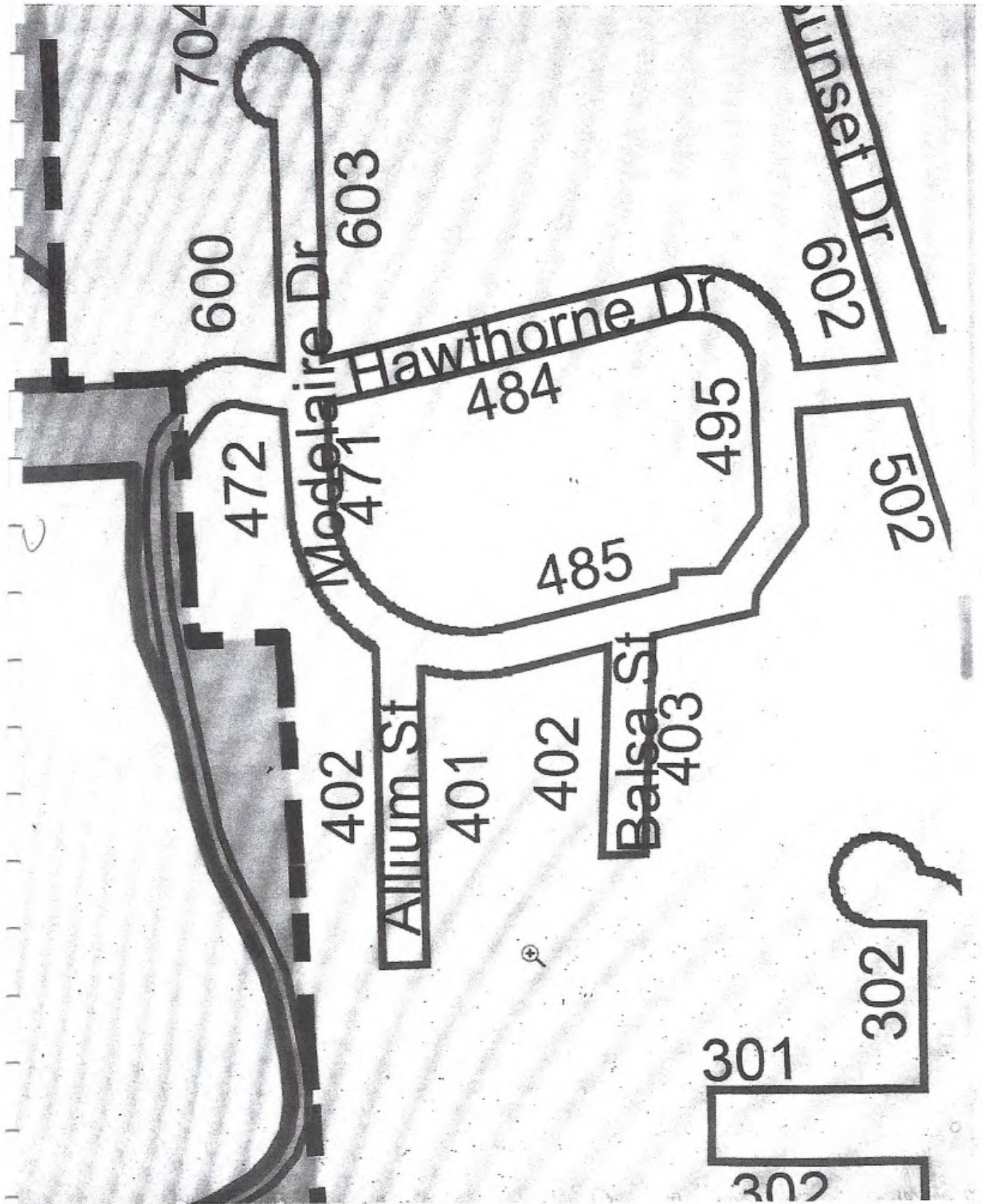


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



2

11

5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

1 **3.3 Predicted Noise Levels**

2 OAR 345-021-0010(1)(x)(A): Predicted noise levels resulting from construction and operation
3 of the proposed facility.

4 **3.3.1 Construction Noise**

5 **3.3.1.1 Predicted Construction Noise Levels**

6 Project construction will occur sequentially, moving along the length of the Project route, or in
7 other areas such as near access roads, structure sites, conductor pulling sites, and staging and
8 maintenance areas. Overhead transmission line construction is typically completed in the
9 following stages, but various construction activities may overlap, with multiple construction
10 crews operating simultaneously:

- 11 • Site access and preparation
- 12 • Installation of structure foundations
- 13 • Erecting of support structures
- 14 • Stringing of conductors, shield wire, and fiber-optic ground wire

15 The following subsections discuss certain construction activities that will periodically generate
16 audible noise, including blasting and rock breaking, implosive devices used during conductor
17 stringing, helicopter operations, and vehicle traffic.

18 **Blasting and Rock Breaking**

19 Blasting is a short-duration event as compared to rock removal methods, such as using track rig
20 drills, rock breakers, jackhammers, rotary percussion drills, core barrels, or rotary rock drills.
21 Modern blasting techniques include the electronically controlled ignition of multiple small-
22 explosive charges in an area of rock that are delayed fractions of second, resulting in a total
23 event duration that is generally less than a second. Impulse (instantaneous) noise from blasts
24 could reach up to 140 dBA at the blast location or over 90 dBA within 500 feet.

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.

34 **Implosive Devices**

35 An implosive conductor splice consists of a split-second detonation with sound and flash.
36 Implosive splicing activities are anticipated to be limited to daytime hours. A blasting plan will be
37 developed by an individual certified and licensed to perform the work. The plan will
38 communicate all safety and technical requirements including, but not limited to, delineation of
39 the controlled access zone and distance away from residences.

Exhibit 3

Public Services

OAR 345-022-0110

This standard ensures that the proposed facility will not affect the ability of service providers in local communities to provide public services, such as fire protection or education. The applicant must assess the proposed facility's need for water and for disposal of wastewater, storm water and solid waste. The applicant must also evaluate the expected population increases in local communities resulting from construction and operation of the facility; and must address all permanent and temporary impacts of the facility on housing, traffic safety, police and fire protection, health care and schools. The Council must determine whether the applicant has identified potential adverse impacts to service providers and proposed adequate mitigation to ensure that there will be no significant adverse effect on the ability of a service provider to provide services. In considering the impacts, the Council solicits comments from affected local governments, fire or police departments, school districts and health care agencies.

Waste Minimization

OAR 345-022-0120

This standard requires the Council to evaluate the applicant's proposal to minimize solid waste and wastewater generated by construction and operation of the proposed facility. The standard requires recycling of wastes, if feasible, or proper waste disposal if recycling is not feasible.

The applicant must evaluate the types of waste products that would be produced during construction and operation of the proposed facility and estimate the amounts or volume of waste products. The applicant must propose appropriate methods to handle the waste through collection, storage and disposal. Compliance with the standard assures that the applicant will reduce the amount of waste generated and dispose of waste in a responsible manner.

Need for a Facility

OAR 345-023-0005

This standard requires the applicant for non-generating energy facilities (such as electric transmission lines) to demonstrate the need for the proposed facility. The Council's rules allow an applicant to demonstrate need for a non-generating facility through one of several methods, including the "Least-Cost Plan Rule" (OAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (OAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

OAR 345-024-0010 and 345-024-0015

- This standard requires the Council to evaluate applications for wind energy facilities to ensure that applicants can design, construct and operate the facility so that that the public is not endangered by moving turbine blades or electrical equipment, and that the applicant can design, construct and operate wind turbines to prevent structural failure that could endanger public safety.
- Siting standards for wind facilities also require the applicant to reduce cumulative adverse environmental effects in the vicinity by using existing roads, if possible, placing collection lines underground, designing the facility to avoid impacts to vulnerable wildlife in the area (especially birds and bats), and designing the facility to minimize adverse visual features, including using the minimum amount of lighting necessary to meet the requirements of the Federal Aviation Administration for protecting aircraft.

Specific Standards for Transmission Lines

OAR 345-024-0090

This standard requires that the Council evaluate transmission lines under Council jurisdiction to ensure they are designed, constructed and operated to limit the strength of electromagnetic fields in areas where those lines are accessible to the public.



8/5/2019

Oregon Secretary of State Administrative Rules

Exhibit 4a

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Department of Environmental Quality

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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.

Exhibit 4b

8/5/2019

Oregon Secretary of State Administrative Rules

(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;

Exhibit 5a

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.

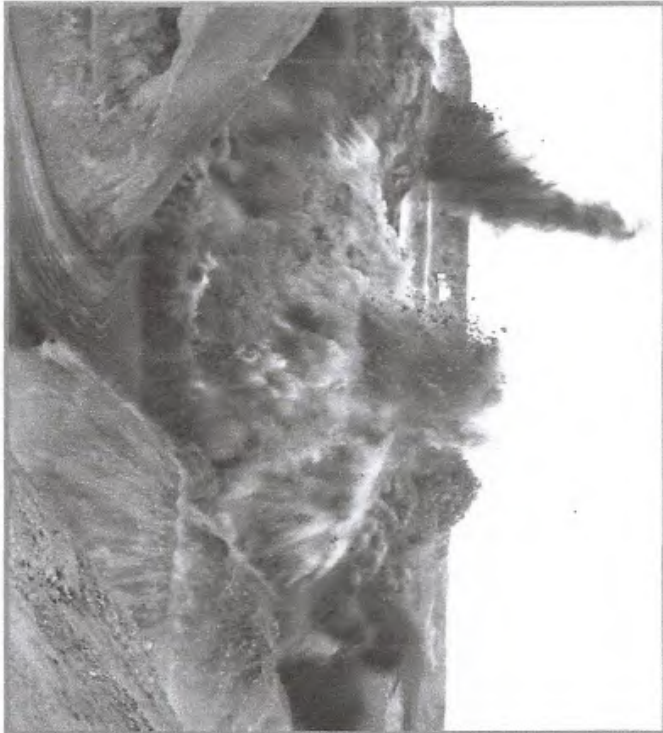
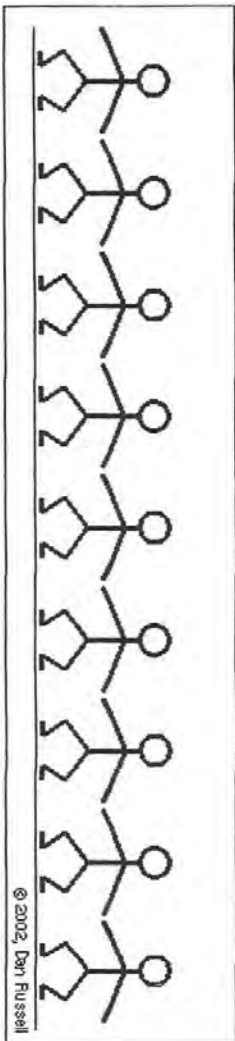


Exhibit 56

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.

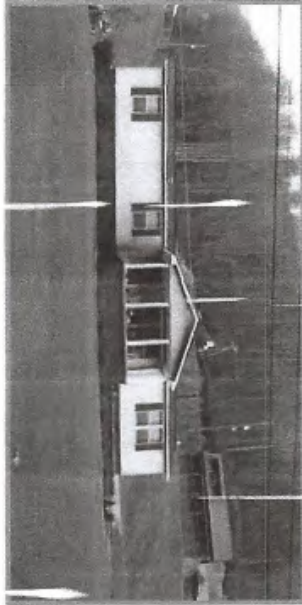
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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.

Exhibit 5g

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

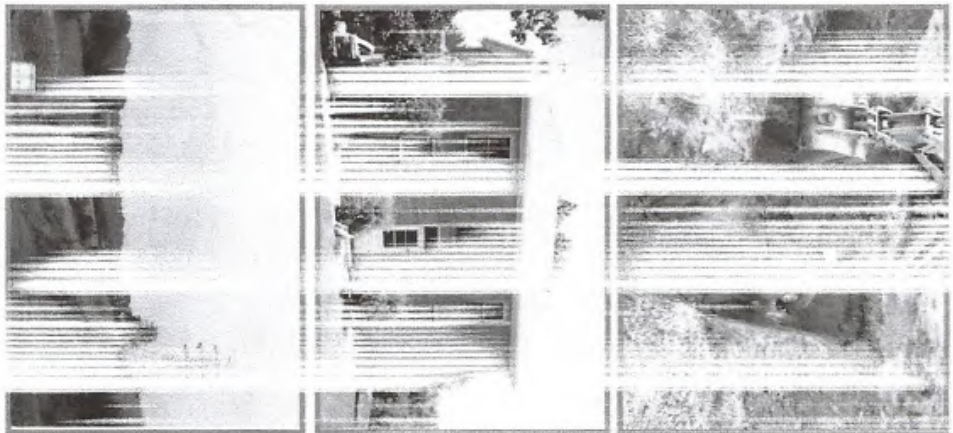
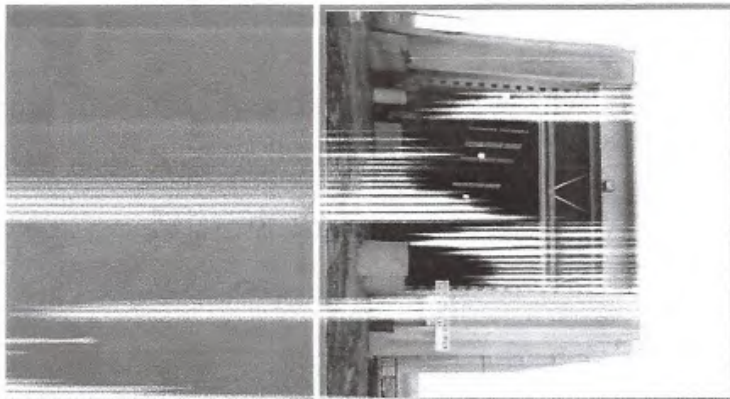
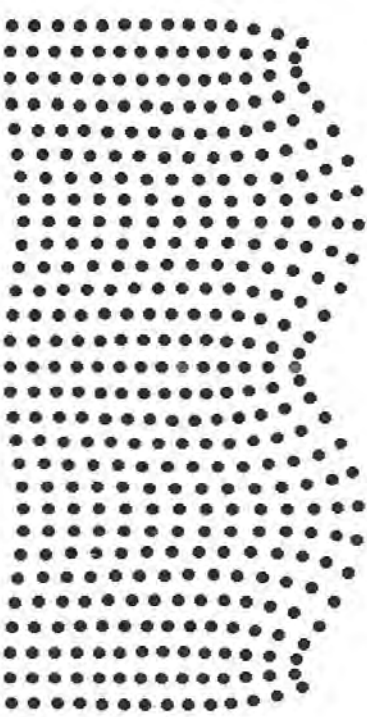


Exhibit 5D

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.



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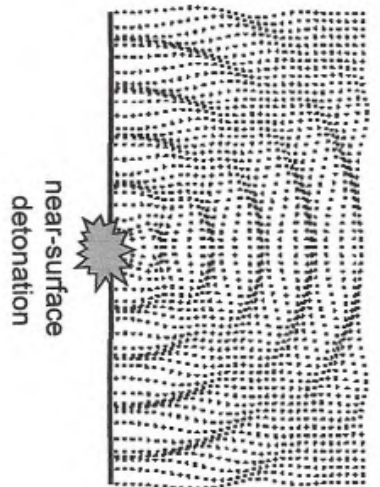
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

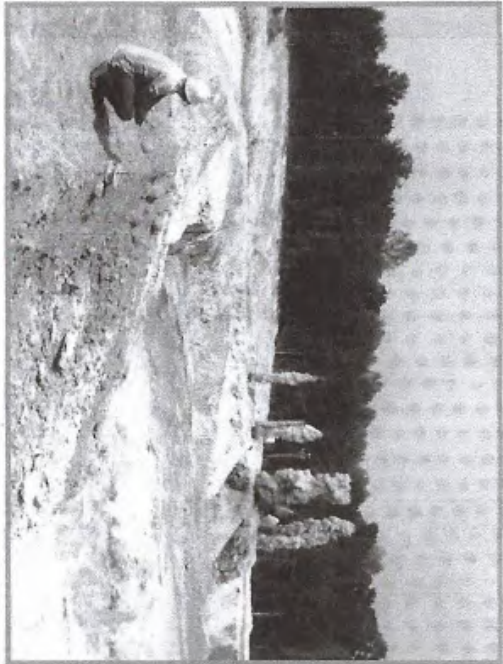
Exhibit 5 e
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

Exhibit 5 F

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

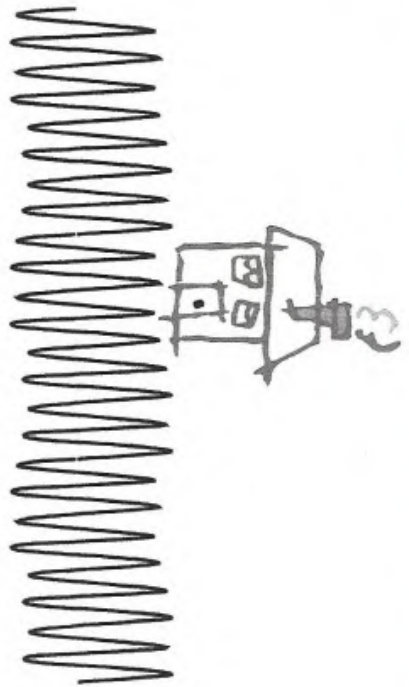
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

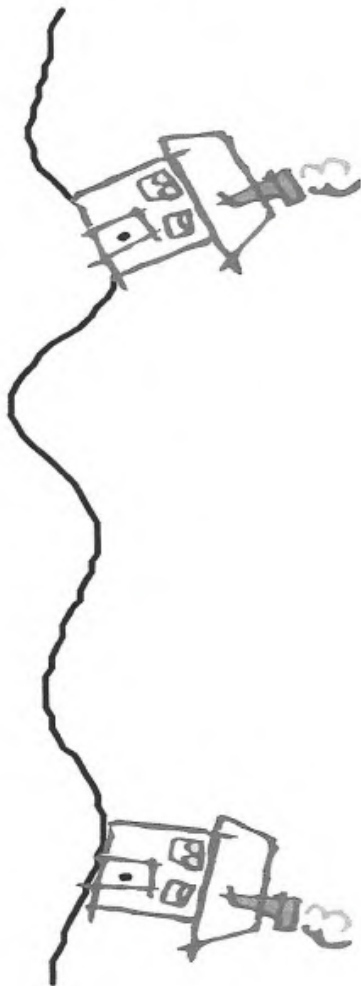


Ground Vibration Structure Response

Exhibit 5g



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 - Harvard Health

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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."

Exhibit 7a

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal



UVM Medical Center Blog (<https://medcenterblog.uvmhealth.org>) » Blog (<https://medcenterblog.uvmhealth.org/blog/>) »
Quiet in the Hospital: How Noise...

Quiet in the Hospital: How Noise Reduction Helps Patients Heal

on June 7, 2018 (<https://medcenterblog.uvmhealth.org/innovations/hospital-noise-reduction/>) in Innovation (<https://medcenterblog.uvmhealth.org/category/innovations/>) by UVM Medical Center (<https://medcenterblog.uvmhealth.org/author/uvmmedcenter/>)

Noise. It is present in almost every aspect of our lives. From the traffic in the streets, to the fan that provides us white noise in the background to sleep, noise exists. Unfortunately, like stress, too much of it can have a negative impact on a person's health and rest. Some sounds we do like to hear, such as birds chirping, signaling spring in Vermont, but what about sounds in a hospital?

Many of us get admitted to hospitals when we are too sick to take care of ourselves at home. We expect exceptional care from physicians and nurses and, of course, to rest in order to help our bodies heal. We understand that some noises in a hospital are necessary for care; however, others simply aren't.

The Sounds of a Hospital

Many organizations, including the UVM Medical Center, have high tech equipment, which greatly assists in the delivery of care to our patients, but can also be noisy. Sometimes, healthcare providers are the source of the noise as we interact and communicate with our patients and other health team members.

Another factor is visits from families and friends during visiting hours. It is difficult when one's roommate is trying to rest in the opposite bed. Yet, we need to be cognizant of noise in patient care areas as sounds can be magnified and misinterpreted, increasing agitation and even confusion for some patients.

We become accustomed to the noise; our patients are not.

The Research on Noise, Quiet, and Healing

8/4/2019

Hospital Noise: How Noise Reduction Helps Patients Heal

Exhibit 76

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.

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

Exhibit 8a

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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



Exhibit 8b

8/4/2019

Dangerous Decibels: Hospital Noise More Than a Nuisance | RN.com

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).

Exhibit 3

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Around the country, "quiet campaigns" have been launched by hospitals in an attempt to dampen nighttime noise. Besides dimming lights and asking staff to keep their voices down at night, they are working to eliminate overhead paging systems, replace wall and/or floor coverings – even the clang of metal trashcans. Northwestern's Prentice Women's Hospital in Chicago was built with noise reduction in mind, replacing the idea of centralized nursing stations with the advent of smaller, multiple stations (Deardorff, 2011)

Billed as "one of the nation's largest hospital construction projects," Palomar Medical Center in North San Diego County is a state-of-the-art facility that has been designed "to encourage quietness," according to Tina Pope, Palomar Health Service Excellence Manager. Slated to open its doors this August, the hospital will feature a new nursing call system to route calls directly to staff and help eliminate the need for overhead paging, de-centralized nursing stations and clear sig lines, allowing staff to check on patients without having to leave unit doors open. With measures already in place including "Quiet Hospital" badges on staff and posters at the entrance of every unit, a "Quiet at Night" campaign (9 p.m. – 6 a.m.), and a "Quiet Champions" program that encourages staff to report noise problems, Palomar is one of a growing number of hospitals working toward a new era of quiet.

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8/6/2019

<https://knops.co/magazine/noise-and-ptsd/>

Exhibit 9
a



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

Exhibit 9b

8/6/2010

trauma or flashbacks.



Fear

PTSD can also cause a general fear of sounds: phonophobia, or a fear of some specific sounds: misophonia. Survivors of the disorder also are generally much more sensitive to sounds and perceive them as much louder than other people would.

All of this makes the life of people with PTSD very hard. If you think you are suffering from this, consult your doctor. Really, please do it. For yourself, and for the ones you love.

Do you have PTSD and would you like to tell your experiences to us? We are always very open and interested to hear what you have to say. And again: if you haven't done it yet, visit your doctor, please. Thank you!

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8/4/2019

Does noise affect learning? A short review on noise effects on cognitive performance in children

Exhibit 10a



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PMID: [24009598](https://pubmed.ncbi.nlm.nih.gov/24009598/)

Does noise affect learning? A short review on noise effects on cognitive performance in children

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This article was submitted to Developmental Psychology, a section of the journal Frontiers in Psychology.

Received 2013 May 14; Accepted 2013 Aug 12.

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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

8/4/2019

Does noise affect learning? A short review on noise effects on cognitive performance in children

EXHIBIT 10/12

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,

8/4/2018



Walk Donate Q

Exhibit 11a

Autism & Anxiety: Parents seek help for extreme reaction to loud noise

September 5, 2018

Our 12-year-old son has autism, mild intellectual disability and anxiety attacks so severe that we end up in the emergency room. Loud noises are the worst – for example the school fire alarm, thunderstorms, a balloon popping, fireworks. Any help would be greatly appreciated.



This week's "Got Questions?" answer is by Judy Reaven, a clinical psychologist and associate professor of psychiatry and pediatrics at the University of Colorado School of Medicine and Children's Hospital Colorado, in Denver. Dr. Reaven's conducted research on the effectiveness of cognitive-behavioral therapy for anxiety in adolescents with autism, with the support of an [Autism Speaks research grant](#).

Editor's note: The following information is not meant to diagnose or treat and should not take the place of personal consultation, as appropriate, with a qualified healthcare professional and/or behavioral therapist.

Thanks for the great question. It certainly sounds like your family is experiencing a very difficult situation. Anxiety symptoms and reactions are very common in individuals with autism spectrum disorder (ASD). They can interfere with functioning across home, community and school settings.

Although your son's reaction sounds more severe than most, many people with autism struggle with a range of fears, phobias and worries. These can range from a debilitating fear of, say, spiders or the dark to chronic anxiety about making mistakes or being late.

Fortunately, recent research suggests that anxiety in children and adults who have autism is quite treatable. Often, these individuals are helped by the same or similar strategies that work well in treating anxiety in the general population.

These approaches include cognitive behavior therapy, or CBT. Cognitive-behavioral approaches are well-established, evidenced-based treatments that have become the gold standard of psychosocial treatments for anxiety. [My own research](#) and that of my colleagues has demonstrated the helpfulness of modifying cognitive-behavioral approaches to address the special needs of those who have autism.

Where to begin?

You describe a number of fears that may be related to sensory sensitivities. I recommend that you begin by consulting an occupational therapist who can assess whether your son's extreme sensitivities to noises are part of a broader sensory processing disorder. If this is the case, and if your son's fears are exclusively triggered by sensory stimuli, then his symptoms may be best addressed by a sensory-focused intervention. Many occupational therapists who specialize in autism receive special training in this area.

It's common for children with ASD and anxiety to become extremely frightened in response to sensory stimuli. Perhaps – like many individuals with autism – your son also has difficulty telling you what's scaring him. Instead, he may show his fear with extreme avoidance of a situation.

8/4/2011

For example, he might refuse to go to school after a fire drill. He might become fearful of birthday parties after being frightened by a balloon that popped unexpectedly. Other signs of extreme distress can include yelling, crying, clinging and general agitation. Because your son may have difficulty communicating, it's important to observe his behavior for these signs of distress. This can help you determine what's triggering his fears.

Avoidance versus learning to cope

Many parents go to great pains to protect their children by avoiding agitating situations. This approach is sometimes appropriate and even necessary. However, it denies individuals the opportunity to learn how to manage anxiety-provoking situations on their own.

By helping your son learn to manage his fear, you can prepare him for an unpredictable world so that he can participate in it to the maximum extent possible.

Given the severity of your son's anxiety symptoms, I suggest that you seek professional support in addition to the strategies offered here. Families whose children have milder symptoms of anxiety can try these strategies on their own – seeking professional help if symptoms worsen.

Tackling one fear at a time

I suggest making a list of your child's major fears and worries. Try to rank order them from mild to severe. To encourage success, I'd start with a mild-to-moderate fear before taking on his extreme reaction to loud noises.

Key components of a cognitive behavioral approach include introducing coping strategies such as deep breathing and "helpful thoughts" that can help a person manage fearful reactions.

For example, you can teach your son to take deep slow breaths to help manage his body's physical anxiety reactions.

"Helpful thoughts" are statements that your son can say to himself when faced with a situation that makes him anxious. For example, you can coach to your son to say, "This is a loud noise. I don't like it, but I can handle it."

To help your son to learn these strategies, I suggest you model taking deep breaths while repeating a "helpful thought" out loud.

Graded exposure

The most important step is to help your son face his fears a little at a time. We call this "graded exposure." For example, explain to your son that the two of you are going to listen to a recording of thunder. The first time, you might play the recording at a soft volume, then gradually increase the volume over time as he demonstrates increased comfort with the sounds

Or you might try watching a video of a balloon pop – perhaps with the volume off the first time. Then he can watch a real balloon pop while standing some distance away. Over time, he can move closer and closer to the balloon.

After such exercises, you can present him with small rewards for being brave and "facing fears." Remember that even a small act of bravery – such as listening to a recording of thunder for 10 seconds – represents an important step toward handling fears. It deserves to be acknowledged.

Although graded exposure may seem counterintuitive, research indicates that this strategy is the single most effective strategy for getting over a particular fear.

I wish you and your son the very best. Please let us know how you're doing with an email to GotQuestions@autismspeaks.org.

60
Pages

Additional Resources & Tools

EXPERT
OPINION

[Help for Child with Autism & Recurring Behavioral Crises: Part 2](#)

EXPERT
OPINION

[Parents Seek Help for Son with Autism and Recurring Behavioral Crises](#)

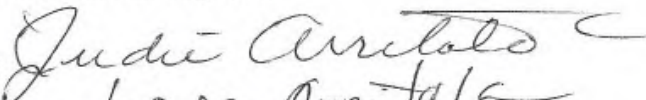


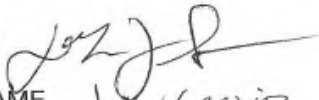
SCIENCE
NEWS


EXPERT
OPINION

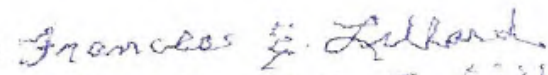
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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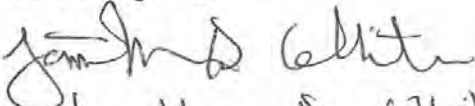
ADDRESS

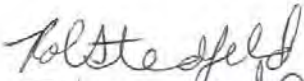
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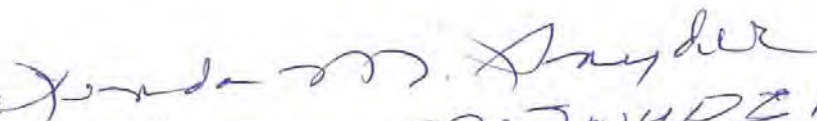
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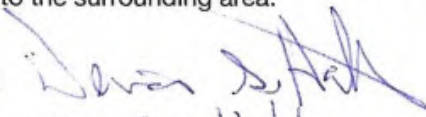
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SIGNATURE



PRINTED NAME

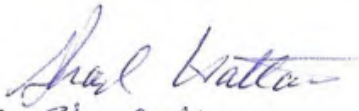
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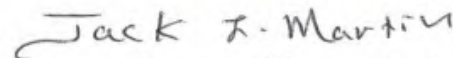
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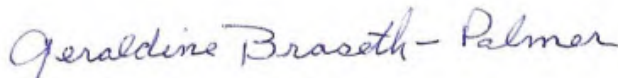
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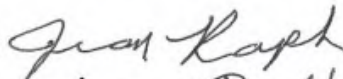
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Oregon Department of Energy and the Energy Facility Siting Council

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) Miriam Cecilia

Mailing Address (mandatory) 1705 First st.
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 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

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony
(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

I am not in support.



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Jay S. Chamberlin *owhee Irrigation District*

Mailing Address (mandatory) 422 Thunderegg Blvd.
Agassiz, OR 97913

Phone Number (optional) (541) 372-3540 Email Address (optional) oudh20@pmc.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:

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Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

COMMENTS OF JAY CHAMBERLIN, MANAGER
OWYHEE IRRIGATION DISTRICT

- Department of Energy needs to insure that tower placed between Mile Posts 255 through 258 are placed in consultation with Owyhee Irrigation District's staff in order to provide for good, high clearance and minimal structural interference with existing irrigation canals, structures, and roadways
- I would like to see the term "...and existing irrigation waterways" added after "protected areas" on Page 246 of the draft proposed order.
- The statement on Page 589 of the draft proposed order that a water right transfer is unnecessary, is inaccurate. The proposed Tower placements near Mile Post 255 on existing irrigated lands will require a water right transfer to allow the water rights for that portion of the land which will be used for the tower structures will have to be transferred off of that property and onto other property.

<p style="text-align: right;">Page 30</p> <p>1 Mr. Chamberlin, your name and your address and 2 then your comments. 3 MR. JAY CHAMBERLIN: Thank you. 4 My name is Jay Chamberlin. I'm general 5 manager of the Owyhee Irrigation District. My address 6 is 422 Thunderegg Boulevard, Nyssa, Oregon 97913. 7 I'd like to thank the Council for this 8 opportunity to hear our concerns. No. 1, the Department 9 of Energy needs to ensure that the tower placed between 10 mileposts 255 through 258 are placed in consultation 11 with the Owyhee Irrigation District's staff in order to 12 provide good, high clearance, and minimal structural 13 interference with existing irrigation canals, 14 structures, and roadways. 15 We would also like to see the term "...and 16 existing irrigation waterways" added after "protected 17 areas" on page 246 of the draft proposed order. 18 Also the statement on page 589 of the draft 19 proposed order that a water right transfer is 20 unnecessary is inaccurate. The proposed tower placement 21 near milepost 255 on existing irrigated lands will 22 require a water right transfer to allow that those water 23 rights be transferred to other portions of land, if 24 indeed that tower is placed there. 25 And other than that, I think we, as an</p>	<p style="text-align: right;">Page 32</p> <p>1 resources and people from one group of people to 2 another. 3 So I think one of the things that's happened 4 with this line is that it's kind of been a divide and 5 conquer thing where people who don't want this line to 6 happen, and actually there was a meeting in La Grande 7 with probably 400 people in the room, and when they were 8 asked, Does anyone support this line, no one did. But 9 people want, nobody wants to have to experience the 10 impact so they argue that it should hurt other things. 11 So we are not doing that. 12 Today I'm going to focus on just actually 13 about 25 pages of the draft proposed order, the section 14 regarding noise. And these are not all the issues but I 15 thought I would list some of them. I'm not going to 16 meet the standard to provide rules; I will give that to 17 you folks later in written testimony prior to the 18 July 23rd deadline. 19 But starting off, the Oregon standards allows 20 for more noise than is recommended by the World Health 21 Organization and the standard that is used in most other 22 countries. In Malheur County alone, there are 26 23 residences that are considered "noise sensitive 24 residences" within one-half mile of the transmission 25 line. That means that they will be subject to noise</p>
<p style="text-align: right;">Page 31</p> <p>1 irrigation district, have been part of the process all 2 along. It certainly isn't where we would like it to 3 see, but we have worked and we would certainly be 4 willing to continue to do such so that we can have as 5 least amount affected our waterways and transmission 6 systems ourselves as possible. 7 Thank you. 8 HEARING OFFICER WEBSTER: Thank you. 9 Following Ms. Gilbert we will hear Michael 10 Horton. 11 MS. IRENE GILBERT: Should I start? 12 HEARING OFFICER WEBSTER: Yes, please do, with 13 your name and your address, please. 14 MS. IRENE GILBERT: Irene Gilbert, 2310 Adams 15 Avenue, and I'm here representing myself but also 16 Friends of the Grande Ronde Valley, and I am a member of 17 Stop B2.H so I certainly hope my comments would be 18 considered coming from that group also. 19 A few things first is, in particular with the 20 B2H group, there are now over 500 members, as I 21 understand, individual members and multiple nonprofits 22 who are members of that group. And we are focused on 23 impacts to the entire route, along the entire route. So 24 Stop B2H has not said we prefer that you move the line 25 from here to there; it only moves the impacts on the</p>	<p style="text-align: right;">Page 33</p> <p>1 increases. Only a few of them actually exceed the 2 standards and the rest are ignored. The noise at 3 residences not exceeding the standard could increase by 4 up to 10 decibels. 5 Given that the Oregon Health Authority has 6 stated in their report regarding noise from wind 7 turbines that an increase of 3 decibels is perceived as 8 doubling the noise at a location. So as you can see, 9 there are a lot of people who are going to be 10 experiencing noise impacts that aren't being told that 11 that's going to happen. There's also documentation of 12 people actually exceeding the standard that are residing 13 more than a half mile from the proposed transmission 14 line. So there are a lot of people that don't know 15 what's going to happen here who will get a surprise. 16 There was no modeling of helicopter, road 17 legal vehicles or auxiliary equipment in establishing 18 the noise impacts, which is actually required in 19 modeling the impacts of this development in relation to 20 the 50 dBA noise limit. Idaho Power chose to ignore a 21 piece of the statute that requires that. 22 No modeling or inclusion of schools, churches, 23 hospitals or public libraries in the noise modeling. 24 That's also required. 25 No modeling of the entire site, including</p>

COMMENTS OF JAY CHAMBERLIN, MANAGER
OWYHEE IRRIGATION DISTRICT

- Department of Energy needs to insure that tower placed between Mile Posts 255 through 258 are placed in consultation with Owyhee Irrigation District's staff in order to provide for good, high clearance and minimal structural interference with existing irrigation canals, structures, and roadways
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August 14, 2019

Kellen Tardaewether, Senior Siting Analyst
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550 Capitol St N.E.
Salem, OR 97301

RE: Idaho Power Proposed Boardman to Hemingway Transmission Line

Dear Kellen:

I am the District Manager for the Owyhee Irrigation District. I am submitting these comments on behalf of Owyhee Irrigation District. I made verbal comments on the proposed transmission line at the Public Hearing on the matter on June 18, 2018, in Ontario, Oregon.

In my comments, I expressed concern over the proposed power line's crossing of the Owyhee River. Most of the public testimony at the hearing focused on this area. During the hearing, the Idaho Power representative stated that the proposed line placement was going in this area due to the fact that BLM in its final Environmental Impact Statement determined that this route was preferred over the alternative Malheur "S" route which was identified in the final EIS, but not chosen as the preferred route. The Malheur "S" alternative, however, was not completely eliminated as a possible alternative route in the EIS.

As the Energy Facility Siting Council heard at the Public Hearing in Ontario on June 18, the proposed crossing of the Owyhee River in this area has a substantial negative impact on not only the irrigation district, but also the private property landowners in that area.

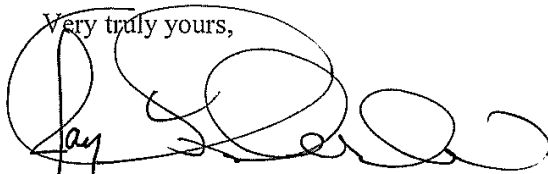
The Owyhee Irrigation District's elected Board of Directors strongly urges the Council to consider the Malheur "S" alternative identified on Map 2-7e in the final EIS. A copy of the map is attached. Another one of the preferred routes of the Owyhee Irrigation District is the Malheur "A" alternative, which is also shown on the attached map.

Both the Malheur "S" and Malheur "A" alternative routes are located along the edges of (within or closely parallel to) a west-wide energy corridor, within which is an existing 500-KV transmission line.

Kellen Tardaewether, Senior Siting Analyst
August 14, 2019
Page 2

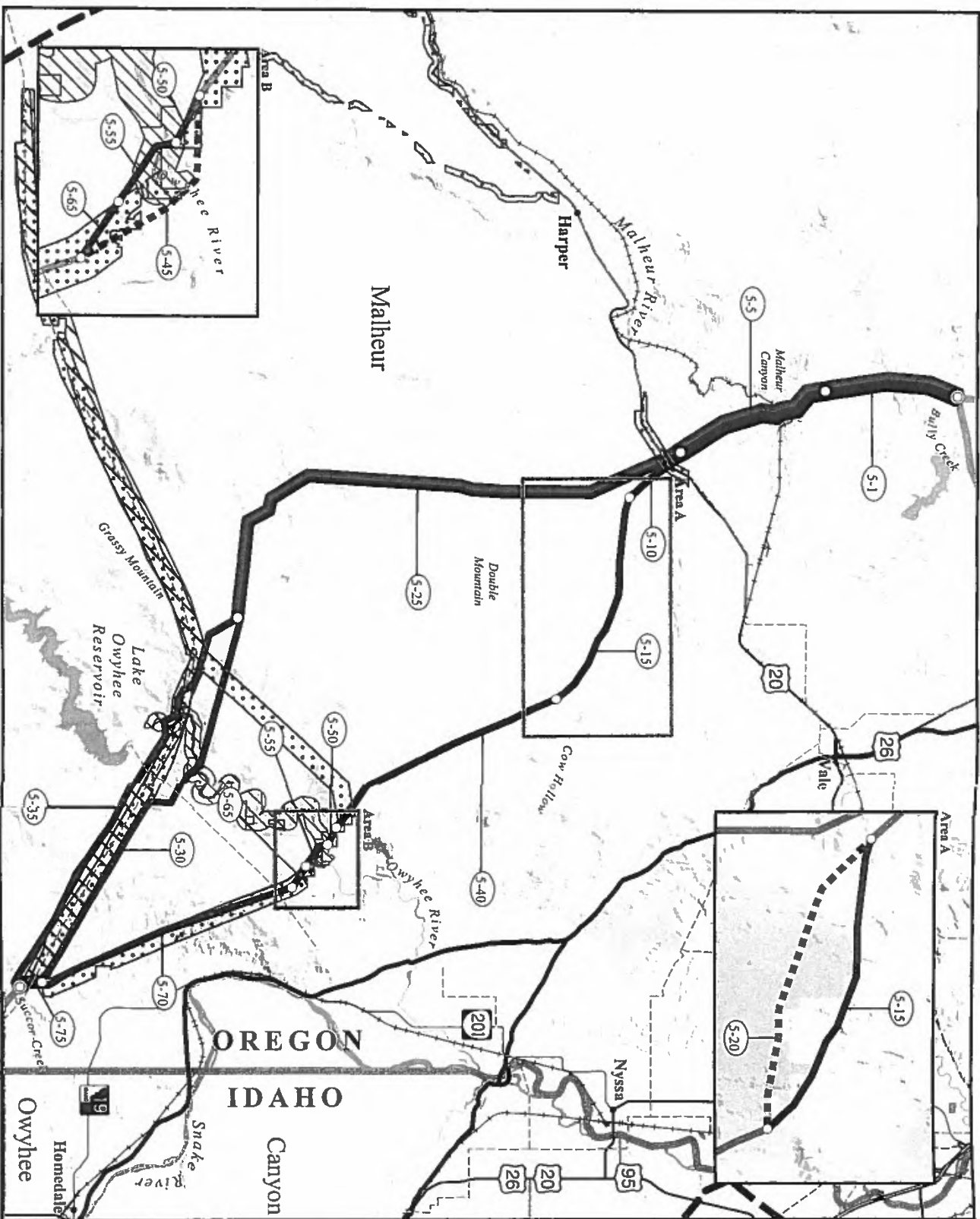
The proposed route near the Owyhee River creates potential problems with Bureau of Reclamation and Irrigation District facilities that the alternatives South and Malheur A alternative do not. The topography of the land east of the Owyhee River where the proposed route is to cross the Owyhee River is highly unstable. The construction and location of the proposed power line in that area could cause catastrophic loss of the Kingman Lateral resulting in possible flooding and damage to the proposed power line itself. The lateral has slid off of the mountain in this area before. If the power line were to be constructed in this area, substantial mitigation, including the possible piping of the Kingman Lateral would be required. This area also includes an access road to the North Canal of the Owyhee Project and the Kingman Lateral. This is an area of high activity for personnel and heavy equipment. The placement of the power line in this area will put not only the heavy equipment and personnel at risk, but also the power line.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay Chamberlin". The signature is written in a cursive style with a large, looping initial "J".

Jay Chamberlin,
District Manager

Encl.



Map 27e
 Segment 5
 Malheur

BOARDMAN TO HEMINGWAY
 TRANSMISSION LINE PROJECT

Alternative Routes^{1,2}

- Malheur A Alternative
- Applicant's Proposed Action Alternative
- Malheur S Alternative

Variations

- AREA A
- Variation S5-A1
- Variation S5-A2
- AREA B
- Variation S5-B1
- Variation S5-B2

Project Features

- ▭ Project Area Boundary
- Link Node
- Segment Node

Land Ownership

- ▭ Bureau of Land Management
- ▭ State Land
- ▭ Bureau of Reclamation
- ▭ Private Land

General Reference

- City or Town
- ▭ Resource Management Plan Utility Corridor
- ▭ West-wide Energy Corridor
- ▭ Wild and Scenic River- Determined Suitable
- ▭ 230-kV Transmission Line
- ▭ 69- to 115-kV Transmission Line
- ▭ Oregon National Historic Trail Congratulatory Designated Alignment
- ▭ U.S. Highway
- ▭ State Highway
- ▭ Lake or Reservoir
- ▭ State Boundary
- ▭ County Boundary
- ▭ Oregon National Historic Trail Congratulatory Designated Alignment
- ▭ Railroad

SOURCES

Land Jurisdiction, BLM 2014, 2015; Cities and Towns, ESR, 2013; Resource Management Plan Utility Corridor, BLM 2015; West-wide Energy Corridor, Argonne National Laboratory 2008; WRA and Scenic Rivers - Determined Suitable, BLM 2015; Transmission Line, Venty's 2012; Logan Simpson Design 2011; Bonneville Power Administration 2009; Bonneville Power Administration 2007; Bonneville Power Administration 2008; Oregon Department of Transportation, ESR 2013; Oregon Department of Transportation, ESR 2013; Oregon National Historic Trail Congratulatory Designated Alignment, BLM 2015

NOTES

Alternative routes are depicted graphically on map and, in most cases, where constructive alternatives exist, but not where variations are shown within the overall geographic context. The alternative routes shown on this map are draft and may be revised or refined throughout the development of the project.
 The B2H Project area boundary is defined by buffering the alternative route centerlines with a 100-foot buffer. The B2H Project area boundary is not intended to be used for regulatory purposes. Each alternative route is composed of links, which are discrete sections of the route sharing common endpoints determined by the point of intersection with other adjacent links. The common endpoint is referred to as a link node. Segment nodes are also determined from north to south. Segment nodes are determined by the point of intersection with other adjacent alternative routes; the common endpoint is referred to as a segment node.
 No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregation with other data. Original data were obtained from the Bureau of Land Management and are subject to change without notice.
 Alternative routes last revised: February 18, 2016
 Final EIS November 2016



August 14, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: 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:

Wendy Chamberlin

Mailing Address:

402 2nd St

Email:

La Grande, OR 97850

ps.17apple@yahoo.com

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

**APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN
THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT**

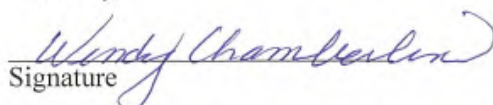
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,


Signature

Printed Name: Wendy Chamberlin
Mailing Address:

402 2nd St
La Grande, OR
97850

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS
AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing 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.

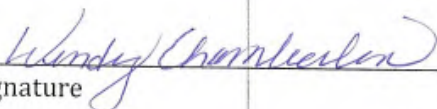
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming 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

Wendy Chamberlin
Printed Name

Mailing Address:

402 2nd St
La Grande, OR 97850

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I don't think 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.

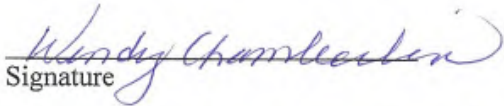
Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That's wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it's difficult to believe “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 addresser in a separate comment.


Signature

Name: Wendy Chamberlin

Address:
402 2nd St
La Grande, OR 97850

12 August 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

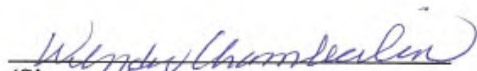
As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.


(Signature)

Name: Wendy Chamberlin

Address
402 2nd St
La Grande, OR
97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT
PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within 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.

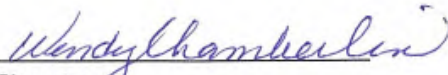
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related 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: Wendy Chamberlin

Mailing Address:

402 2nd St
La Grande, OR
97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

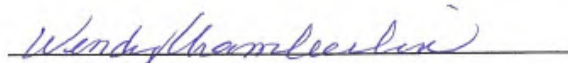
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,



Name: Wendy Chamberlin

Address: 403 2nd St
La Grande, OR. 97850

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

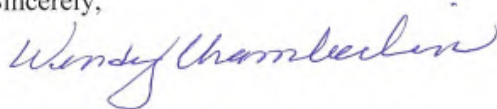
limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,



Name Wendy Chamberlin
Address 402 2nd St
La Grande, OR 97850

August 12, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council


I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous times in **Exhibit S** and the **Historic Properties Management Plan and Programmatic Agreement**. OCTA does NOT believe that Exhibit S Historic Properties Management Plan is complete in 7.2.3 Field Crew, and offers this additional condition.

ADDITIONAL CONDITION #1 OCTA recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. This Oregon Trail individual will have qualifications similar to Field crew members. For example, they will have an undergraduate degree in anthropology, archaeology, or in a field such as geology, engineering or history. It will not be necessary to have attended a field school. This individual will be recommended by the National OCTA President and agreed to by the Field Director.

The field surveys, even with SHPO and NPS data, have missed and/or mislabeled some sections of the emigrant trail. OCTA wants the public to know where the Trails are and I do too! OCTA over the years has marked the trail location with wooden signs, small triangles attached to trees, and more recently, carbonite posts and steel rails. Most private property owners are proud of the trail on their property, and after obtaining permission allow the public to walk and hike on the trail.

Idaho Power and their consultants have not acknowledged trail crossings shown on submitted Maps and do not acknowledge visual intrusion of the line for 10 miles per standards, and only upon ODOE's RAI's, put into documents some trail protections. This has been consistent from the BLM process to current day.

Considering the points above, Idaho Power does not comply with the state standards for cultural resources OAR 354-022-0090, or 345-022-0080, Scenic resources. **EFSC Must Deny the Site Certificate!**


Signature
Printed name: Wendy Chamberlin
Mailing address: 402 2nd St
LaGrande, OR 97850
Email address: ps.17apple@yahoo.com
phone number: (optional)
503-440-6530

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within 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: Wendy Chamberlin

Address:
402 2nd St.
La Grande, OR
97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) NORM CIMON

Mailing Address (mandatory) 1208 FIRST ST.
LA GRANDE, OR

Phone Number (optional) (541) 963-0053 Email Address (optional) _____

Today's Date: 6/20/2019

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

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1 established, and let's say they put access roads down
2 that right-of-way and use it.
3 In eastern Oregon, trespass elk hunting is a
4 big problem, and you want to lock your ground up so you
5 don't spread weeds or vandals. And some of these guys
6 are pretty ornery, to the point you need legal, just a
7 pack of sheriffs to deal with your problems, with a
8 person that is not going to cooperate if you ask them
9 nicely.
10 So I know OHV-ATV trails, they provide funding
11 for enforcement. I think there will have to be some
12 sort of follow-up in the mitigation plans to help
13 landowners to enforce the promises that Idaho Power
14 submits.
15 HEARING OFFICER WEBSTER: Before you leave,
16 can you repeat or spell the name of the invasive grass
17 that you --
18 MR. THOMAS THOMPSON: Ventenata dubia. If
19 it's not an amoeba, if it's not in the vegetation
20 management plan, it wasn't site specific enough. Not
21 only the power line and poles, but the access roads.
22 HEARING OFFICER WEBSTER: Thank you.
23 MR. NORM CIMON: My name is Norm Cimon,
24 C-i-m-o-n. I live at 1208 First Street. I'm a systems
25 analyst. I'm retired but I still have my own company.

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1 I have acted as a consultant for the Stop B2H group.
2 And I'm also a board member of the same organization
3 that Mr. Whitaker talked about, Oregon Rural Action.
4 I'd like to thank the Commission for making
5 their way to La Grande to listen to our concerns. And I
6 will be submitting a detail analysis of Exhibit H, the
7 geology and the soils.
8 I feel there is a weakness in the bonding,
9 that there is some substantial problems with the route
10 itself. I don't know that there is much choices. The
11 fact is that the bulk of the trail, or the route that
12 goes across the Blue Mountains goes right through severe
13 erosion potential. So I will be submitting all of that.
14 What I'd like to read into the record for the
15 future is something that I know a lot about, and I think
16 it's going to greatly impact the future. I think we
17 need to have this stuff in the record so that people can
18 look back, which is the age we are in now. We are
19 talking social media; we are talking the web.
20 Everything is public; there is no private stuff anymore.
21 The decisions are always going to be known, whatever
22 happens.
23 "An Overview: The electric grid, which has
24 remained in the same basic form for 100 years, is
25 changing very rapidly. The introduction of battery

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1 storage, smart meters, and smart inverters is reworking
2 the way that utilities participate in the marketplace.
3 The pace of that change will [only] accelerate..."
4 "The key points are as follows:
5 "Within 10 to 15 years much of the power on
6 the grid will come from widely distributed generating
7 sources.
8 "Many of these sources will be small to
9 moderately sized providers hosted through standalone
10 microgrids.
11 "Top-down control of those thousands of
12 emerging sources will no longer be viable."
13 You can't have tens of thousands of sources
14 managed the way we've been managing it. What we need is
15 something that looks a lot more like the Internet. That
16 is exactly what has been proposed by our research
17 organizations that are looking into this.
18 "The rules needed to provide robust management
19 for many of those sources will mimic those of the
20 Internet protocols which provide information from the
21 bottom up.
22 "Distributed generation will make the grid:
23 More reliable, more resilient, safer to operate."
24 That is all over the engineering journals. In
25 fact, large power grids tend to collapse, and there is

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1 no way to stop it. It's a huge argument going on in the
2 engineering community right now about just that. The
3 grid in a nutshell is chaotic. You cannot predict when
4 it's going to go down. Big stuff just makes it happen
5 more often and bigger.
6 "The paradigm shift will make much of the
7 high-voltage transmission system obsolete.
8 "That obsolescence will occur long before the
9 proposed 50 years of financing [for this project].
10 "The proposed Boardman to Hemingway 500kV
11 power line is unneeded. Idaho Power's own data clearly
12 shows that the utility's electric demand has been flat"
13 [from 2007 to 2016]."
14 And that's because even with population growth
15 we are seeing efficiencies, we are seeing conservation,
16 and we are seeing renewables. So it's all changing
17 very, very quickly.
18 "The existing grid will be eclipsed by a
19 decentralized system. High-voltage, long-distance power
20 lines will be increasingly underutilized. Moreover,
21 such lines are inherently unstable and dangerous. They
22 are fire hazards in arid, semi-arid, and forested
23 environments -- the ecosystems along any proposed route
24 for the line in eastern Oregon."
25 Everything we have around us is fire prone.

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1 In fact, the vegetation literally needs to burn to
2 regenerate.
3 "The line will be an economic burden, enabled
4 by an out-of-date business model with increasing risk
5 and decreasing financial viability. An economist and
6 ex-president of the 'Society for Risk Analysis'" -- some
7 of these actually brought in by utilities -- "had this
8 to say about billion dollar investments such as this
9 one:
10 "If you were silly enough to think about
11 investing in transmission, we would tell you that we
12 don't have any idea how you're going to get reimbursed
13 or how much you are going to get reimbursed.
14 "The guaranteed rate-of-return offered up to
15 regulated utilities places that financial burden
16 squarely on the backs of ratepayers, removing money from
17 their pockets and" -- it takes it right out of the local
18 economies. That is what funding this thing will do, in
19 my opinion, because it's going to be obsolete long
20 before that 50-year financing lifespan. This provides
21 context for what I will be writing up.
22 So you have a very difficult decision in front
23 of you. These paradigm shifts are difficult, I will not
24 kid you, but that's exactly what's going on, and we are
25 starting to see it now accelerate.

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1 We had a congressman from Idaho just propose
2 that all the dams in the Snake River be taken down. The
3 BPA -- I'm on the Grande Ronde Model Watershed Board,
4 and I'm not speaking for them. BPA approached us and
5 told us that they expect that in the next cycle of
6 planning for the power distribution to the co-ops and
7 PUDs, we had them tell us quite clearly they expect a
8 lot of them are going to walk out the door. That's
9 because the power is getting cheaper from renewables.
10 What's going to happen then is the cycle where
11 the people who are -- organizations, utilities that are
12 left on the grid, the BPA grid, will simply be charged
13 more, which means more of them will walk out, which
14 means the others will be charged more. That kind of
15 vicious cycle can just blow organizations apart.
16 So there is great concern amongst the
17 congressional delegations and also amongst the power
18 plants in the Northwest.
19 Thank you very much and good luck with your
20 decision. It's a tough one.
21 HEARING OFFICER WEBSTER: Thank you.
22 MR. RYAN BROWN: My name is Ryan Brown. I'm a
23 resident of La Grande, and I represent seven generations
24 of the Webster property, which looking west from
25 La Grande is the horizon that you see.

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1 If you could imagine for a brief moment an 8th
2 grade me, getting dropped off near Table Mountain and
3 walking the Oregon Trail from Table Mountain to Hilgard
4 State Park. A popular kid, I guess, too good for
5 walking the Oregon Trail. I didn't listen, didn't pay
6 much attention.
7 Fast forward, and unbeknownst to me, I married
8 a gal that is a granddaughter of the person that owns
9 the trail I walked or the property in which the Oregon
10 Trail sits. So now I'm here today.
11 So as a person who helps out, caretake for
12 this property, my wife and I, we became aware of the B2H
13 power line about, around 2015, give or take.
14 Fast forward a little ways, we ended up having
15 a meeting with some gentlemen in the back of the room
16 here from Idaho Power. I asked the question of why is
17 it that we are just now being made aware of this when
18 it's been in the works for some time. And basically
19 they didn't have an answer for it.
20 Well, unbeknownst to these guys, I was aware
21 of a lot of the reasons why, and the reason why is
22 money. If we can't talk about the Glass Hill route,
23 apparently it's taboo, but it run into a lot of
24 litigation, I get it.
25 So I know we can't take that into account, but

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1 I was told that the comment period for the proposed
2 route and the alternative route had passed. Well, the
3 comment period for that was before we ever received the
4 letter.
5 So my question to the gentlemen in the back
6 was: What happens if the poles that go in devastate the
7 property so much that we lose our water? There are
8 three springs on the property, all of which are within
9 200 or less feet of proposed towers. If we lose those
10 three springs, our property is no longer workable.
11 When I asked them this question, and much like
12 in the ORS, the burden is on us as landowners. We have
13 to prove by paying somebody, we aren't going to do it
14 ourselves, but paying somebody professional to calculate
15 the flow of water and present what damage has been done.
16 Does that make any sense? After it's gone in we have to
17 prove. Is that backwards? Guilty until proven innocent
18 in our society; right?
19 So fast forward a little bit more, we allowed
20 surveyors from Idaho Power, contracted surveyors, and
21 they walked right over the Oregon Trail; they didn't
22 even know it existed.
23 I encourage you to listen to these people. We
24 are not attorneys, we are not going to comb through
25 thousands of papers. We don't have the time, it's

Wade Cimow

Overview

The electric grid, which has remained in the same basic form for 100 years, is changing very rapidly. The introduction of battery storage, smart meters, and [smart inverters](#) is reworking the way that utilities participate in the market place. The pace of that change will accelerate very quickly.

The key points are as follows:

- Within ten to fifteen years much of the power on the grid will come from widely distributed generating sources
- Many of those sources will be small to moderately sized providers hosted through [standalone microgrids](#)
- Top-down control of those thousands of emerging sources will no longer be viable
- A different grid with digitally managed locally sourced **ENERGY IS EMERGING**
- The rules needed to provide robust management for many of those sources will mimic those of the internet protocols which provide information from the bottom up
- Distributed generation will make the grid
 - More reliable
 - More resilient
 - Safer to operate
- The paradigm shift will make much of the high-voltage transmission system obsolete
- That obsolescence will occur long before the proposed 50 years of financing

The proposed Boardman to Hemingway 500KV power line is unneeded¹. Idaho Power's own data clearly shows that the utility's electric demand has been flat for ten years. Population growth in their service area has been completely matched by conservation, more efficient appliances and equipment, and by the rapid rise of renewable energy (Figure 1).

¹ [A recent article in Forbes](#) about Green Mountain Power and its CEO Mary Powell drives this home:

"It's a completely underutilized grid that's getting worse by the minute. You are taking this completely uneconomically inefficient system and doubling down on infrastructure investment...The U.S. spent \$10 billion last year on infrastructure, while we have at the same time technologies that allow customers to become more energy independent."

The challenge is to avoid what Powell refers to as "financial Armageddon," the dreaded 'death spiral' in which customers deploy increasingly efficient energy-consuming technologies while installing solar panels on their rooftops and batteries on-site. This reduces overall consumption and revenue, leading to higher rates that in turn stimulate more customer and load defection. Powell indicates that the best response to this dynamic is to change the relationship with the customer, to think about other ways of serving the customer's energy needs and moving beyond supply and delivery of electrons.

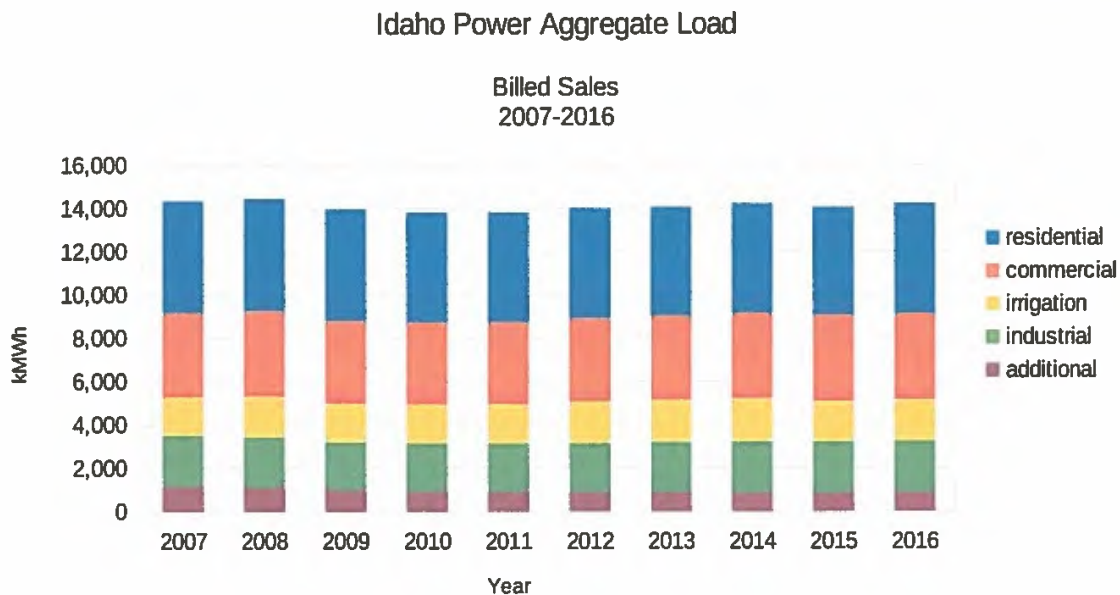


Figure 1: Electric demand in the Idaho Power service area

The existing grid will be eclipsed by a decentralized system. High-voltage long-distance power lines will be increasingly underutilized. Moreover, such lines are inherently unstable and dangerous. They are fire hazards in arid, semi-arid, and forested environments — the ecosystems along any proposed route for the line in Eastern Oregon. Utilities will be safer, more robust, and more resilient with distributed generation.

The line will be an economic burden, enabled by an out-of-date business model with increasing risk and decreasing financial viability. An economist and ex-president of the *Society for Risk Analysis* had this to say about billion dollar investments such as this one:

“If you were silly enough to think about investing in transmission, we would tell you that we don’t have any idea how you’re going to get reimbursed or how much you’re going to get reimbursed,” ~ Lester Lave

The guaranteed rate-of-return offered up to regulated utilities places that financial burden squarely on the backs of ratepayers, removing money from their pockets and from the local economies they power.

This provides context for my analysis of Exhibit H of the Idaho Power application.

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for 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.

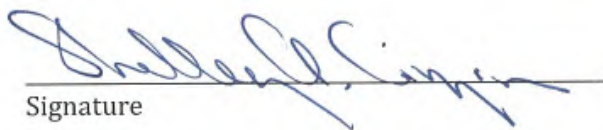
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming 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.

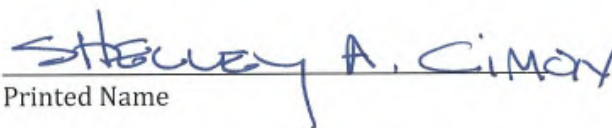
In summary:

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:

1208 First St
LA GRANDE, OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

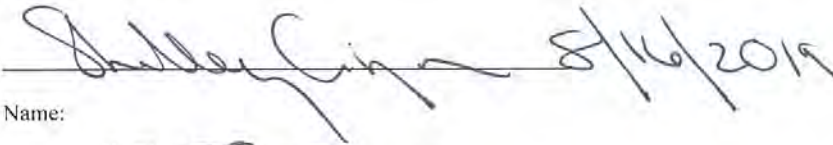
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,

 8/16/2019

Name:

Address: 1208 First St.
La Grande, OR. 97850

July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes**
345-022-0020

(c) ...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states *“The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.”* Idaho Power Corporation admits in ASC page B-12 that *“The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges.” IPCs stated original intention to the EFSC was the following: “Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,

 Shouay A Simpson
Signature Printed Name:

Mailing Address: 1208 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.

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.

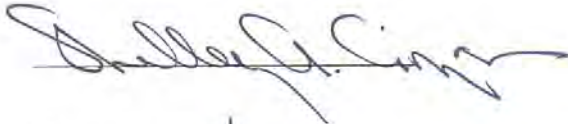
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire 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,



Name: Stelley A. Cimon

Address: 1208 First St
LA GRANDE, OR
97850

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I 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 ASCand DPO which will be addressed in a separate comment.



Signature

Name: Sheway A. Simon

Address: 1208 First St,
La Grande, OR
97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within 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: Stewey A. Simon

Mailing Address:

1200 FIRST ST.
LA GRANDE, OR
97850

12 August 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within 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: Stacey A. Ciment

Address: 1208 First St,
La Grande, OR
97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

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:

SHWEY A. CIMON
1208 FIRST ST
LA GRANDE, OR
97850

ESTERSON Sarah * ODOE

From: Judy Mittenthal <tjlranch@gmail.com>
Sent: Thursday, August 22, 2019 9:47 AM
To: B2H DPOComments * ODOE
Subject: B2H Transmission Line in Pilot Rock
Attachments: B2H Blasting Concerns V.pdf; B2H Raptor Neset Concern V.pdf; B2H Noxious Weed Concern V.pdf

Attached are several letters voicing my concerns along with the total disregard of our property.

Vera Clarke

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 22, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

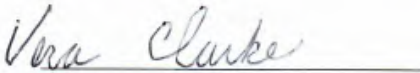
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,



Name: Vera Clarke

Address: PO Box K, Pilot Rock, OR 97868

August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301
Kellen.Tardaewether@oregon.gov

Subject: Idaho Power Amended Application for the Boardman to Hemingway Transmission Project dated 9/28/2018; Draft Proposed Order dated 5/23/2019

Dear Chair Beyeler and Members of the Council;

Thank you for the opportunity to comment on the Draft Proposed Order for Idaho Power's B2H project.

IPC's "Noxious Weed Plan" fails to take responsibility for spreading noxious weeds in several alarming ways. Here is an excerpt from their Plan (Monitoring 6.1):

As stated above, noxious weed monitoring and control will occur during the first 5-year period. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will conclude that it has no further obligation to monitor and control noxious weeds in that area of the Project. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, or may request a waiver from further noxious weed obligations at these sites.

To start with, the landowner or occupant of land in this case, is required by law to control weeds in perpetuity—not just for 5 years! TO say that IPC "has no further obligation" and can "request a waiver" is in blatant disregard to the law.

From Chapter 569 of Oregon law (https://www.oregonlegislature.gov/bills_laws/ors/ors569.html):

569.180 Noxious weeds as public nuisance; policy. *In recognition of the imminent and continuous threat to natural resources, watershed health, livestock, wildlife, land and agricultural products of this state, and in recognition of the widespread infestations and potential infestations of noxious weeds throughout this state, noxious weeds are declared to be a public nuisance and shall be detected, controlled and, where feasible, eradicated on all lands in this state. It is declared to be the policy of this state that priority shall be given first to the prevention of new infestations of noxious weeds and then to the control and, where feasible, eradication of noxious weeds in infested areas. [Formerly 452.615]*

569.390 Owner or occupant to eradicate weeds. *Each person, firm or corporation owning or occupying land within the district shall destroy or prevent the seeding on such land of any noxious weed within the meaning of ORS 569.360 to 569.495 in accordance with the declaration of the county court and by the use of the best means at hand and within a time declared reasonable and set by the court, except that no weed declared noxious shall be permitted to produce seed.*

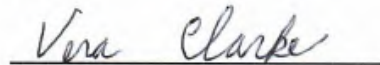
Secondly, IPC flagrantly flaunts Oregon law by proposing to treat only Class "A" and "T" (a rotating list of weeds for focused treatments in a given year) weeds- ignoring the majority of weed species. Class A weeds are mainly agricultural weeds and weeds which an entity (County or State) believes they have the best chance of controlling i.e. known patches are few in that area. Class B and C weeds are generally the worst weeds, spreading most aggressively and to more areas, thus threatening and ultimately devastating the most native habitat. Why should Idaho Power be exempt from responsibility for the FULL list of weeds? This is absolutely awful proposition, but especially awful for Union County, where 81% of the land that would be wrecked by the B2H project is private land. Putting the route through federal lands, IPC at least gives a nod to Agency (BLM or USFS) rules for weeds. On private lands in Union County, several of the landowners in on "Proposed" or "Morgan Lake Alternative" routes have labored for years, even decades, to control weeds and maintain native habitats. Case in point are Joel Rice and the City of La Grande (Morgan Lake Park). Now Idaho Power comes along to trash these natural areas. The B2H project is set to become a conduit for the worst noxious weed species to be injected into some of the best native habitat in our County.

"B2H Noxious Weed Plan Comments" is a document collated by weed supervisor Brian Clapp of Union County after a meeting of Morrow, Umatilla, and Union counties, Oregon Dept. of Ag and Tri-County CWMA on August 22, 2017 to go over the B2H Attachment P1-5 Noxious Weed Plan. These comments reflect some of my concerns about weeds. I find it nearly unbelievable the Comments by weed managers are NOT acknowledged in IPC's Plan, published over a year later!

To top the travesty of IPC's "Noxious Weed Plan" the Plan states they are not responsible for "areas outside of the ROW". The weed sites immediately outside areas of potential disturbance are definitely going to spread to disturbed areas --but would not even be recorded! Noxious weeds would explode near the ROW, ruining native habitat, trashing decades of work by landowners, and with no accountability by IPC. IPC is proposing a huge area of disturbance; their responsibility should not be limited to the ROW.

I urge you to strongly deny IPC's B2H Application. IPC's "Noxious Weed Plan" does not comply with Oregon law. They deny responsibility for control of most weed species, deny responsibility for weed control after 5 years, control weeds only once a year, and give themselves a waiver when control fails. EFSC should reject the Weed Plan and Application.

Sincerely,



Name: Vera Clarke
Address: PO Box K, Pilot Rock, OR 97868

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

August 22, 2019

SETBACKS FROM RAPTOR NEST SITES

A 0.5 mile setback area around all sensitive raptor nests which includes all permanent and temporary disturbances associated with the proposed project is necessary to meet the requirement that the project not result in adverse population-level impacts to these species.

The Applicant identifies Category 1 Habitat for nest sites of golden eagle, Swainson's Hawk, goshawk, and burrowing owl. However, the applicant considers these point habitats with no associated range. While this approach is convenient, it is inconsistent with historical regulatory measures (e.g. forestry practices) regarding sensitive and threatened and endangered wildlife species in Oregon. In the Columbia Basin, Category 1 habitat associated with Washington ground squirrel colonies were defined as being occupied area AND its associated use area. The area around a natal site is integral to the continued use of the site. Wildlife need more than a specific point to be successful. ODFW has previously recommended a ½ mile setback (no impact) around all sensitive raptor nest sites. This buffer needs to include all permanent and temporary disturbances associated with the proposed project. The applicant has provided no population data for the potentially affected raptor species—especially the low density raptors (e.g. burrowing owls, goshawk and golden eagle) to show that the impacts to these species are sustainable to local populations of these species.

The current application fails to provide information necessary to determine habitat Category. Absent information that will identify the location of Category 1 habitat, it is not possible to issue a site certificate that provides that no Category 1 habitat will be impacted directly or indirectly by the development. This precludes a determination that the developer is able to site the transmission line in compliance with OARs 345-022-0060.

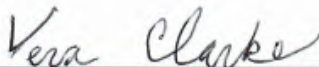
According to USFWS 501 FW 2, Appendix 2, the following information is necessary in order to determine habitat category determinations.

(2) "Identify those special biological features or the area(s) in question that are considered pertinent to the resource category determination (i.e. species, species life stages, species life requisites, species groups and species diversity considerations). Also identify any special vegetative and physical site conditions that enter into consideration."

(3) "In quantitative or qualitative terms, discuss the importance ascribed to the special features and conditions in number 2 above."

(4) "As appropriate, discuss considerations for scarcity, abundance, irreplaceability, and/or uniqueness. Also discuss the geographic area of consideration associated with these characteristics."

Reference: 501 FW 2, Appendix 2 Checklist-Resource Category Documentation



Signature

Printed Name: Vera Clarke

Address: PO Box K, Pilot Rock, OR 97868



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Terry L. Clarke

Mailing Address (mandatory) 1325 NW Horn
Pendleton, OR 97801

Phone Number (optional) () _____ Email Address (optional) terry@pianceasphaltinc.com

Today's Date: 8/26/19

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

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Page 62

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

Page 64

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

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1 road on the property, but not so much. It's like
2 unpredictable to say that any road up there as a
3 permanent access would do that property any good at all.
4 And if it winds up that way, I would want to be
5 compensated for the upkeep of the road and the
6 preparation to keep it from turning into a complete
7 runoff thing, or someone should be responsible for the
8 terrain.
9 HEARING OFFICER WEBSTER: Thank you.
10 MR. ED MILTENBERGER: That's about it.
11 HEARING OFFICER WEBSTER: It's 7:32 and we are
12 back in recess.
13 (Recess taken.)
14 HEARING OFFICER WEBSTER: We are reconvening
15 again. We have another member of the public who wants
16 the opportunity to comment. It is 7:50. We are going
17 to hear from Terry L. Clarke.
18 HEARING OFFICER WEBSTER: If you would state
19 your name and your address for the record.
20 MR. TERRY L. CLARKE: I'm Terry L. Clarke,
21 1325 Northwest Horn, Pendleton, Oregon.
22 I also represent TJL Ranch, one of the
23 properties impacted by this proposed line.
24 So what I wanted to get on the record is that
25 we object to this, the construction of this line,

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1 especially as it pertains to shipping power out of
2 state. It's been our feeling that the Oregonians have
3 paid for part of this project, for the construction of
4 the windmills with our tax credits and all the incentive
5 programs that we have had, and in doing so, I think we
6 are short-circuiting ourselves. We have got a lot of
7 new industry in the area with Amazon and what is
8 happening with the ports, I think that power can be used
9 here.

10 I think if the Siting Council allowed the
11 construction of those windmills originally with the onus
12 that there was adequate transmission lines in the area
13 to take care of those, then the mistake is either then
14 in allowing them to be constructed or now in allowing
15 the power to be removed from the area. So I think this
16 power belongs to Oregonians first.

17 As far as the impact to our properties, we see
18 it's a grazing area that we've had for over -- we've
19 been there over 50 years. The property has been used
20 for grazing forever. I think the impact, allowing
21 additional people and structure in the area has a
22 negative impact to us, both from the view scape as well
23 as the use of the property. I don't think all of the
24 impacts have been properly addressed at this point.

25 If someone could show us in the future that

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1 all the environmental concerns would be addressed and
2 that we could maintain our view scape without any kind
3 of adverse impact, then we might consider it. But at
4 this point we wish to go on the record as objecting.

5 HEARING OFFICER WEBSTER: All right. Thank
6 you.

7 MR. TERRY L. CLARKE: You are welcome.

8 HEARING OFFICER WEBSTER: There is no Council
9 members here to ask questions; so I think we will
10 just -- is there anything else you want to add?

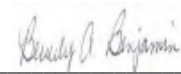
11 MR. TYLER L. CLARK: No. I just am really
12 concerned with in siting these originally, because
13 windmills are so localized. There is wind in Idaho,
14 there is wind in Washington, there is wind everywhere.
15 Why would we build them here to take transmission lines
16 to go 200 miles east to tie to something else. It
17 doesn't make any sense. The windmills could have been
18 there. They could have saved billions of dollars. This
19 wouldn't even be an issue.

20 HEARING OFFICER WEBSTER: Mr. Clarke, thank
21 you.

22 MR. TERRY L. CLARK: You are welcome.
23 (Hearing concluded at 7:54 p.m.)
24
25

REPORTER'S CERTIFICATE

1
2 I, BEVERLY A. BENJAMIN, CSR No. 710, Certified
3 **Shorthand Reporter, certify:**
4 That the foregoing proceedings were taken before
5 me at the time and place therein set forth;
6 That the testimony and all objections made were
7 recorded stenographically by me and transcribed by me or
8 under my direction;
9 That the foregoing is a true and correct record
10 of all testimony given, to the best of my ability;
11 I further certify that I am not a relative or
12 employee of any attorney or party, nor am I financially
13 interested in the action.
14 IN WITNESS WHEREOF, I set my hand and seal this
15 10th day of July 2019.
16
17
18
19
20
21
22
23
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25



BEVERLY A. BENJAMIN, CSR 710
Notary Public
P.O. Box 2636
Boise, Idaho 83701-2636

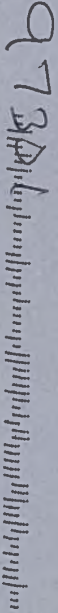
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La Grande, OR 97850

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Energy Facility Siting Counsel
Attn: V. Tardewier
Oregon Dept. of Energy
550 Capitol St., NE
Salem OR

97301-374299



RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

August 10, 2019

Energy Facilities Siting Council
Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Vial EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

Regarding the Boardman to Hemingway Transmission Project, the monitoring of noise to establish baseline noise levels failed to comply with the requirements of OAR 340-035-0035(3)(b). This rule establishes the location and procedure for completing sound measurements as listed in the Sound Measurement Procedures Manual 1. The location is specifically described as the further point from the noise source between a point 25 feet toward the noise source from the noise sensitive building or the point on the property line nearest the noise source.

Idaho Power ignored the specific procedural requirements for establishing a baseline noise level in several ways:

1. They placed measuring points “representative of the house and yard accommodations.” Measuring points were placed “in similar surroundings experiencing the same weather and acoustic conditions of where a resident was expected to spend the majority of time when outdoors,” or they were placed to accommodate the homeowner’s request. (See 3.2, Page 7 of Attachment X-2, Baseline Sound Survey) The procedure for doing noise monitoring to establish baseline very specifically defines where the monitoring equipment is to be placed in relation to the noise sensitive property. Note that on Page 549, line 16 through 24 of the Draft Proposed Order states that the monitoring positions were 25 feet toward the source. This is not what the developer says. In fact, by changing the measurement point or using measurements from one residence to assume sound level at others makes all the measurements invalid that was not performed at the stated location for each residence. On page 7 of the Attachment X-3, Supplemental Baseline Sound Survey for the Tub Mountain, Burnt River, and East of Bombing Range Road Alternate Corridors, the developer states, “MPs were placed in similar surroundings experiencing the same weather and acoustic conditions to where a resident was expected to spend the majority of time when outdoors. However, some property owners voiced opinions and preferences on the exact locations of the MP on their properties.” No reliable results can be obtained when the individual(s) doing the monitoring do not adhere to the strict protocol used to complete the monitoring.
2. When modeling results showed a “potential for increasing sound levels by 10 dBA or less,” the developer assumed compliance with the ambient degradation standard and did not complete testing to determine baseline sound levels. (Page 5, Line 24 of Attachment X-2, Baseline Sound Survey) This did not provide for any margin of error as any level over 10 dBA would be an exceedance of the standard. The developer failed to apply a reasonable margin of error, which would have resulted in doing measurements for any residence predicted to have an increased sound level of 8 dBA to allow for 95% reliability. See attachment “Uncertainty of L_{DEN} Calculation for corona noise from Ultra High Voltage power lines using reference methods” by T. Wszolek, AGH University of Science and Technology, Department of Mechanics and Vibroacoustics. September 30, 2006.

3. The practice of using a baseline sound measurement at a single monitoring point to represent a group of nearby noise sensitive properties is unacceptable. The developer stated that "due to the large number of NSRs identified within the analysis area, it was not feasible to conduct baseline monitoring at every individual noise sensitive property." (Page 5, Line 36, Attachment X-2, Baseline Sound Survey.) The noise rules do not require noise monitoring. They do state the methods that are to be used to establish baseline noise levels in the event the developer chooses to do actual noise measurements. The developer had the option and could have taken it to use the standard assumed 26 dBA for any noise sensitive property they were not able to monitor per the prescribed methods for any reason.
4. The only monitoring results which should have been used to establish a baseline noise level other than the standard should have been the 22 measuring points which performed during the entire monitoring period, assuming they were placed at a location as described in OAR 340-035-0035(3)(b). Locations, where baseline modeling was not completed per the DEQ protocol, need to use the assumed baseline sound measurement. Instead, the developer used the measurements from one residence to establish what they thought it would be at another; they averaged the results from MP 13 and MP 16 to guess at the measurement at MO 15. These MP's were located roughly 5 miles in different directions from MP 13 and MP 16. See description on page 8, lines 17 through 26, Attachment X-2, Baseline Sound Survey, for an example of the shoddy methods used to complete the monitoring, which clearly would not hold up under peer review.
5. While the developer makes several references to the methodology used in the Big Eddy Knight transmission line EIS, the final outcome regarding noise was that the developer would not be allowed to exceed the noise standard.

Idaho Power failed to follow the methodology for establishing a baseline noise level required by OAR 340-035-0035 or use the assumed baseline noise level resulting in the establishment of flawed baseline noise levels. None of the results of the noise modeling can be assumed to be accurate as a result. All material needs to be corrected and resubmitted.

No site certificate can be issued due to the lack of compliance with the noise monitoring protocol.

Sincerely,



Signature

Printed Name: Karen Cloy

Mailing Address: 904 I Ave
La Grande OR 97850

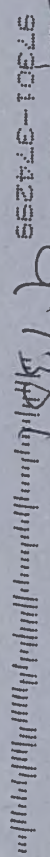
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Energy Facility Siting Counsel
Attn: V. Tardewier
Oregon Dept. of Energy
550 Capital St., NE
Salem OR 97301-374299

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AUG 19 2019
DEPARTMENT OF ENERGY



August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,


Signature

Printed Name:
Mailing Address:

Steve Cloud
910 12th St
La Grange OR 97850

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project (B2H) 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

This letter is a public comment for the above referenced project. Specifically, this letter will discuss Idaho Power's compliance with Standard 345-022-0110 - Public Services, in Exhibit U (3.5.6.2 and 3.5.6.5) of the EFSC application for B2H to ODOE. The letter will discuss the impact potential wildfires caused by the B2H transmission line will have on the ability of public and private providers within the analysis area to provide fire protection.

The effect of transmission lines on wildfire impact in western states has been well documented. In California, PG&E lines have caused 5 of the 10 most destructive fires since 2015, producing a liability of over 30 billion for PG&E. When considering the impact of B2H's operation, residents of Union County find the similarities between La Grande and Paradise California, where the infamous Camp Fire struck in 2018, deeply concerning. La Grande and Paradise share similar elevations and populations, however, La Grande has several characteristics that make it significantly more vulnerable to the ravages of wildfire than Paradise. For instance, La Grande averages 18 inches of rain yearly while Paradise enjoys 55 inches. Additionally, the proposed line runs adjacent to La Grande, while the line causing the Camp Fire was 7 miles from Paradise. *Oregon's 2006 Communities at Risk Assessment* by the Oregon Department of Forestry cites a startling fact: **The fire risk of the wildland urban interface (WUI) in La Grande has been rated the #1 WUI fire risk in Oregon!**

There is no doubt that construction of the proposed B2H transmission line would significantly increase the risk of wildfire in our area. From Idaho Power's own Draft Protection Order (Exhibit U-3.5.6.2, p. U-24): "Most activities will occur during summer when the weather is hot and dry. Much of the proposed construction will occur in grassland and shrub-dominated landscapes where the potential for naturally occurring fire is high. Project construction-related activities, including the use of vehicles, chainsaws, and other motorized equipment, will likely increase this potential risk in some areas within the Site Boundary. Fire hazards can also be related to workers smoking, refueling, and operating vehicles and other equipment off roadways. Welding on broken construction equipment could also potentially result in the combustion of native materials near the welding site." Idaho Power recognizes this hazard but makes no consideration of it in its application.

There are several specifics to examine in an analysis of the proposed B2H line's effects on Union County's ability to provide fire protection services. Firstly, firefighting crews in our region are

limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's application "volunteer fire departments (rural fire protection districts) have a hard time finding volunteers due to budget constraints, similarly to budget constraints at the state and federal level. The wildland fires are getting bigger and cost more to fight" (U-1C-6). Fire crews in Union County are not equipped to handle potential wildfires generated by the proposed B2H transmission line.

The fact that fire crews are unstable, small and volunteer affects many aspects of their ability to respond to wildfires. Delayed response times, as noted in the quote from the previous paragraph, is one effect. Estimates of response time in the EFSC application are best-case scenarios. The estimate of 4 to 8 minutes as the response time in Union County (Table U-10) is far from even a best-case scenario (p. U-17). Residents that live on Morgan Lake Road concur that driving time is at least 10-15 minutes to the most accessible areas of the line from the base of Morgan Lake Road. Add to this estimate travel time from the La Grande Fire Station (approximately 7 minutes) and the time needed for individual fire fighters to travel to the Fire Station for a more realistic best-case scenario response time. The Paradise Camp Fire burned at a rate of over 1 acre per second!

Another factor in transmission line fires particularly impactful for small volunteer fire departments is the complications to firefighting introduced by the transmission lines themselves. According to Marvin Vetter, ODOF's Rangeland Coordinator, "local crews have no training in this scenario and will wait for the lines to be de-energized." JB Brock, Union County Emergency Manager, states, "The project (transmission line) could limit the ability on initial attack if fire fighters have to wait for power lines to be de-energized." (U-1C-6) These delays allow fires to grow even more.

How can communities struggling to maintain volunteer fire crews hope to address the overwhelming additional challenges and risks imposed by a project such as the B2H transmission line? Where is this addressed in Idaho Power's application and how can Idaho Power conclude that the proposed B2H transmission line is "not expected to have significant adverse impacts on fire protections services" (Exhibit U 3.5.6.2)? Considering the current capacities of fire protection services in Union County and the additional risks of wildfire imposed by the B2H transmission line, I urge you to act in accordance with state statute OAR 345-022-0110 and reject Idaho Power's application to construct the Boardman to Hemingway transmission line.

Sincerely,



Name *Anna Collins*
Address *806 Washington Ave
La Grande OR 97850*

E.2 Landslide Descriptions

E.2.4 SLIDO 10; Sheet 6

"SLIDO 10 is referenced at a scale of 1:100,000 (Buss, 2006), and it's located over 2,000 feet southwest of the IPC Proposed Route, near tower 96/3. It is mapped as talus/colluvium and will not likely impact the proposed alignment or any associated work areas or multi-use areas. A field reconnaissance of this area should be performed as part of the geotechnical exploration program."

Idaho Power Corporation, in Exhibit H 2.2.4 states *"The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard."*

Idaho Power Corporation admits in ASC page B-12 that *"The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes presenting design and construction challenges."*

IPCs stated original intention to the EFSC was the following: *"Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line."*

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the Winter storms and the Spring melt can be precipitous and unpredictable.

The area surrounding **Drill sites 96/4; 96/5; 97/1** is within a mile of the heavily traveled I84 transportation/utility corridor. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site Drill sites 96/4; 96/5; 97/1, and its vicinity, represent a significant risk of several possible adverse effects. This area characterized by steep slopes and hazardous snow melts should be removed for consideration as a site for a transmission "facility". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Name: *Anne Collins* Anne Collins
Address: *806 Washington Ave*
La Grande OR 97850

References:

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; *Soil Protection* Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 10, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.

Re: **Geologic Hazard Protection - Drill site 96/4, 96/5 and 97/1 on unstable and steep slopes in an active seismic zone**

My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to the public, both local area residents and travelers on the nearby Interstate 84.

The relevant standard is 345-022-0020 Structural Standard:

“(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).”

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 96/4, 96/5, 97/1** is shown and described on the following tables

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5809AO; 5836AO; erosion hazard; rock outcrop, percent of slope Low; 2: High; 15. (sheet 3 and 4 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

96/4 – General

96/5 – Angle change along alignment

97/1 – Angle change along alignment

E.2 Landslide Descriptions

E.2.4 SLIDO 10; Sheet 6

“SLIDO 10 is referenced at a scale of 1:100,000 (Buss, 2006), and it’s located over 2,000 feet southwest of the IPC Proposed Route, near tower 96/3. It is mapped as talus/colluvium and will not likely impact the proposed alignment or any associated work areas or multi-use areas. A field reconnaissance of this area should be performed as part of the geotechnical exploration program.”

The applicant has not fully described the risks of heavy construction in this area. What mitigation methods would be required to place earthquake resistant towers on unstable slopes, in an active seismic zone, if the area suffered an earthquake of the intensity that formed these slopes.

Special Paper 6, included on the DOGAMI website, describes an extensive study done in 1979 by the Geoscience Research Consultants in Moscow, Idaho and State of Oregon Department of Geology and Mineral Industries on the seismic history of the Blue Mountains and the La Grande area. The introduction of this paper is closes as follows: “In summary, consistencies of structural trends, compatibility of the Blue Mountain folding to backslope faulting in the La Grande area and systematic distribution in the orientation of linear trends favor northwesterly compression as the tectonic control in the study area. Furthermore, the general lack of interference, or lateral offset of linears or of any of the intersecting faults, as is discussed in the next sections, **suggest that all of the post-Columbia River Basalt Group structures in the area near La Grande have been created in response to only one major tectonic episode.**”

Further in the same paper “The Graves Creek-Rock Creek-Coyote Creek area has the greatest density of faults within the study area. At least six major and several minor northwest-trending faults of the Rock Creek fault system occur in the area (Plate 1). The Graves creek fault can be traced from the eastern edge of Sec. 7, T35S, R37E to the southern boundary of the Hilgard 7 ½ - minute quadrangle, a distance of about 6 mi (10 km). The Graves Creek fault probably extends farther southeastward beyond the map area. Offset across this fault is 265 ft (80 km) in Sec. 34, T 35S, R37E.”

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 28) includes the following brief description of the area: The Mt. Emily Section (802) is described as “an 18 mile fault, forming a steep range front from Thimbleberry Mountain to the mouth of the Grande Ronde River Canyon, by Personius, compiled by the U.S. Geological Survey website and assessed in 11/16/2016.”

"The West Grande Ronde Valley fault zone may be active. Subtle topographic features indicate that there may have been earthquakes that broke through the ground surface as recently as the last 10,000 years. Previous studies indicate that the West Grande Ronde Valley fault is capable of generating a magnitude 7 earthquake." From Summary of the La Grande Quadrangle Geology" also on DOGAMI website.

345-022-000 (2)(D) states the the IPC's ASC must describe " The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...**" Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes." ASC, page H-12.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to the heavily traveled I84 transportation/utility corridor, the Hilgard Junction State Recreation Area and the Grande Ronde river. Further study and subsequent intrusive construction will not reduce the risks to the safety of the travelers through this canyon or the residents of the valley nearby. **The application does not comply with the relevant standard.**

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. "The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule seismic hazard includes ground shaking, ground failure, landslide, liquefaction, triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction."

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to Hilgard State Recreational Area, and the I84 transportation/utility corridor.

Commenter signature:

Anne Collins

Address:

Anne Collins
806 Washington Ave
La Grande OR 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.

Re: **Geologic Hazard Protection - Drill site 94/4 on unstable and steep slopes in an active seismic zone**

My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to the public, both local area residents and travelers on the nearby Interstate 84.

The relevant standard is 345-022-0020 Structural Standard:

“(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).”

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 94/4** is shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

Drill sites 94/4 is shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5830 BO; erosion hazard; severe, rock outcrop; percent of slope Low; 15; High; 30. (sheet 4 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 35

94/4 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5,6

"PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program."

The applicant has not fully described the risks of heavy construction in this area. What mitigation methods would be required to place earthquake resistant towers on unstable slopes, in an active seismic zone, if the area suffered an earthquake of the intensity that formed these slopes.

Special Paper 6, included on the DOGAMI website, describes an extensive study done in 1979 by the Geoscience Research Consultants in Moscow, Idaho and State of Oregon Department of Geology and Mineral Industries on the seismic history of the Blue Mountains and the La Grande area. The introduction of this paper is closes as follows: "In summary, consistencies of structural trends, compatibility of the Blue Mountain folding to backslope faulting in the La Grande area and systematic distribution in the orientation of linear trends favor northwesterly compression as the tectonic control in the study area. Furthermore, the general lack of interference, or lateral offset of linears or of any of the intersecting faults, as is discussed in the next sections, **suggest that all of the post-Columbia River Basalt Group structures in the area near La Grande have been created in response to only one major tectonic episode.**"

Further in the same paper "The Graves Creek-Rock Creek-Coyote Creek area has the greatest density of faults within the study area. At least six major and several minor northwest-trending faults of the Rock Creek fault system occur in the area (Plate 1). The Graves creek fault can be traced from the eastern edge of Sec. 7, T35S, R37E to the southern boundary of the Hilgard 7 ½ - minute quadrangle, a distance of about 6 mi (10 km). The Graves Creek fault probably extends farther southeastward beyond the map area. Offset across this fault is 265 ft (80 km) in Sec. 34, T 35S, R37E."

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 28) includes the following brief description of the area: The Mt. Emily Section (802) is described as "an 18 mile fault, forming a steep range front from

Thimbleberry Mountain to the mouth of the Grande Ronde River Canyon, by Personius, compiled by the U.S. Geological Survey website and assessed in 11/16/2016."

"The West Grande Ronde Valley fault zone may be active. Subtle topographic features indicate that there may have been earthquakes that broke through the ground surface as recently as the last 10,000 years. Previous studies indicate that the West Grande Ronde Valley fault is capable of generating a magnitude 7 earthquake." From Summary of the La Grande Quadrangle Geology" also on DOGAMI website.

345-022-000 (2)(D) states the IPC's ASC must describe " The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...**" Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes." ASC, page H-12.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to the heavily traveled I84 transportation/utility corridor, the Hilgard Junction State Recreation Area and the Grande Ronde river. Further study and subsequent intrusive construction will not reduce the risks to the safety of the travelers through this canyon or the residents of the valley nearby. **The application does not comply with the relevant standard.**

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. "The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule seismic hazard includes ground shaking, ground failure, landslide, liquefaction, triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction."

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to Hilgard State Recreational Area, and the I84 transportation/utility corridor.

Commenter signature:

Address:

Anne Collins

References:

*806 Washington Ave
La Grande OR 97850*

August 10, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.

Re: **Geologic Hazard Protection - Drill site 103/3 and 103/4 on unstable and steep slopes in an active seismic zone**

My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to the public, both local area residents and travelers on the nearby Interstate 84.

The relevant standard is **345-022-0020 Structural Standard:**

“(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).”

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 103/3 and 103/4** is shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

Soils; Map page 20 of 44:

Table B3: Soil Descriptions, described as:

18E, erosion hazard; severe; 61E; erosion hazard; severe, percent of slope Low; 5: High; 40.
(sheet 1 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 39

103/3 – Slope Stability/ Geo-Seismic Hazard

E.2 Landslide Descriptions

SLIDO-3.4 FernML2010_129

Northing: 5019127 Easting: 407892 Sheet 9

“SLIDO 129 is referenced at a scale of 1:100,000 (Ferns et al., 2010) and its mapped extents intersect the IPC Proposed Route, between 103/3 and 103/4. This slide appears to be contained within a drainage spanned by the two towers and it therefore unlikely to affect the proposed work areas. A field reconnaissance of this area should be performed as part of the geotechnical exploration program.”

The applicant has not fully described the risks of heavy construction in this area. What mitigation methods would be required to place earthquake resistant towers on unstable slopes, in an active seismic zone, if the area suffered an earthquake of the intensity that formed these slopes.

Special Paper 6, included on the DOGAMI website, describes an extensive study done in 1979 by the Geoscience Research Consultants in Moscow, Idaho and State of Oregon Department of Geology and Mineral Industries on the seismic history of the Blue Mountains and the La Grande area. The introduction of this paper is closes as follows: “In summary, consistencies of structural trends, compatibility of the Blue Mountain folding to backslope faulting in the La Grande area and systematic distribution in the orientation of linear trends favor northwesterly compression as the tectonic control in the study area. Furthermore, the general lack of interference, or lateral offset of linears or of any of the intersecting faults, as is discussed in the next sections, **suggest that all of the post-Columbia River Basalt Group structures in the area near La Grande have been created in response to only one major tectonic episode.**”

Further in the same paper “The Graves Creek-Rock Creek-Coyote Creek area has the greatest density of faults within the study area. At least six major and several minor northwest-trending faults of the Rock Creek fault system occur in the area (Plate 1). The Graves creek fault can be traced from the eastern edge of Sec. 7, T35S, R37E to the southern boundary of the Hilgard 7 ½ - minute quadrangle, a distance of about 6 mi (10 km). The Graves Creek fault probably extends farther southeastward beyond the map area. Offset across this fault is 265 ft (80 km) in Sec. 34, T 35S, R37E.”

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 28) includes the following brief description of the area: The Mt. Emily Section (802) is described as “an 18 mile fault, forming a steep range front from

Thimbleberry Mountain to the mouth of the Grande Ronde River Canyon, by Personius, compiled by the U.S. Geological Survey website and assessed in 11/16/2016.”

“The West Grande Ronde Valley fault zone may be active. Subtle topographic features indicate that there may have been earthquakes that broke through the ground surface as recently as the last 10,000 years. Previous studies indicate that the West Grande Ronde Valley fault is capable of generating a magnitude 7 earthquake.” From Summary of the La Grande Quadrangle Geology” also on DOGAMI website.

345-022-000 (2)(D) states the IPC’s ASC must describe “ The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation.” IPC characterizes the likelihood or strength of an earthquake in this area based on recent occurrences. **3.7.4 Recorded Earthquakes; ...**” Earthquake data for Idaho and Oregon were obtained from the applicable state geologic survey departments. None of the recorded earthquakes within the site boundary exceeded Richter magnitude 6.0. The recommended design earthquake magnitudes of 6.0 to 6.2 appear realistic, given the maximum magnitude of historic earthquakes.” ASC, page H-12.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area. Further study and subsequent intrusive construction will not reduce the risks to the residents of the valley nearby. **The application does not comply with the relevant standard.**

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. “The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule seismic hazard includes ground shaking, ground failure, landslide, liquefaction, triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction.”

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to a populated area.

Commenter signature:

Ann Collins

Address:

*806 Washington Ave
La Grande OR*

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

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: Anne Collins

Mailing Address: 806 Washington Ave
La Grande OR 97850

ESTERSON Sarah * ODOE

From: Anne Collins <annecollins47@yahoo.com>
Sent: Thursday, August 22, 2019 3:15 PM
To: B2H DPOComments * ODOE
Cc: Fuji Kreider
Subject: Comment letter Re: unsafe spacing of towers
Attachments: commentltrseismicgeneral.docx

Thank you for you careful attention to this matter. Anne Collins

Sent from [Mail](#) for Windows 10



Virus-free. www.avg.com

August 10, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.: **Unsafe siting of drill sites adjacent to the City of La Grande in an active seismic zone.**

My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to local area residents.

The relevant standard is 345-022-0020 Structural Standard:

“(a) The applicant through appropriate site-specific study, has adequately characterized the seismic hazard of the site; and

(b) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site. As identified in subsection (1)(a);

(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).”

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. IPC relies on DOGAMI's assurance that “4) You (DOGAMI) were aware that in transmission line construction, **design for wind and ice forces is more than sufficient to account for typical seismic forces**”, (IPC letter to DOGAMI dated 17 December 2012 and included in the ASC, summarizing a meeting in 2011). This refers to the American Society of Civil Engineers (ASCE) Guidelines for Electrical Transmission Line Structural Loading (Wong and Miller 2010), which further states, **“This may not be the case if the transmission structure is partially erected or if the foundations fail due to earth fracture or liquefaction.”**, Page H-10, ASC.

345-022-000 (2)(D) states the IPC's ASC must describe..."The magnitude of any anticipated adverse effects on a resource or interest, taking into account any proposed mitigation." IPC has presented a letter to DOGAMI summarizing a meeting in 2011. IPC's "desktop geology report presents... the seismic hazards that could affect the project". What follows in Exhibit H-I follows is already established data: "The conclusions and recommendations contained in this report are based primarily on available published information, with very limited field reconnaissance."

Table B-8. Proposed Route Structure, page B-50 proposes that the Distance Between Structures (ft) of the 500-kV Single-Circuit lattice Steel Structure would be 1,200-1,800 feet. Here is how the data in Exhibit H presented for one of the routes that traverses the entire south side of the city including the hill the Grande Ronde Regional Hospital, a critical access hospital, rests upon.

Tower 101/1 to 103/3: More than two miles between towers.

101/1 Soil is 40C – Moderate erosion, 7.3 ph Construction requires truck or track; straddles SLIDO 134

103/3 Soil is 18E – Severe erosion, 7.8 ph 5-40% slope; on the edge of SLIDO 129. Requires track construction.

Tower 106/3 to 110/2: approximately four miles straddling an earthquake fault.

106/3 Soil is 56F – Severe erosion, 7.3 ph 35-700% slope, crossing SLIDO 380 and directly above another landslide documented by Schlicher & Dean, 1971. Table C-1 Proposed Borings cites Angle change, slope and geologic hazard. Requires track or platform construction.

110/2 Soil is 56E – Severe erosion. 7.3 ph 35-70% slope, Table C-1 cites angle, slope, geo-hazard and fault crossing. Requires track construction.

Tower 110/3 to 112/4: approximately two miles.

110/3 Soil is 56F – Severe erosion. 7.3 ph 35-70% slope, Table C-1: slope and geo-hazard. Requires track construction.

112/4 Soil is 56E – Severe erosion. 7.3 ph, 7-35% slope, Requires track construction.

Tower 117/2 to 120/3: approximately three miles.

117/2 Soil is 18E – Severe erosion. 7.8 ph, 5-40 % slope, requires track

120/3 Soil is 17E – Severe erosion. 7.8 ph, 20-40% slope, requires track construction, cites angle change, highway crossing and utility crossing.

Are towers missing from Table C1: Summary of Proposed Borings? Is IPC having problems locating towers at many points on this route due to the delicate crust of the earth in the foothills above the City of La Grande? Because the IPC failed to include all the towers on this route meeting their estimate of spacing between towers, the application does not comply with the relevant standard.

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. This is not a route that provide corridor stability as a backup to the Western Oregon energy corridors. Approving this corridor just puts another utility infrastructure asset at risk of seismic hazard.

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to a populated area on unstable slopes and over earthquake faults.

Anne Collins, M.A., M.L.I.S., retired librarian

806 Washington Ave, La Grande, OR 97850

References:

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 *SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2*; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 *Geology of the Upper Grande Ronde Basin, Union County, Oregon*: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy, Energy Facility Siting Council, OAR Amend: 345-022-0020; *Structural Standard* EFSC 2-2017 Chap. 345, Division 22; General Standards for Siting Facilities. Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018, Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035, page 28 and elsewhere.

Schlicker, H. G. and Deacon R. J. 1971 *Engineering Geology of the La Grande Area, Union County, Oregon*: Oregon Department of Geology and Mineral Industries Open File Report O-1971-03, 16 p., 1 plate, scale 1:24,000.

State of Oregon Department of Geology and Mineral Industries; Publications Center;
<http://www.oregongeology.org/pubs>.

References:

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; *Soil Protection* Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 10, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Soil Protection - **Drill site 108/3; 109/2 and its vicinity on unstable and steep slopes**

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground.

The applicable standard is: OAR 345-022-0022. (c) *...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near **Drill site 108/3 and 109/2 and vicinity** is shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

E.2.9 SLIDO 380,33

SLIDO-3.4 FernML2010_380 Northing 5016237 Easting 414116 Sheets 11,12

SLIDO-3.4-WalkGW2002_33 Northing 5016237 Easting 414116 Sheets 11,12

"SLIDO 380 and 33 appear to refer to the same landslide feature and are referenced at scales of 1:100,000 and 1:500,000, respectively (Ferns et al., 2010; Walker, 2002). The IPC Proposed Route crosses the mapped limits of the slide between towers 108/2 and 109/2, and may affect stability at towers 108/3 through 109/2, along with the associated work areas. Schlicker and Deacon (1971) mapped slightly different extents of the same features at a scale of 1:24,000. In the Schlicker and Deacon (1971) map, the extents of one slide area are about 650 feet southeast of tower 107/4 and 465

feet northeast of tower 107/5. A field reconnaissance of these areas should be performed as part of the geotechnical exploration program."

Idaho Power Corporation, in Exhibit H 2.2.4 states *"The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard."*

Idaho Power Corporation admits in ASC page B-12 that *"The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes presenting design and construction challenges."*

IPCs stated original intention to the EFSC was the following: *"Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line."*

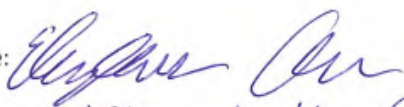
Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the Winter storms and the Spring melt can be precipitous and unpredictable.

The area surrounding **Drill sites 108/3; 109/2** and the vicinity adds a hazard of unknown proportions to a populated area with a delicate earth crust. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site Drill sites 108/3; 109/2, and its vicinity, represent a significant risk of several possible adverse effects. This area characterized by steep slopes and hazardous snow melts should be removed for consideration as a site for a transmission "facility". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Name: 
Elizabeth Collins
Address: 2109 Third St Apt G
La Grande, OR 97850

August 10, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Siting Senior Analyst

Oregon Department of Energy

550 Capitol St. N.E.

Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Soil Protection - **Drill site 89/3, 90/1 and 90/2 on unstable and steep slopes**

My comment addresses the known hazards and adverse effects of construction of the B2H transmission line on unstable ground. My name is Marcia Collins and I have lived in La Grande for thirty years. I love this valley and the Blue Mountains area.

(c) ...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 89/3, 90/1 and 90/2 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 17 of 44:

Table B3: Soil Descriptions, described as:

5856 BO; Erosion hazard – severe; 5856 CO – Erosion hazard - severe

Table C1: Summary of Proposed Borings; Map Sheet 34

89/3 – Angle change along alignment

90/1 – Slope Stability/Landslide; Geo-Seismic Hazard

90/2 – Slope Stability/Landslide; Geo-Seismic Hazard

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5,6

"PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program."

Idaho Power Corporation, in Exhibit H 2.2.4 states *"The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard."*

Idaho Power Corporation admits in ASC page B-12 that *"The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes presenting design and construction challenges."*

IPCs stated original intention to the EFSC was the following: *"Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line."*

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the Winter storms and the Spring melt can be precipitous and unpredictable.

The area surrounding the drill site **95/3 and 95/4** is within a mile of a the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor. **The steep and unstable slopes will require many intrusive modifications to meet the standard of safety and could very easily "aggravate" the stability of the slopes. The application does not comply with the relevant standard.**

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002, should be removed for consideration as a site for a transmission "facility". Idaho Power Corporation in *Exhibit H 3.9 Mitigation* describes methods, trucks, and towers designed to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Name:

Marcia Collins

Address:

*1802 3rd St
La Grande OR
97850*

References:

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

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Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; *Soil Protection* Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

TARDAEWETHER Kellen * ODOE

From: Rebecca Collman <rcollman@icloud.com>
Sent: Saturday, August 17, 2019 8:15 AM
To: B2H DPOComments * ODOE
Subject: B2H

August 17, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.

Dear Chair Beyeler and Members of the Council:

Yet ANOTHER reason to reject the B2H! PLEASE USE AN ALTERNATE ROUTE.

COMMENT REGARDING THE NOISE DECISION REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE

Idaho Power did not complete noise monitoring and noise modeling for all 'Noise Sensitive Properties,' including my own, in compliance with the Oregon Department of Environmental Quality (ODEQ) regulations, Chapter 340, Division 35 and the ODEQ Sound Measurement Procedures Manual (NPCS 1.)

Idaho Power had a choice for determining the baseline ambient noise measurement: a) use the standard baseline measurement of the ODEQ at 26 dBA; or, b) conduct actual monitoring at the noise sensitive property. Idaho Power stated that due to the large number of NSR's, identified within the analysis area, it was not feasible to conduct baseline monitoring at every individual noise sensitive property. (Page 5, Line 36 of the Baseline Sound Survey.) (Noise Sensitive Receptor or NSR is also used to refer to noise sensitive property, NSP.)

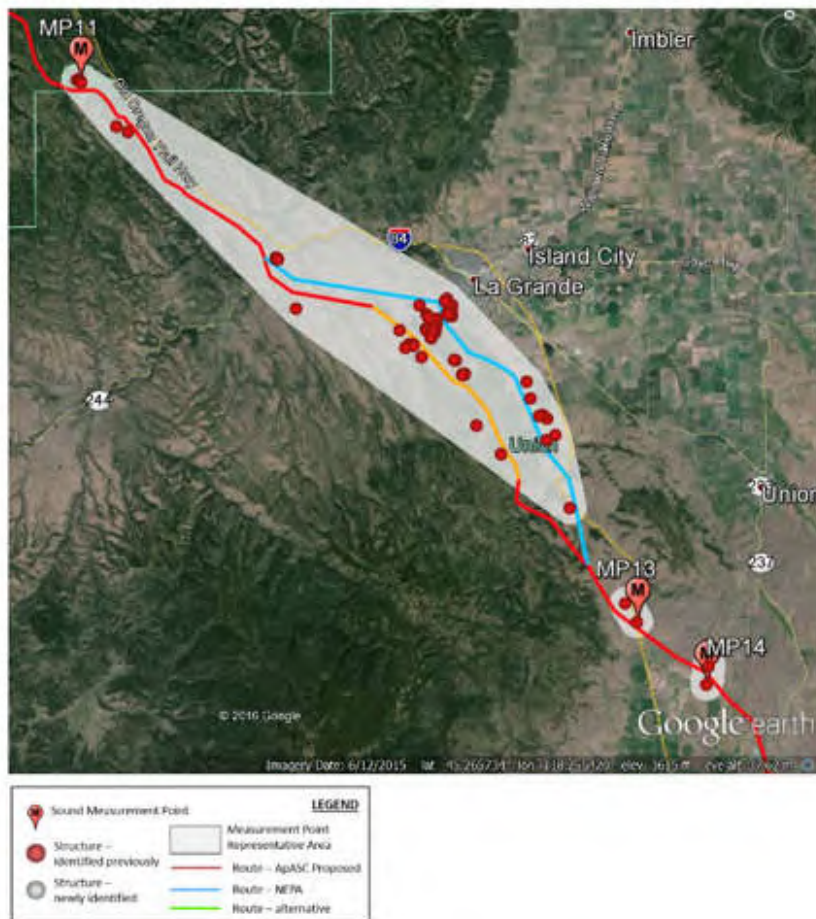
Instead, they placed measuring points "representative of the house and yard accommodations." Measuring points were placed "in similar surroundings experiencing the same weather and acoustic conditions of where a resident was expected to spend the majority of time when outdoors" or they were placed to accommodate the homeowner's request. See 3.2, Page 7 of Baseline Sound Survey.

The practice of using a baseline sound measurement at a single monitoring point to represent a group of nearby noise sensitive properties is unacceptable and does not comply with the ODEQ rules and standards. This is why a standard baseline exists. They could have simply followed the ODEQ standard and used 26dBA as a baseline.

Idaho Power attributed noise measurements at a single noise sensitive location to multiple other noise sensitive properties where measurement did not occur based upon a subjective evaluation that the terrain was similar or they were in the reviewer's estimation close to the property that was actually measured. For example, the measurement for MP 11 was used to establish baseline noise level for a total of 63 noise sensitive properties according to Table 1 listing, in Attachment X-6, "Monitoring Points representing Noise Sensitive Receptors," page 2 of the "Technical Memorandum, Ch2M dated April 29, 2016." Monitoring Position 11 is 207 feet from the Union Pacific Railroad. This alone should preclude any determination that it is consistent with the other locations which do not have a railroad track located this close to them. It thus invalidates all results from the Monitoring Position 11 being used as the baseline noise measurement applied to other noise sensitive receptors, like my home. Please do not contaminate my lovely home and our peaceful valley with the noise emitted from these lines.

Rebecca Collman
61695 Skyline Lane
La Grande, Oregon 97850
541-975-3131

B2H Preliminary: Morgan Lake and Mill Creek Alternatives
Overall view of MP11, MP13, and MP14



TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" ¹ specifically the Modelaire-Hawthorne Loop) ², hereafter referred to as the "loop", of La Grande to access the site entrance. This residential "loop" was constructed without sidewalks for a new development around the early 1960s.

According to OAR 345-022-0110, Public Services (pg. 5. April 2017) "The applicant...must address all permanent and temporary impacts of the facility on housing, traffic, safety, police and fire protection, health care and schools." ³

My impression from reviewing the application Page 17 ⁴ is that the applicant has not fully examined the final portion of the intended route nor does it fully recognize or address the need for traffic mitigation. This "loop" is the only access to/from thirty-six houses to the rest of the city. The area to the north of the "loop" is occupied by the Grande Ronde Hospital and Medical Clinic. Two blocks to the east is located the local high school and a grade school. ²

In June of 2016, the Grande Ronde Hospital petitioned the City to have a conditional use for a parking lot expansion project next to Hawthorne. The Conditional Use Permit was approved subject to the Condition of Approval that "No driveway access to GRH parking lot areas shall be permitted onto Hawthorn Drive as such street is developed to residential standards and is not designed to support commercial traffic." ⁵

The La Grande Director of Public Works, Kyle Carpenter, provided information regarding the widths for the streets in question. The two streets range from 33 feet to 37 feet in width with no sidewalks. I personally measured the area where the unpaved stem of Hawthorne leaves the "loop" to go up the hill. At the junction it measures 32 feet curb cut to curb cut and narrows to 18-21 feet in width as it goes around the corner up the hill. 6 The Public Works Director also provided pictures of the mapping system showing the existing utilities located in the "loop". 7-8. It should also be noted that from the entrance to the "loop" at Sunset Drive to the entrance of the site the road has a 16% grade.

Attachment 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

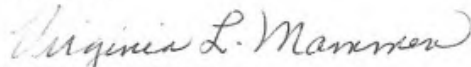
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

Exhibit 1

City of La Grande Ordinance Number 3242,
 Series 2018
 Page 236 of 312

**TABLE 1
 STREET STANDARDS**

Functional Classification	ADT Volume	Speed (mph)	# of Travel Lanes	Travel Lane Width	Turn Lane or Median Width	Bike Lanes	Min. Bike Lane Width	On-Street parking
Downtown Arterial	10,000	20	2-3	11'	11'			both sides
Arterial	10,000	40-55	2-5	12'	4-14'	optional ⁴	5'	none
Major Collector	2,000 - 10,000	25-45	2-3	11'	12'	required	5'	one or both sides
Minor Collector	1,000 - 2,000	25-35	2	11'	none	Optional ⁵	5'	one or both sides
Local Street	0 - 1,000	15-25	2	10'	none	none	none	one or both sides

Functional Classification	Sidewalks	Min. Sidewalk Width	Planting Strip Width ¹	Total Paved Width ²	Total ROW Width ³	Private Access Spacing
Downtown Arterial	required	12'	3'6" ⁶	49'	80'	200'
Arterial	required	5'	8'	36'-72'	80'-102'	200' - 400'
Major Collector	required	5'	8'	52'-60'	62'-90'	150' - 300'
Minor Collector	required	5'	8'	30'-48'	60'-78'	75' - 150'
Local Street	required	5'	8'	28'-36'	40'-66'	Each Lot

¹A portion of the required planting strip width may be used instead as additional sidewalk width or reduced right of way, as appropriate.

²The minimum of the paved width was calculated with the following assumptions:

Arterials: Two (2) travel lanes, four foot (4') median divider, no center turn lane, no bike lanes.

Major Collectors: Two (2) travel lanes, two (2) bike lanes, no center turn lane, parking on one (1) side.

Minor Collectors: Two (2) travel lanes, parking on one (1) side of street, no bike lanes.

Local Streets: Two (2) travel lanes, parking on one (1) side of street.

The maximum paved width for each street was calculated assuming the inclusion of all required and optional facilities. Minimum paved widths for each street are as required in Section 6.2.005 of this Code.

³These right-of-way width ranges are for new streets.

⁴Bike lanes should be provided on Arterials unless more desirable parallel facilities are designated and designed to accommodate bicycles.

⁵ Bike lanes should be provided on Minor Collectors where traffic volumes or other factors warrant. Otherwise, Minor Collectors should be designed and designated as shared roadway facilities with wide outside travel lanes of 14' on important bike routes.

Exhibit 2

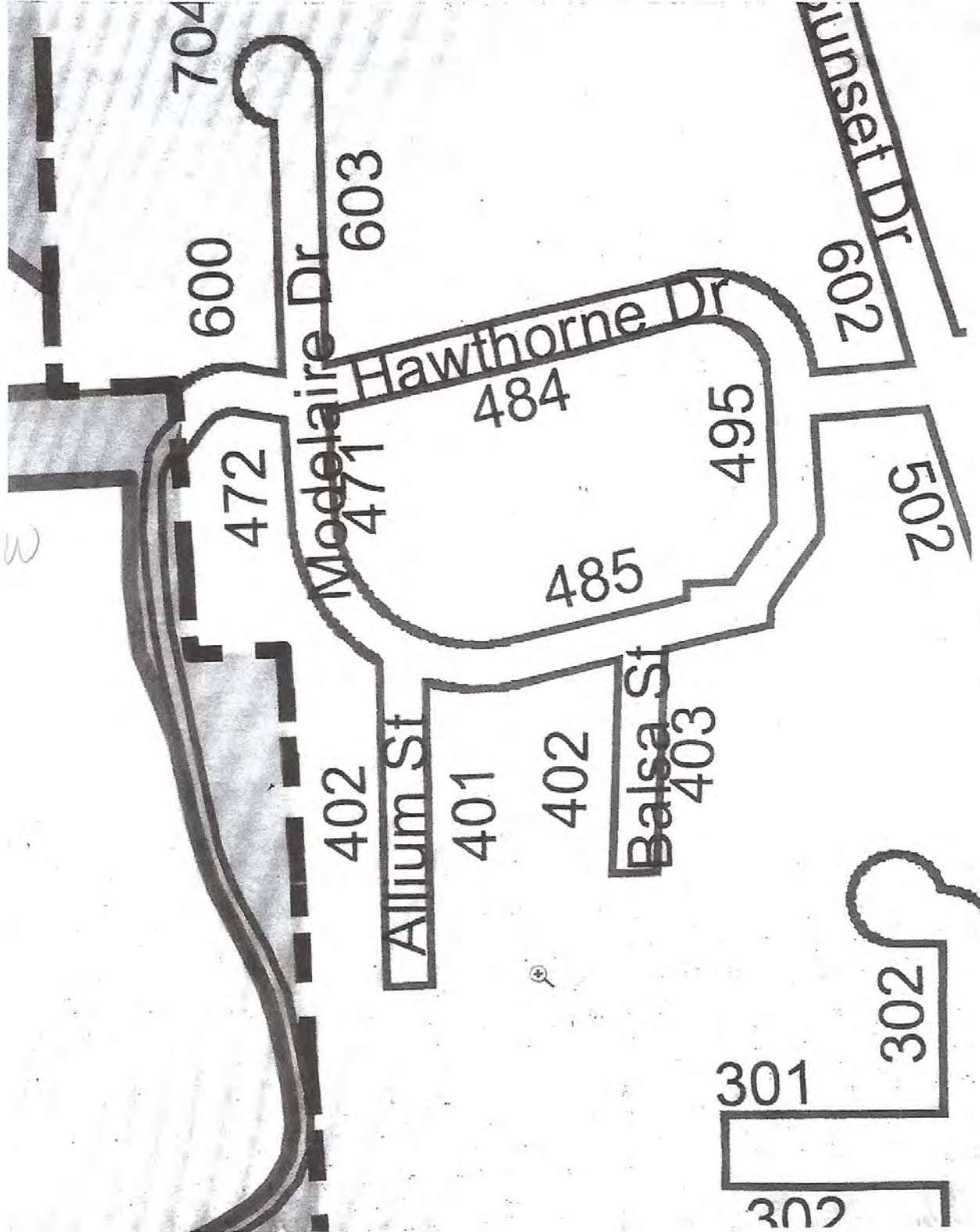


Exhibit 3

Public Services

ORAR 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

ORAR 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

ORAR 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" (ORAR 345-023-0020) or the "System Reliability Rule for Electric Transmission Lines" (ORAR 345-023-0030). Under the Least-Cost Plan Rule, the applicant meets this standard if the proposed transmission line was included in an Integrated Resource Plan that has been acknowledged by the Oregon Public Utilities Commission (OPUC). More information about the OPUC and the Integrated Resource Plan acknowledgement process can be found at www.puc.state.or.us.

Specific Standards for Wind Facilities

ORAR 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

ORAR 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.



Exhibit 4

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.	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	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: <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> <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 ASC Exhibit U, Attachment U-2, shall be included and implemented as part of the final county-specific plan, unless otherwise approved by the department;</i> <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> <i>c. The site certificate holder shall develop traffic control measures to mitigate the effects of Project construction traffic.</i> <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>
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Exhibit 5

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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.

Exhibit 6

7/25/2019

Gmail - Modelaire Roadway Specifications



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



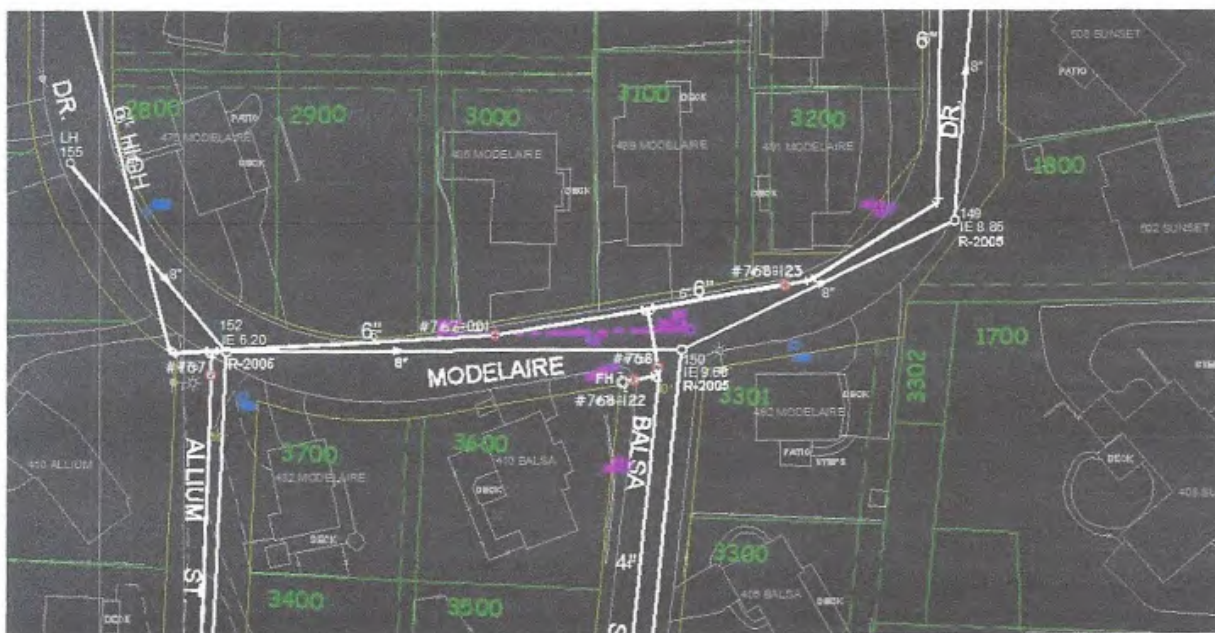
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

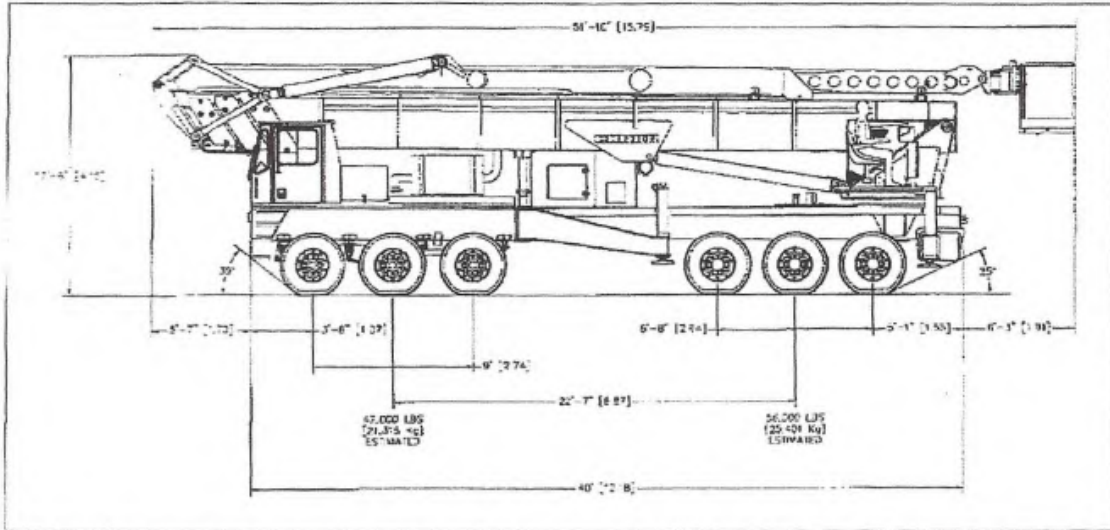


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

Exhibit 10

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-all, 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-

Exhibit 11

City of La Grande Ordinance Number 3242,
Series 2018
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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.

Exhibit 12

Transportation and Traffic Plan

Boardman to Hemingway Transmission Line Project

Table 6. Construction Vehicle Trips per Day per Construction Spread

Construction Crew Type	Construction Vehicles					
	Light Construction Vehicles			Heavy Construction Vehicles		
	Number of Pickups/ Mechanic Trucks (per day)	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)	Number of Other Vehicles	Number of One-way Trips on Public Roads (per day)	Total One-way Trips (per day)
Substation Construction	20	2	40	5	2	10
ROW Clearing	9	4	36	5	4	20
Roads/ Pad Grading	9	4	36	9	2	18
Foundations	9	2	18	5	8	40
Tower Lacing (assembly)	27	2	54	0	0	0
Tower Setting (erection)	20	2	40	0	0	0
Wire Stringing	9	4	36	9	4	36
Restoration	3	2	6	0	0	0
Blasting	5	4	20	0	0	0
Material Delivery	20	8	160	12	2	24
Mechanic and Equipment Mgmt.	5	6	30	0	0	0
Refueling	0	0	0	5	4	20
Dust Control	0	0	0	5	4	20
Construction Inspection	5	8	40	0	0	0
Concrete Testing	5	4	20	0	0	0
Environmental Compliance	9	6	54	0	0	0
Surveyors	5	3	30	0	0	0
Totals	—	—	620	—	—	188

Exhibit 13

7/24/2019

Roadway Design Manual: Minimum Designs for Truck and Bus Turns

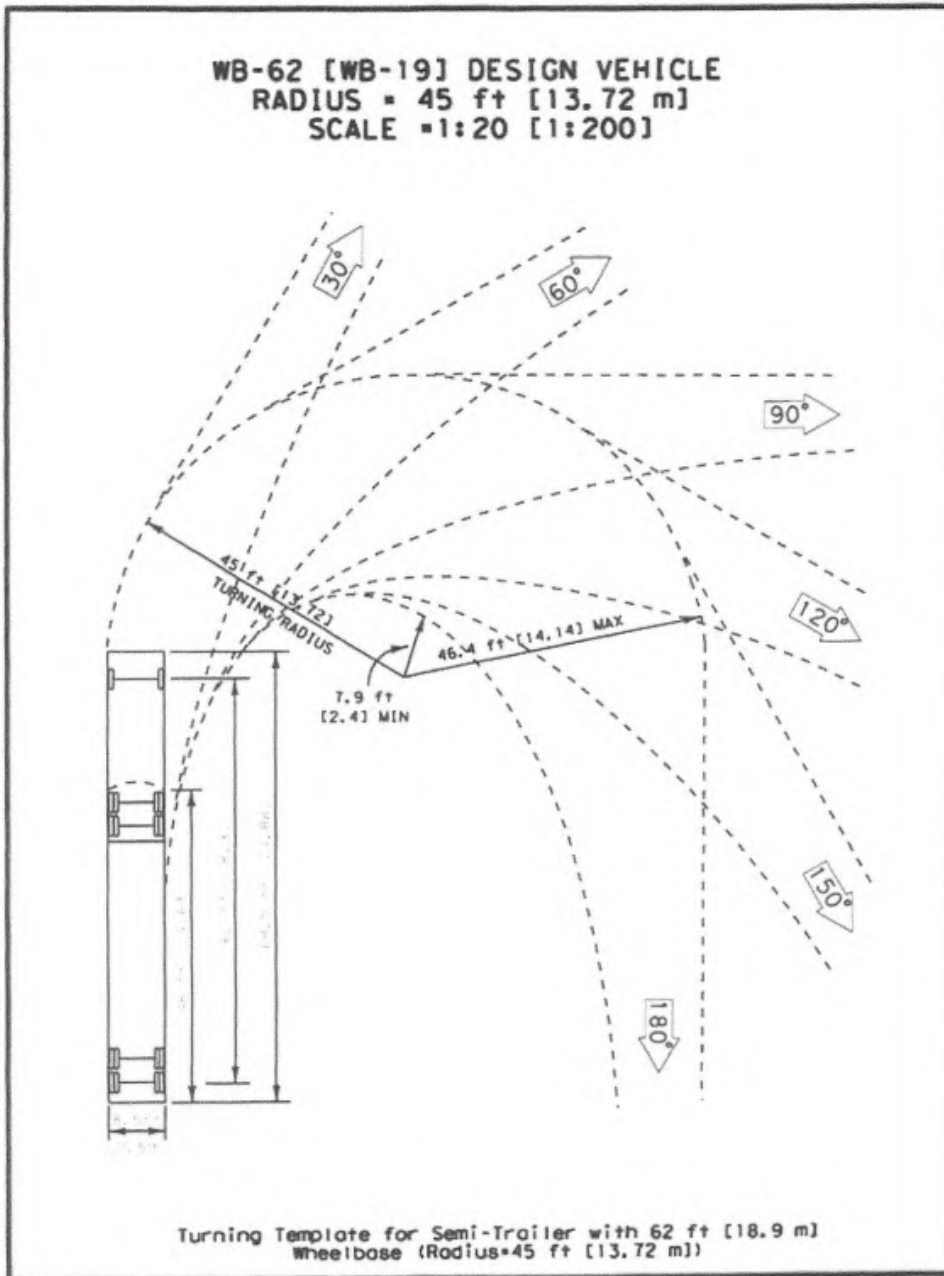


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

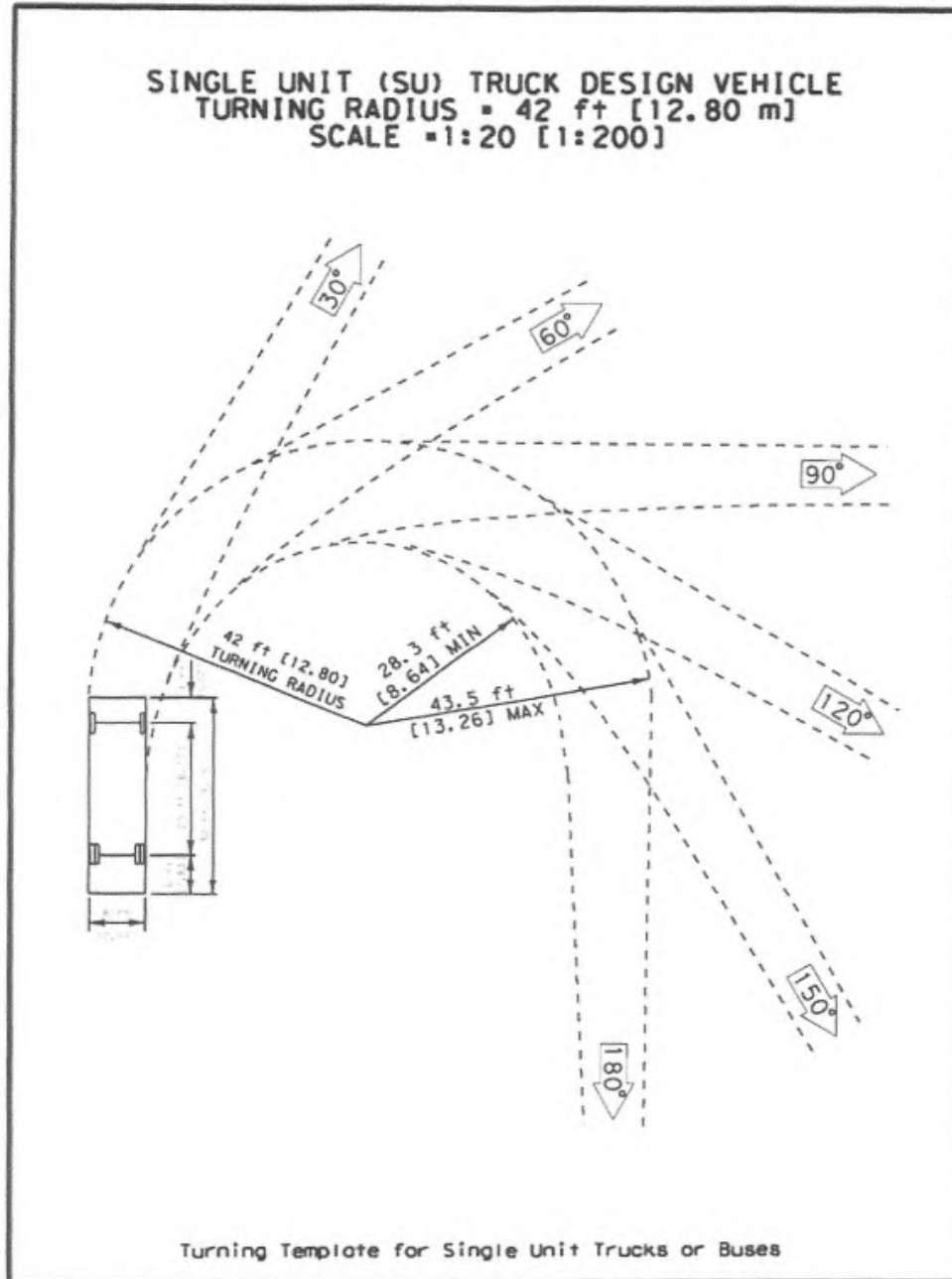


Exhibit 15

**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

Exhibit 16

ORDINANCE NUMBER 3077
SERIES 2009
Page (8)

a. City Regulation of Special Movement of Oversized Load

The applicant shall submit an application to the City Manager or designee, showing the terminal points of the purported movement; the proposed route; the nature of the movement requested, including the weight and dimensions of the vehicle, load, machine, building, or structure to be moved; the time, date and duration of the proposed movement.

b. Special Movement Permit

A permit shall be required to move any vehicle, structure, or load on, or to access a street when, after preparation for movement, the vehicle, structure or load exceeds fourteen feet (14') in height, requires the use of guy wires, or could result in the blockage of a street. An approved application may serve as a permit, and a copy of the approved application shall be provided to the applicant.

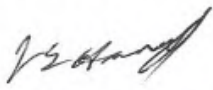
Section 17. TRUCK ROUTES

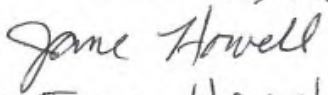
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, pounds specifically picking up deliveries or making deliveries to any business or residence located on a street that is not a truck route will be exempted if the vehicle is driven from the truck route to the destination in the shortest, most direct, and safest route.
- c. The use of Jacob brakes shall not be allowed within the city limits of La Grande, Oregon.
- d. Truck routes will be posted as follows:
 1. Walnut street north from the city limits to C Avenue;
 2. C Avenue east from Walnut Street to Gekeler Avenue;
 3. Gekeler Avenue east to the city limits;
 4. 12th street south from Gekeler Avenue to the city limits;
 5. 2nd Street south from the city limits to Adams Avenue;
 6. Monroe Avenue east from Spruce Street to Highway 82;
 7. Jackson Avenue east from Spruce Street, and
 8. Spruce Street south from the city limits to Monroe.

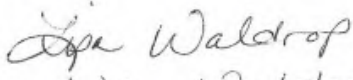
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

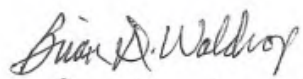
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement officer may cause the vehicle to be towed and stored at the owner's expense. The owner shall be liable for the costs of towing and storing, notwithstanding that the vehicle was parked by another or that the vehicle was initially parked in a safe manner but subsequently became an obstruction or hazard.

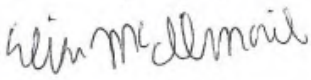
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
ADDRESS 482 Modelaire DR
EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
ADDRESS 475 Modelaire Dr.
EMAIL ldjw62@gmail.com

SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
ADDRESS 475 MODELAIRES DR.
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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
jessiehuxell@live.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

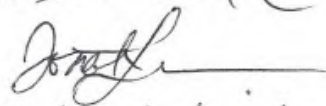

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell@EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

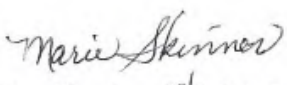

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

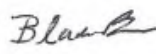

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

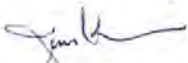
ADDRESS


EMAIL

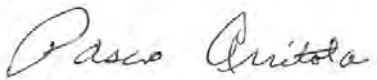

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

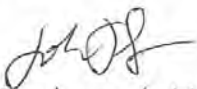
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@conr.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

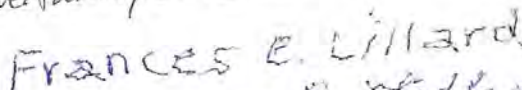
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL PSTOLA@CHARTER.NET


SIGNATURE 
PRINTED NAME John Bazuta
ADDRESS 414 Hawthorne LG, OR 97850
EMAIL

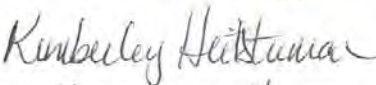
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

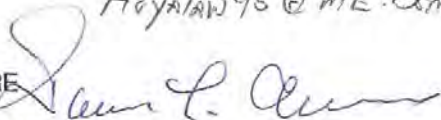
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

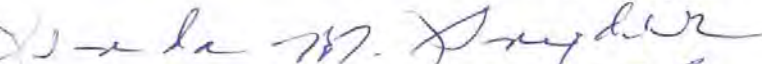
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

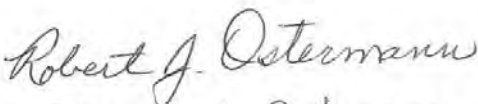
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL Kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2409 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

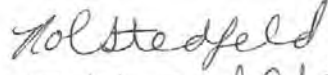
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

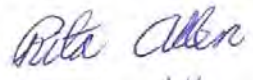
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

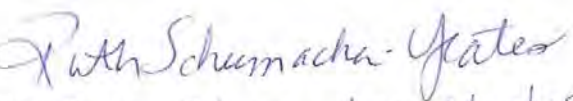
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

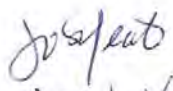
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com


SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

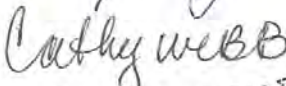
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

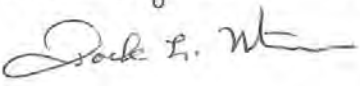
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

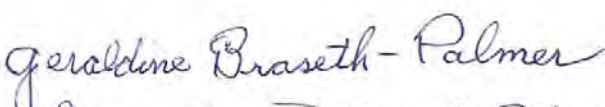

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

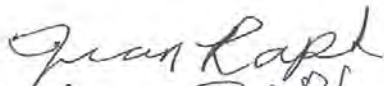
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com

SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 BILDENEST DRIVE LA GRANDE, Ore 97850
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SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jbaph19@gmail.com