

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

8/4/2019

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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



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

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Abstract

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

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

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

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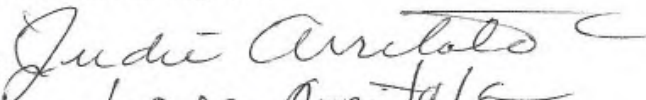


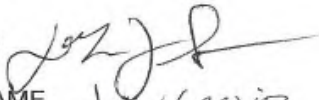
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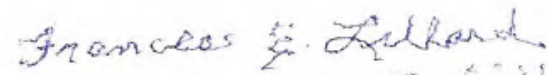
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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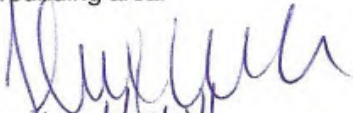
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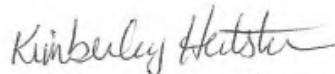
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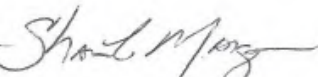
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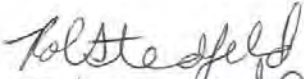
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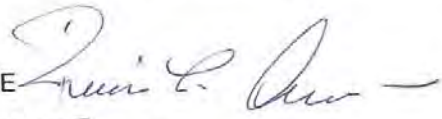
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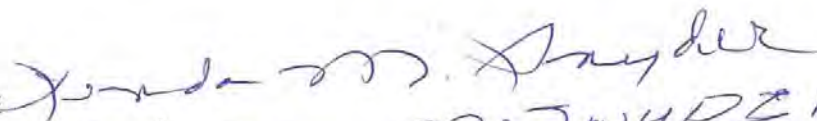
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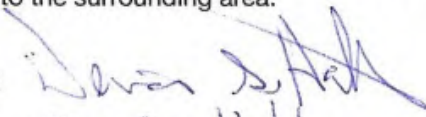
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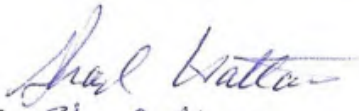
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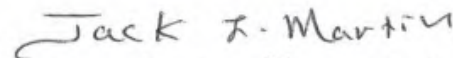
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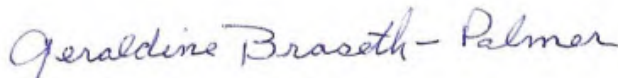
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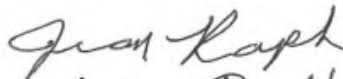
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SIGNATURE *Gary D. Pierson*
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SIGNATURE *Anne G. Cavinato*
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SIGNATURE *Angela Sherer*
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Merle E Comfort*
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SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 4th Street - LaGrande - OR 97850
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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*
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SIGNATURE *Heather M. Null*
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SIGNATURE *Bert R. Frewing*
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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: US POSTAL SERVICE

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!**

Respectfully Submitted,



JeAnn Marlette
2031 Court Street #8
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Email: garymarlette@yahoo.com

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: U.S. POSTAL SERVICE

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 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 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 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° 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.

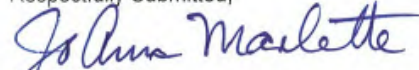
5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
 - a. It is a BLM ACEC area managed for public tourism
 - b. It is the single most visited tourist facility in Baker County
 - c. 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 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 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.

Respectfully Submitted,



JoAnn Marlette
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ESTERSON Sarah * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Tuesday, August 20, 2019 10:36 AM
To: B2H DPOComments * ODOE
Subject: b2h comment letter
Attachments: _EFSC letter fire.odt

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

August 20, 2019

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.

Respectfully submitted,

JoAnn Marlette
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ESTERSON Sarah * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Tuesday, August 20, 2019 10:40 AM
To: B2H DPOComments * ODOE
Subject: b2h comment letter
Attachments: FU B2H Fire hazards and response concerns opuc document.odt

August 20, 2019

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

EMAIL: B2H.DPOComments@Oregon.gov

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

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

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

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

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

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

Respectfully submitted,

JoAnn Marlette
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ESTERSON Sarah * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
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To: B2H DPOComments * ODOE
Subject: b2h comment letter
Attachments: FU FIRE HAZARDS INADEQUATE PEOPLE AND EQUIPMENT.odt

August 20, 2019

Kellen Tardaewether, Senior Siting Analyst
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REGARDING; CONCERNS DUE TO THE INCREASED RISK AND LACK OF RESPONSE CAPABILITIES IN THE EVENT OF A FIRE ALONG THE TRANSMISSION LINE

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

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

This development will have a significant impact on the local service providers to provide protection and respond to fires. There would be construction occurring during the hot, dry summer, that they will be establishing Right of Ways with abundant low lying, heavy brush and grass which burns fast and hot. There are long distances along the entire length of the transmission line with no designated fire response unit, the employees building and maintaining the transmission line are not going to be qualified to fight fires they create, there is a lack of specialized equipment needed to fight transmission line caused fires, response times will be excessive, there is a lack of paid personnel available to deal with these remote fires, some fire stations have old equipment, and they will be creating hundreds of miles of new and improved roads to allow and increase access for human caused fires.

According to the Forest Service, between 88% and 90% of wildfires are human caused. There will be a significant increase in access for both people and vehicles along the entire right of way

for the life of the transmission line. For example, Union County identified the following needs if the developer is going to rely upon local fire protection resources:

- Each volunteer firefighter needs to be provided with a phone and GPS system utilizing current technology able to provide service in remote areas along the transmission line
- There is a need for two heavy duty all terrain water trucks and any additional equipment needs identified by the Fire Chief.
- An additional full time position with the County fire department during any construction occurring in Union County.
- A permanent ½ time position to provide monitoring, training and firefighting during the life of the development.
- The county needs to participate in the development of a fire plan prior to it being accepted
- There is a need to provide resources to assure a response time of 14 minutes or less 90% of the time as required by NFPA.

A matter that adds significantly to the risk is the fact that the developer is stating they will rely upon Rural Fire Protection Services to respond and fight fires along the transmission line. These fire departments are only authorized to fight structural fires.

I hope you take these comments seriously, as the risk of catastrophic fires in the areas being impacted by the Boardman to Hemingway Transmission line are high. No acceptance of Condition Number 6 should be given until the developer has shown that they are dealing with the increased fire potential they are creating through this development.

Respectfully submitted,

JoAnn Marlette
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ESTERSON Sarah * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Tuesday, August 20, 2019 10:48 AM
To: B2H DPOComments * ODOE
Subject: b2h comment letter
Attachments: FU The developer must provide resources and equipment to fight fires.odt

August 20, 2019

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, Oregon 97301

email: B2H.DPOComments@Oregon.gov

The 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 wild-land fires.

Respectfully submitted,

JoAnn Marlette

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ESTERSON Sarah * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Tuesday, August 20, 2019 10:53 AM
To: B2H DPOComments * ODOE
Subject: b2h comment letter
Attachments: Timber Losses--Goal 4.odt

August 20, 2019

Kellen Tardaewether, Senior Siting Analyst
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THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

In summary:

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

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

Respectfully submitted,
JoAnn Marlette
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Phone: 541-523-5851

ESTERSON Sarah * ODOE

From: Gary Marlette <garymarlette@yahoo.com>
Sent: Tuesday, August 20, 2019 11:00 AM
To: B2H DPOComments * ODOE
Subject: b2h comment letter
Attachments: _1Weeds and Oregon Conservation Strategy.odt

August 20, 2019

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

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

Dear Chair Beyeler and Members of the Council;

The following comments concern Idaho Power's faulty and illegal "Noxious Weed Plan" (DPO Attachment P 1-5) as well as their failure to take into account in any way, the Oregon Conservation Strategy.

The Oregon Conservation Strategy <http://oregonconservationstrategy.org/overview/> "*represents Oregon's first overarching state strategy for conserving fish and wildlife. It uses the best available science to create a broad vision and conceptual framework for long-term conservation of Oregon's native fish and wildlife, as well as various invertebrates, plants, and algae. The Conservation Strategy emphasizes proactively conserving declining species and habitats to reduce the possibility of future federal or state listings. It is not a regulatory document but instead presents issues, opportunities, and recommended voluntary actions that will improve the efficiency and effectiveness of conservation in Oregon.*"

Under the Oregon Conservation Strategy, IPC's B2H project is a Key Conservation Issue: "*(KCI)s are large-scale conservation issues or threats that affect or potentially affect many species and habitats over large landscapes throughout the state.*"

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

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!

Respectfully submitted,

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August 20, 2019

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Via Email: B2H.DPOComments@Oregon.gov

SUBJECT: IDAHO POWER APPLICATION FOR A SITE CERTIFICATE FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION PROJECT 9/28/18; DRAFT PROPOSED ORDER 5/23/19

To: Chairmen Beyeler and Members of the Council

The Boardman to Hemingway transmission line should not be allowed to use the Bureau of Reclamation lands for access or construction. The Bureau of Reclamation is charged with development of water resources for agricultural use and for the public good using public financing. This transmission line will place water resources as well as agricultural lands of the state at risk. No surface-disturbing activities should occur within the Bureau of Reclamation's right of way, as doing so, will result in potential interruption of irrigation resources to farmlands, create a risk to maintenance personnel, increase the invasive weeds and potential for movement of seeds to farmlands receiving water from the canal, and result in wind and water erosion moving soil into the water creating the potential for damaging irrigation equipment and fish habitat.. The rules which apply to this inappropriate use of land include the land use rules, specifically, Goal 4 and Goal 5 which require the protection of farm and forest lands and must assure that the actions of the Department and Council do not significantly increase the costs of farm and forest operations. The potential for lack of water due to damage to pumps and equipment resulting from soil in the water and the likely instances of outbreaks of noxious weeds brought onto farmlands by the development being located in such a way as to cross and run parallel to this water source will result in unsustainable financial damages to farms in the area of the transmission line.

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APPLICANT FAILED TO INCLUDE A SERIOUS ANALYSIS OF NON EFU ROUTES REQUIRED BY ORS 215.

Exhibit K, 4.1.1.4 Non-EFU Alternatives.

The applicant states that “The proposed EFU avoidance route provides substantially the most direct route between the Project endpoints while avoiding EFU lands where possible. They also claim that the evaluation they did met the standard of being reasonable by virtue of being fair, proper, just, moderate and suitable under the circumstances. If their statements were actually accurate, the preferred route and alternate route proposed in the application for a site certificate would meet the requirements of ORS 215.275 AND OAR 345-022-0030.

Unfortunately, the application does not support Idaho Power's stated results for the following reasons:

- The applicant failed to do a robust evaluation of the alternative routes and provided practically no analysis of the “No Action” alternative.
- The applicant failed to identify all land meeting the definition of “farm” land.
- The proposed route does not meet a test of being a “reasonable” route as defined by *Friends of Parrett Mountain v Northwest Natural Gas Co.* 336 Or. 93, 108 (2003) due to the fact that it lacks “fairness”, is not “just, moderate, or suitable under the circumstances”. The proposed route fails to utilize available public lands and instead places the burden of impacts of the transmission line on unwilling private landowners.

Morrow and Malheur Counties are the only ones where the transmission line use of public land as opposed to private land is roughly equivalent to the percentages of each type in the county.

Baker County contains fifty one percent public land and 49% private land. The Boardman to Hemingway transmission line would be built using 83% private land and only 17% public land.

Union County contains 50% public and 50% private land. Idaho Power plans to build the transmission line on 19% public and 81% private land in this county.

Umatilla County contains 75% private land, however, the B2H transmission line would be built on 100% private land.

Due to the above, the applicant fails to comply with OAR 345-021-0010 and cannot be found to comply with OAR 345-022-0030 requiring a serious effort to identify a route which minimizes or avoids the impacts on EFU lands.

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B2H EFSC Exhibit K APPLICANT FAILED TO INCLUDE ALL EFU LANDS FOR PURPOSES OF 215.275 ANALYSIS

Exhibit K, 4.1.1.4 Non-EFU Alternatives

Idaho Power failed to include all farm land in the analysis required by ORS 215.275. Of critical concern are items (4) requiring restoration of agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility.

And (5) requiring that there be clear and objective conditions on the application for utility facility siting to mitigate and minimize 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.

Idaho Power's analysis failed to include lands zoned as a combination of rangeland and farm use as farm land subject to the provisions of ORS 215.275

The failure to include all required land in the analysis results in a lack of compliance with the requirements of OAR 345-021-0010(l)(k) and OAR 345-022-0030. Due to this omission, the council cannot find the developer in compliance with ORS 469.504 or ORS 197.646 or OAR 345-022-0030.

The applicant states, "Several of the agricultural areas in the project area are zoned a combination of rangeland and farm use. Based on discussions with DLCD, IPC did not consider such hybrid zoned lands to be EFU lands for purposes of the ORS 215.278 analysis." This statement is not DOCUMENTATION as required for the application to be complete. There is no indication of who spoke with whom on what date, and nothing to document that the action actually occurred. Following is documentation taken directly from the LCDC rules that the combination zones are EFU and are required to be included in the ORS 215.278 analysis as well as the dictionary, IRS and FDA definitions of farm use which are consistent with the LCDC definition.

LCDC defines Exclusive Farm Use Zone in ORS 215.203(2)(a) as "farm use" means **the current employment of land for the primary purpose of obtaining a profit in money by raising, harvesting and selling crops or the feeding, breeding, management and sale of, or the produce of, livestock, poultry, fur-bearing animals or honeybees or for dairying and the sale of dairy products or any other agricultural or horticultural use or animal husbandry or any combination thereof.----**"

Oxford Dictionary defines “farming” as “The activity or business of growing crops and raising livestock”

The Internal Revenue Service defines “farm” as “includes stock, dairy, poultry, fruit, furbearing animal, and truck farms, plantations, ranches, nurseries, ranges, greenhouses or other similar structures used primarily for the raising of agricultural or horticultural commodities, and orchards and woodlands.”

The FDA defines “farm” as “an establishment under one ownership in one general physical location devoted to the growing and harvesting of crops, the raising of animals (or seafood), or both”

A failure to include all farm land in completing the requirements of ORS 215.275 means the applicant is not in compliance with OAR 345-022-0030 which is required in order to issue a site certificate or determine whether or not the application meets the standards. This understatement of farm lands is especially problematic due to the decision *Friends of Parrett Mountain v. Northwest Natural Gas Co.*, 336. iOr. 93, 108 (2003) requiring the determination to be "reasonable" meaning fair proper, just, moderate or suitable under the circumstances". This transmission line is being sited on a far greater percentage of agricultural private land in counties where the public land includes a much greater percent of the total lands in the counties. The omission of most agricultural lands from the 215.275 analysis also means that the stated percentage of total farm lands being taken from the counties is significantly understated.

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**EFSC LACKS AUTHORITY TO APPROVE CONSTRUCTION OR
MODIFICATION OF ROADS OR OTHER DEVELOPMENT OUTSIDE THE
SITE BOUNDARY FOR THE BOARDMAN TO HEMINGWAY
TRANSMISSION LINE.**

The Oregon Department of Energy and Energy Facility Siting Council span of control for approving development is limited to the area within the site boundary. In order to be covered under the site certificate, roads or other construction must be included in the site boundary. The decision regarding whether or not to include these areas in the site was made by the developer. They chose to limit the area of the site to exclude some of the roads they planned to modify or build. Due to this decision, these areas must be approved through the local county or city planning process. They do not fall under the rules contained in OAR 345-022-0030.

Prior decisions and a contested case decision by the Energy Facility Siting Council support the above, for example: The Oregon Department of Energy and Energy Facility Siting Council allowed Wheatridge Wind Development to not include the gen-tie transmission line in the site certificate. That decision gave control of the gen-tie line, roads and other actions related to building the transmission line to the contractor and the developer and removed the Oregon Department of Energy and Energy Facility Siting Council from involvement.

Definitions contained in the Oregon Statutes and EFSC Rules clearly define the area which is controlled by the site certificate.

1. A site certificate by definition contained in ORS 469.300(26), ORS 469.401` (4) and ORS 369.503(3) means “the binding agreement between the State of Oregon and the applicant, authorizing the applicant to *construct and operate a facility on an approved site*, incorporating all conditions imposed by the council on the applicant.”
2. The “site” is defined in ORS 469.300 as “any proposed location of an energy facility and related or supporting facilities.”

3. ORS 469.300 also defines "Related or supporting facilities" as "means any structure, proposed by the applicant, to *be constructed or substantially modified* in connection with the construction of an energy facility, including associated transmission lines, reservoirs, storage facilities, intake structures, road and rail access.-----"

4. ORS 469.401(4) and ORS 369.503(3) state that the council does not have jurisdiction over matters that are not *included in and governed by the site certificate* or amended site certificate.

In construing a statute, you may not "insert what has been omitted, or ***omit what has been inserted." ORS 174.010.

The area of EFSC control of modifications to existing roads or development of new roads is also contained in counsel standards contained in OAR 345-001-0010 including:

5. (54) "'Site" as defined in ORS 469.300. "Energy facility site" means all land upon which an energy facility is located or proposed to be located. "Related or supporting facilities site" means all land upon which related or supporting facilities for an energy facility are located or proposed to be located.

6. (55) "'Site boundary" means the perimeter of the site of a proposed energy facility, its related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant."

7. (56) "'Site certificate" as defined in ORS 469.300." "means the binding agreement between the State of Oregon and the applicant, authorizing the applicant to *construct and operate* an energy facility *on an approved site*, incorporating all conditions imposed by the state on the applicant."

The above definitions, particularly the definition of "site certificate" in the statute clearly limit the extent of the Oregon Department of Energy and Energy Facility Siting Council evaluation and control to activities occurring on the "site" as defined in the above rules and statutes and impacts those development activities occurring on the site have on the surrounding area. Any modifications to road segments or new roads which are not included in the site boundary are outside the jurisdiction of the Energy Facility Siting Council. The site certificate cannot authorize exceptions to local or state land use goals or plans in order to approve development outside the site.

The applicant claims on Page K-216 of their application that the access roads and other such facilities outside the site boundary are related and supporting facilities. Since the applicant chose not to include these facilities in the site certificate, they are not related or supporting facilities. The Energy Facility Siting Council and the Department of Energy made this very clear in the contested case decision regarding the developer's choice not to include the gen-tie line in the site for the Wheatridge Wind Facility. That decision was incorporated into the Final Order for Wheatridge Wind Facility issued April 2017. For example: Page 1, Line 10 states "A site certificate is a binding agreement between the State of Oregon and the applicant, authorizing the applicant to design, construct, operate, and retire a facility on an approved site, incorporating all conditions imposed by the Council on the applicant" In the footnotes on that page there is additional comment relating to this issue, "On the record of the public hearing, Ms. Gilbert/FGRV requested that the Council impose a condition restricting construction and construction impacts to the area within the site boundary. In response, on the record of the June 6, 2016 public hearing, the applicant stated that a specific condition limiting impacts to within the site boundary should not be required as this limitation is self-implementing through approval of the site boundary and site certificate. The department generally agreed with the applicant's statement. Construction activities must be restricted to areas within the site boundary, which as defined at OAR 345-001-0010 means the perimeter of the site of the proposed energy facility, its related or supporting facilities, all temporary lay-down and staging areas and all corridors and micro-siting corridors. Once issued, the site certificate becomes a binding, contractual agreement between the certificate holder and the State of Oregon, which authorizes the certificate holder to design, construct, operate and retire a facility only on an approved site, incorporating all conditions imposed by the council."

The applicant's reference to OAR 660-006-0025(4)(q) applies only to transmission lines. The applicant's reference to 215.283(1) talks to dwellings related to farm use. These arguments are moot since decisions regarding the roads or any other construction activities outside the site boundary are not included in the site certificate.

Respectfully submitted,

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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 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 the La Grande 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 the citizens of La Grande.

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.

Respectfully submitted,

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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

As I'm sure you all are aware, 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!**

Respectfully submitted,

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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

The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line. As I am sure you are all well aware, the National Historic Oregon Trail Interpretive Center, along with the Oregon National Historic Trail, are **"AREAS OF CRITICAL ENVIRONMENTAL CONCERN."** **These are areas, including Birch Creek, Flagstaff Hill/Virtue Flat and the Oregon National Historic Trail, which are areas that are supposed to be protected by the BLM for public tourism.** As such, the BLM has the fiduciary responsibility to protect these areas.

B2H crosses the Oregon Trail at least eight (8) times, which will defile and desecrate the historic path of the greatest migration in US history. Nowhere are these wagon trail ruts so pronounced and, to that end, in need of protection. Again, the BLM has the fiduciary responsibility to protect these areas.

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.

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 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 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 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° 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 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 site certificate for the Boardman to Hemingway Transmission project.

Respectfully submitted,

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Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by 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.

Respectfully submitted,

JoAnn Marlette
2031 Court Street #8
Baker City, OR 97814

Phone: 541-523-5851

Email: garymarlette@yahoo.com

TARDAEWETHER Kellen * ODOE

From: Kaz Marlette <kkmarlette@sbcglobal.net>
Sent: Monday, August 19, 2019 2:42 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: B2H - Objection Letter 1.docx

Please find the attached file.

August 19, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street 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 5/23/2019

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!**

Kaz Marlette
1815 20th St.
Baker City, OR 97814

kmarlette@sbcgloabal.net

TARDAEWETHER Kellen * ODOE

From: Kaz Marlette <kkmarlette@sbcglobal.net>
Sent: Monday, August 19, 2019 2:43 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: B2H - Objection Letter 2.docx

Please find the attached file.

August 19, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street 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 5/23/2019

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,

Kaz Marlette
1815 20th St.
Baker City, OR 97814
kkmarlette@sbcglobal.net

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

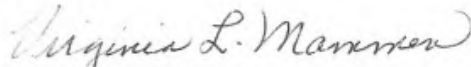
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

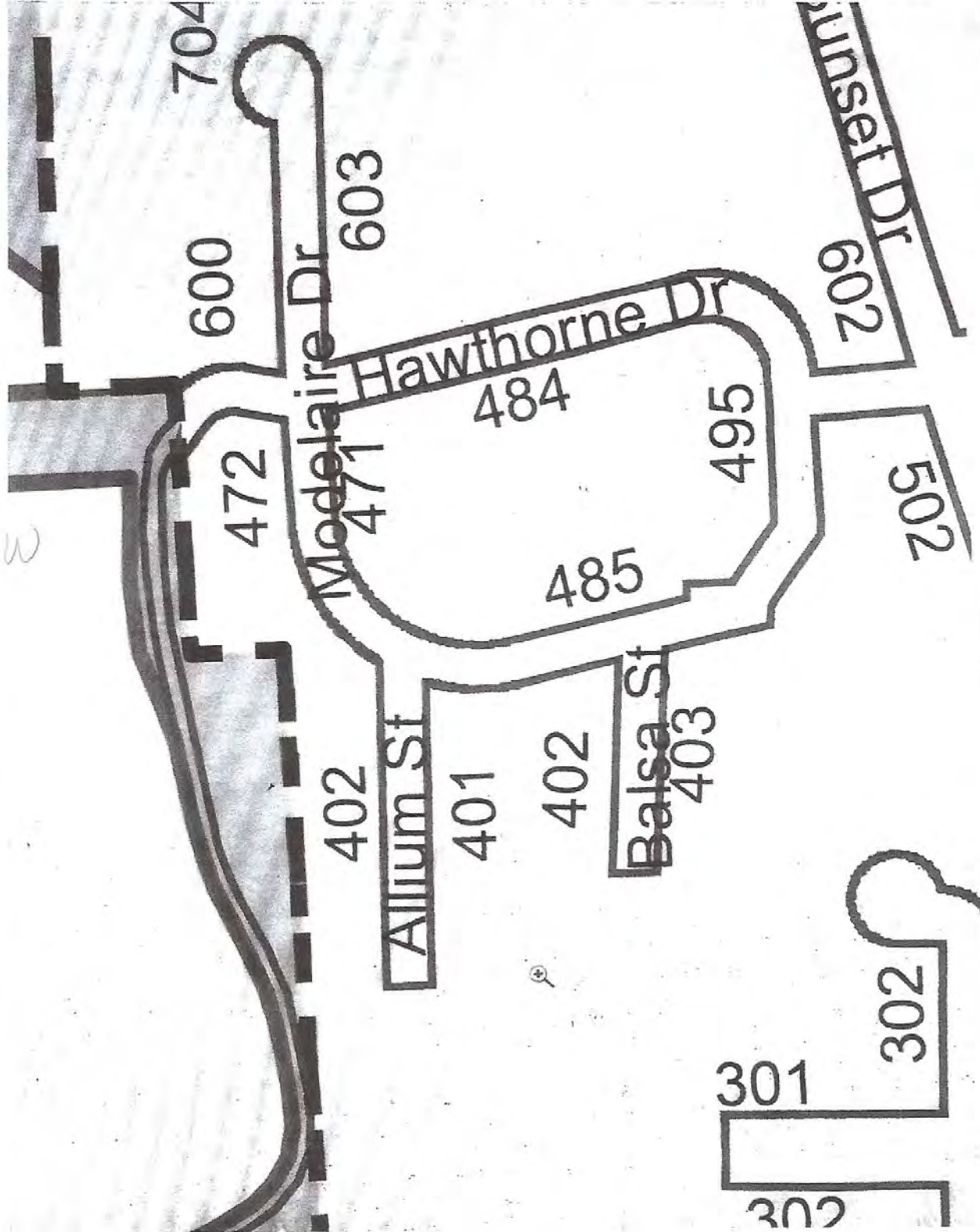


Exhibit 3

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



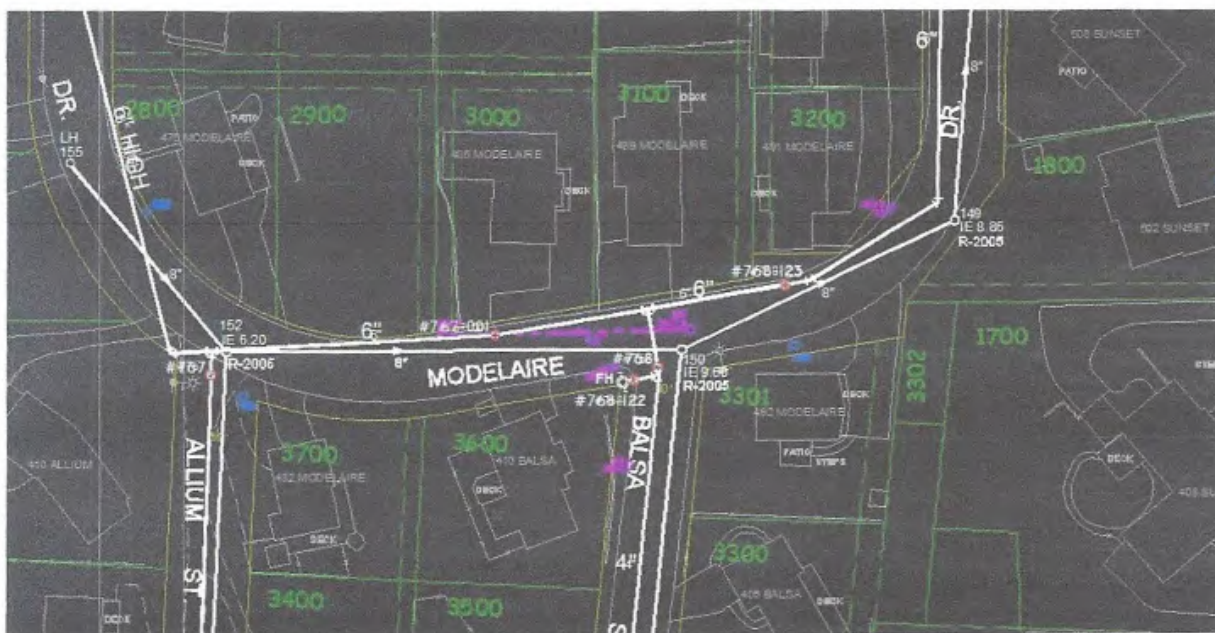
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

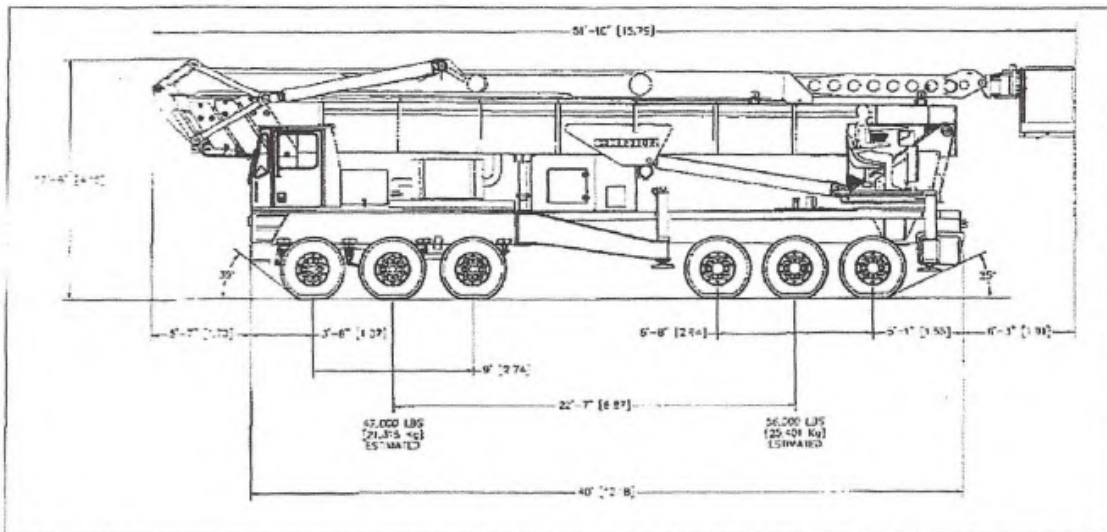


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

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

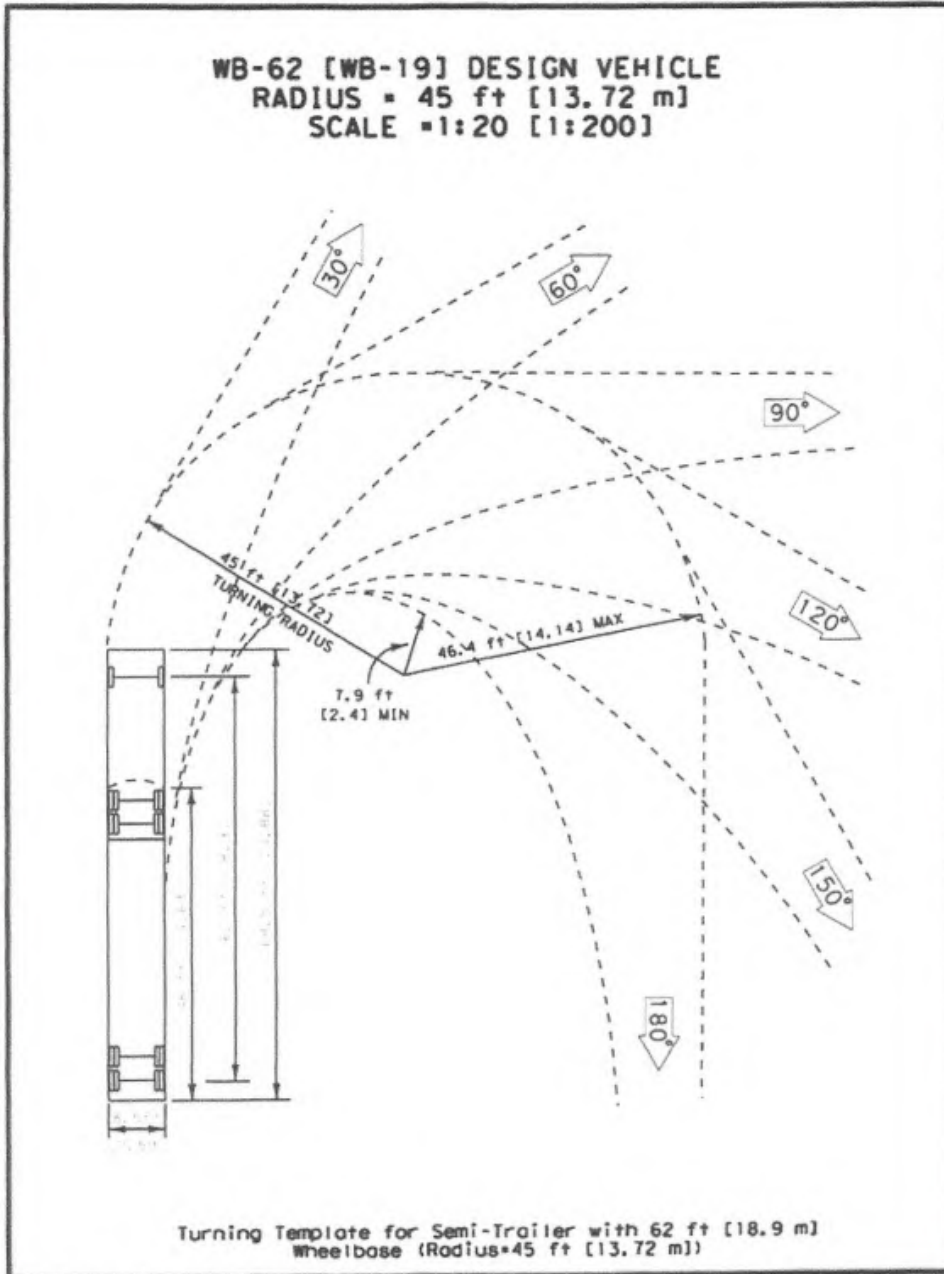


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

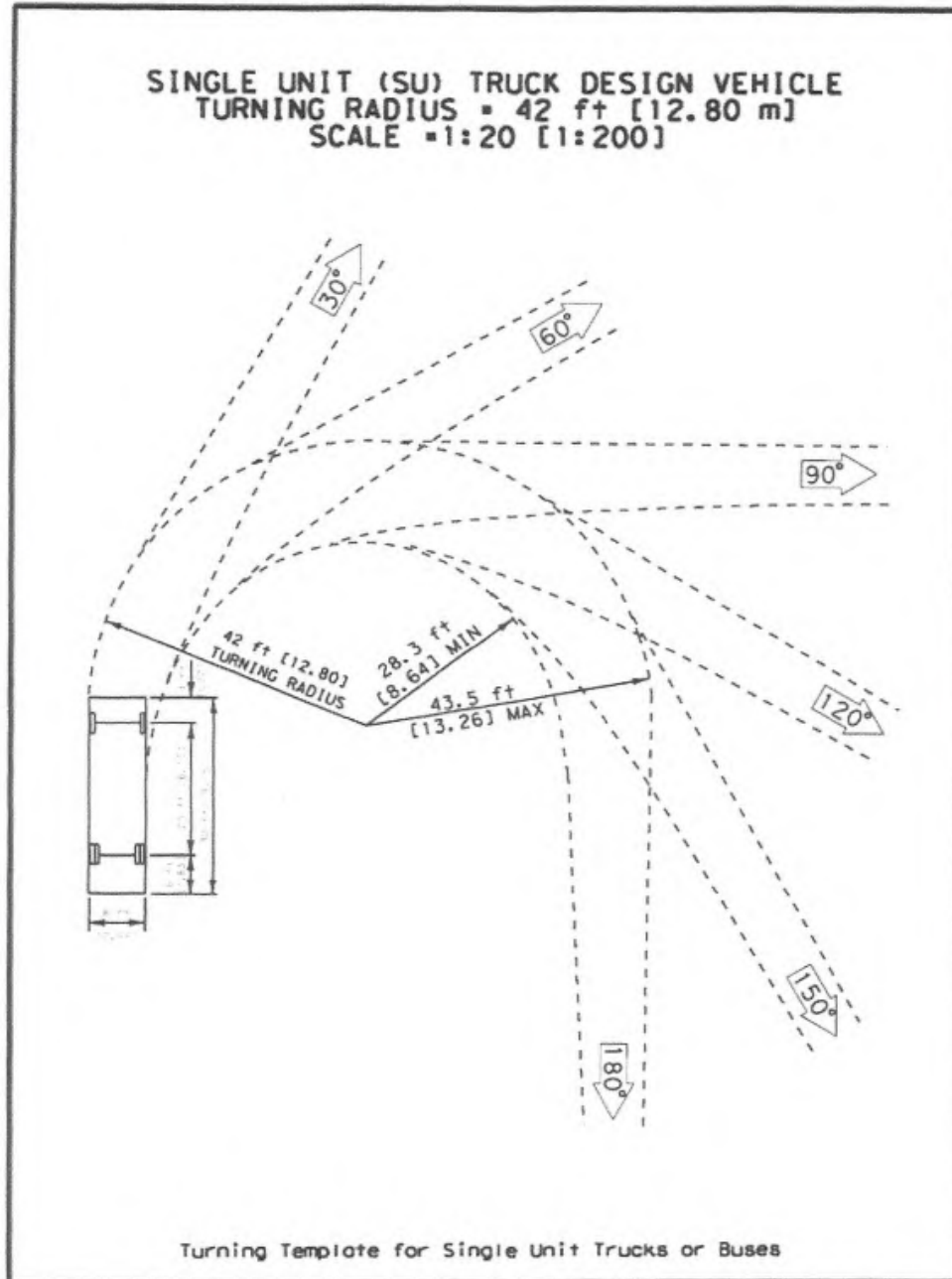


Exhibit 15

**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.

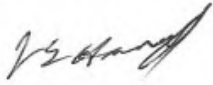
Section 17. TRUCK ROUTES

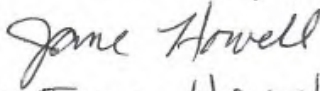
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

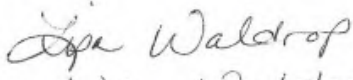
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

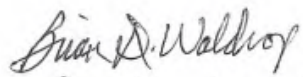
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

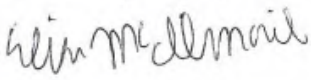
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
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SIGNATURE

PRINTED NAME

ADDRESS

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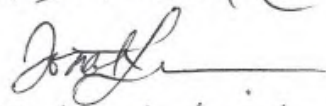

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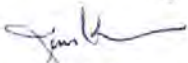
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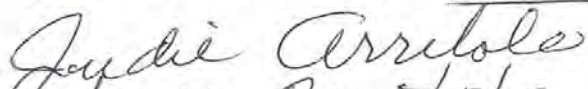
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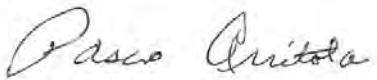
Blake Bars
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blakebars@gmail.com


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.

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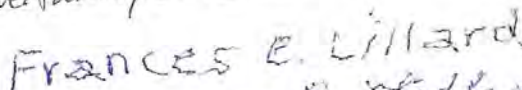
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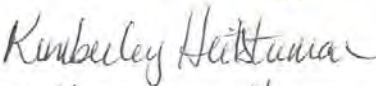
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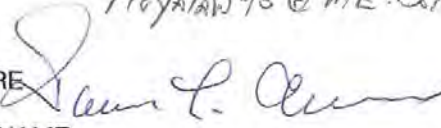
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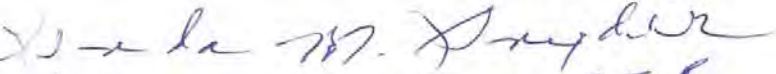
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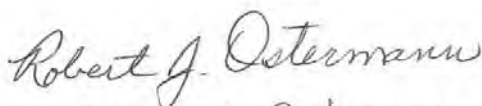
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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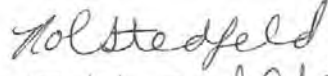
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EMAIL

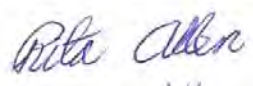
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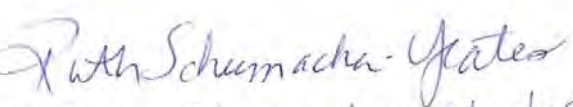
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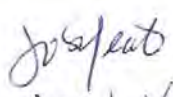
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SIGNATURE 
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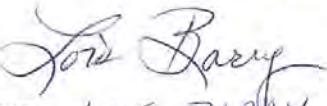
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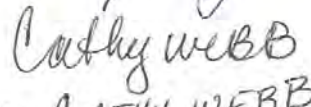
SIGNATURE 
PRINTED NAME Rita Allen
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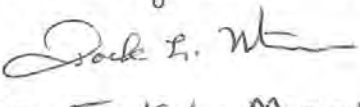
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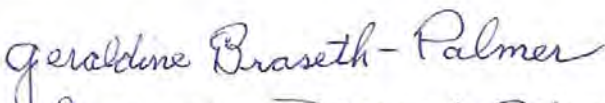

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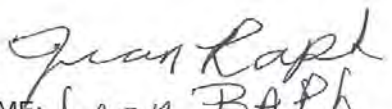
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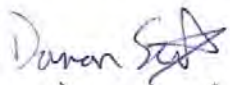
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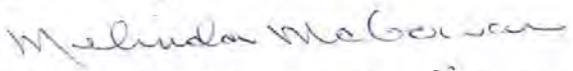
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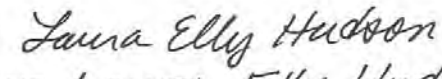
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SIGNATURE *Gary D. Pierson*
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EMAIL asherer@frontier.com

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
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PRINTED NAME CAROL S. SUMMERS
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EMAIL carolsummers1935@gmail.com

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

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

SIGNATURE
PRINTED NAME
ADDRESS
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PRINTED NAME
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EMAIL

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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


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

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

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

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

Sincerely,

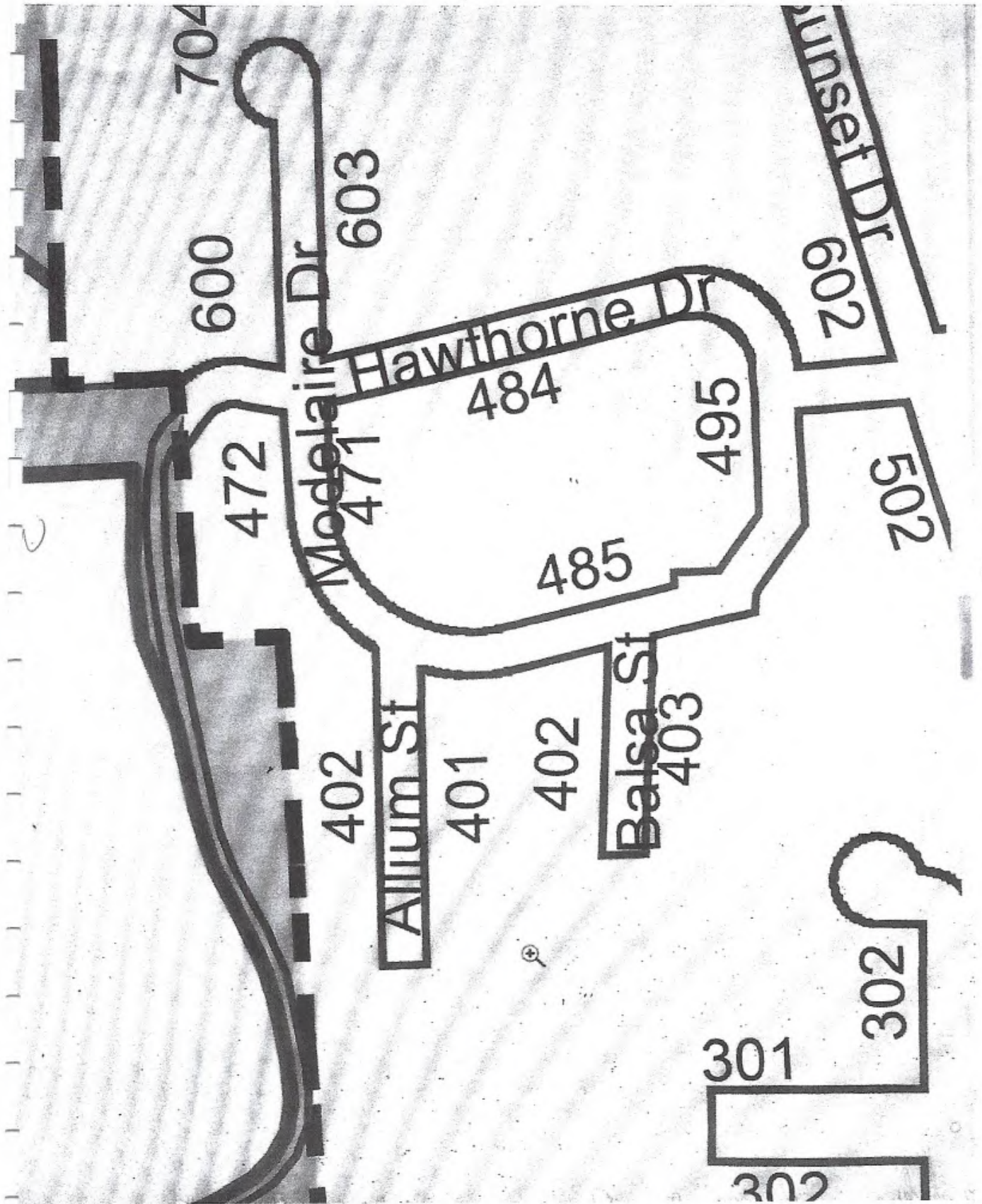


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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.

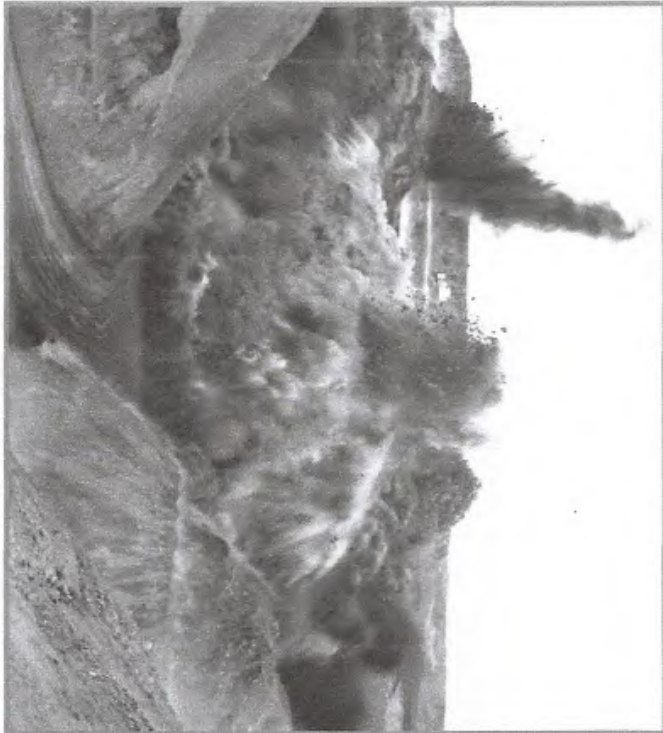
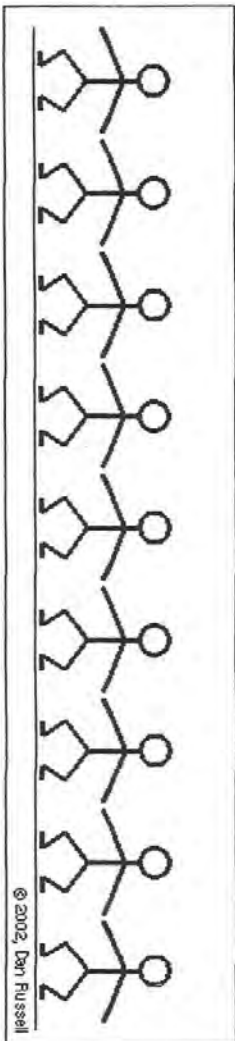


Exhibit 56

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.

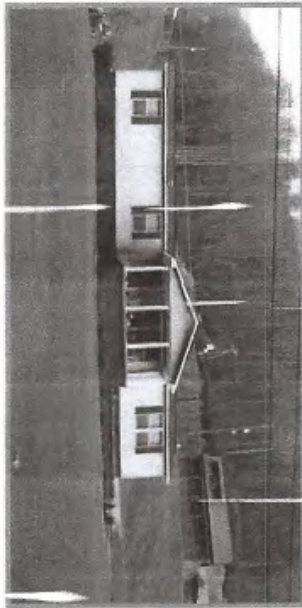
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior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

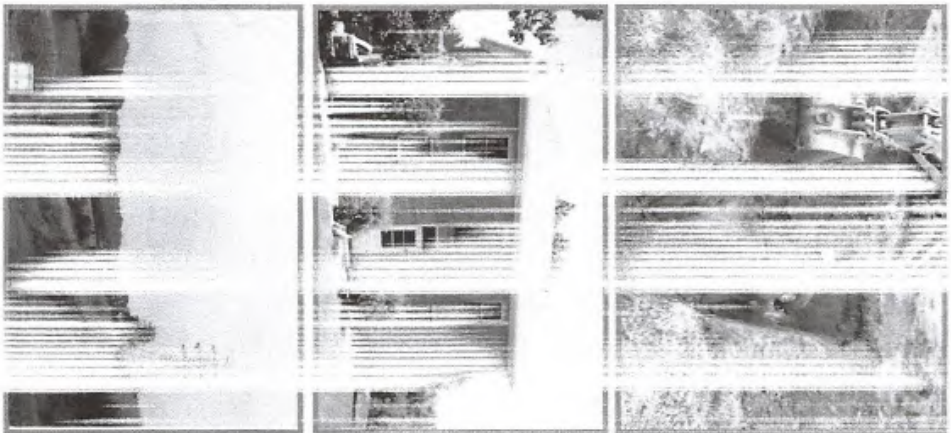
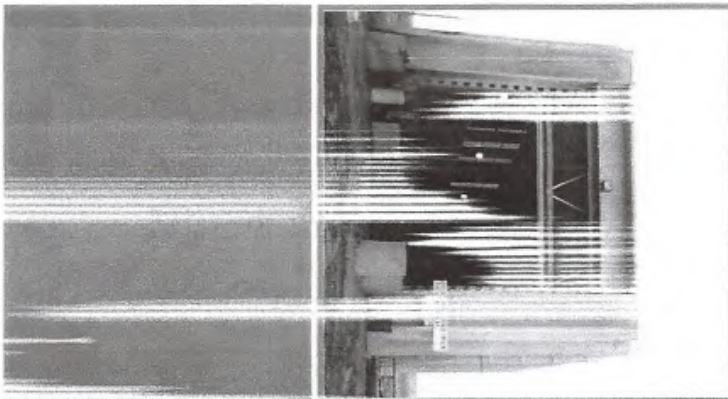
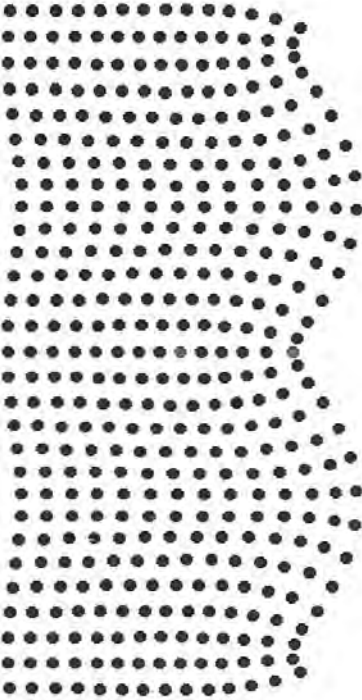


Exhibit 5D

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

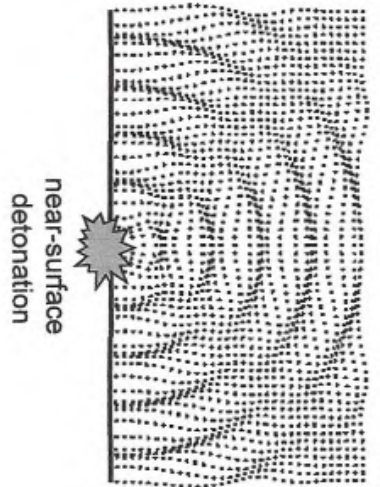
Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

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

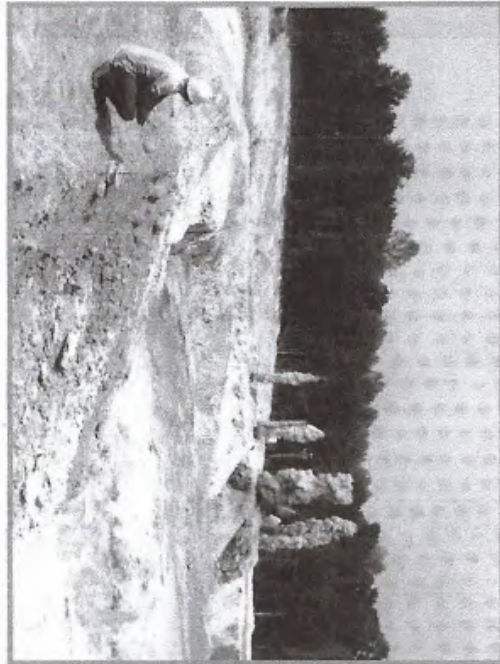
Exhibit 5
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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.



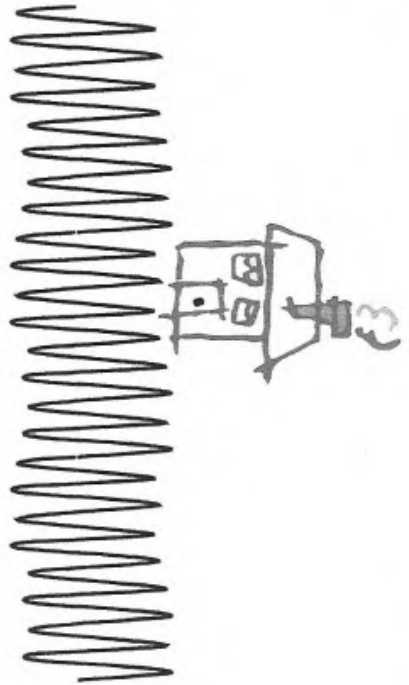
Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

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.

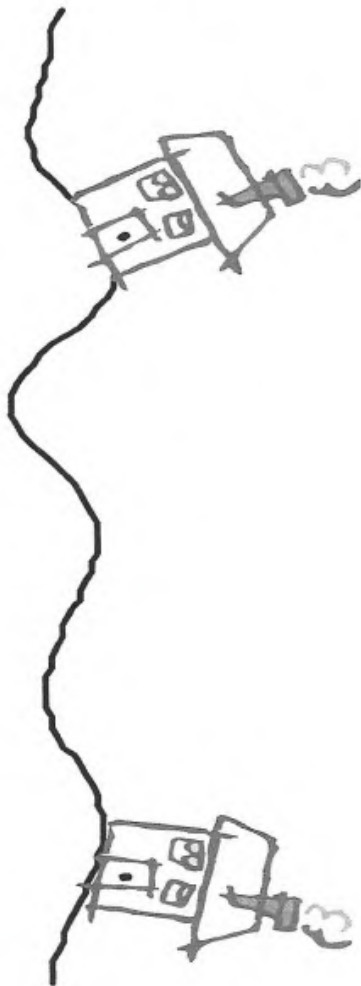


Ground Vibration Structure Response

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



Harvard Health Publishing
HARVARD MEDICAL SCHOOL

Trusted advice for a healthier life

A noisy problem - Harvard Health

Exhibit 16
CART | FREE HEALTHBEAT SIGNUP | SHOP | SIGN IN

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What can we help you find?



HEART
HEALTH

MIND &
MOOD

PAIN

STAYING
HEALTHY

CANCER

DISEASES &
CONDITIONS

MEN'S
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



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

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

Home

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Headlines in Health

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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

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

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Abstract

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

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

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
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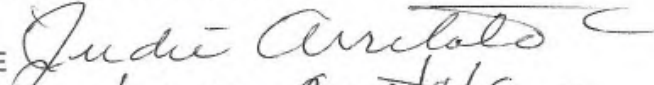


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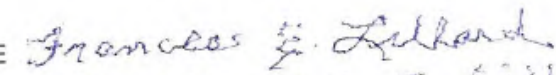
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to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

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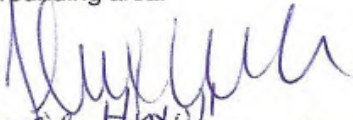
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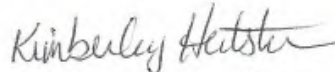
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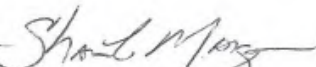
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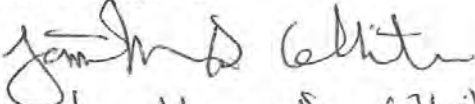
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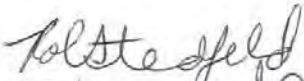
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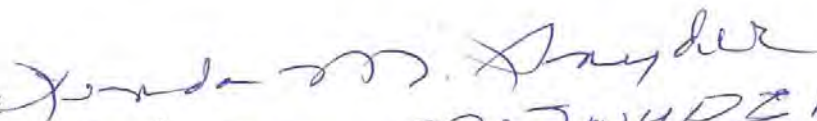
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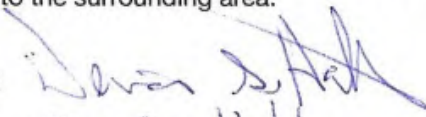
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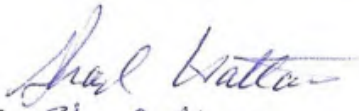
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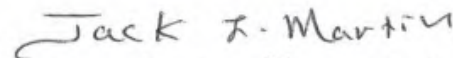
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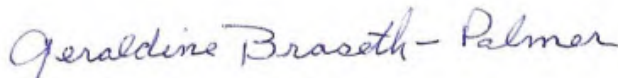
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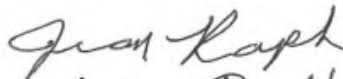
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1602 Gildcrest Drive - LaGrande, Or; 97850

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
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL sexton.damon@gmail.com

SIGNATURE *Coy Sexton*
PRINTED NAME Coy Sexton
ADDRESS 401 Balsa Street, La Grande, OR 97850
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SIGNATURE *Melinda McGowan*
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE
PRINTED NAME
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SIGNATURE
PRINTED NAME
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SIGNATURE *Lois Barry*
PRINTED NAME LOIS BARRY
ADDRESS P.O. Box 566, LA GRANDE, OR 97850
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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

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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. Cavinato*
PRINTED NAME Anne G. Cavinato
ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL acavinot@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR. 97850
EMAIL joehorst@conic.com

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

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

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

SIGNATURE *Carol Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekelen 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
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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@coni.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: Patti Martin <pgoldenmartin@gmail.com>
Sent: Thursday, August 22, 2019 4:37 PM
To: B2H DPOComments * ODOE
Subject: Concerned citizen
Attachments: B2H concerned citizen.docx

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

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

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

RE: Anadromous Fish in Ladd Creek, Union County

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

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

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

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

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

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

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see <https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151>).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see <https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648>). Construction has resulted in costs over 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service (see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and ([PPT] Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species (ESA). The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

The B2H Draft Proposed Order contains the following outdated information:

1. In *Table 1. Road-Stream Crossing Ownership, Risk Summaries, Proposed Crossing Types, and Fish Passage Information* Idaho Power names 5 waters in the Ladd Creek area (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*) with stream crossings. The report states that the only fish in these waters are resident fish. This information is now incorrect.
2. The B2H Draft Proposed Order states that for all of Ladd Creek and its tributary streams that “No new ODFW fish plan anticipated.” (page 9-11 of Attachment BB-2). It cannot be overemphasized that this information is now incorrect.
3. The alternative route Idaho Power has chosen will necessitate a 3a/3b (page 11 BB-2) design change for a bridge crossing on Ladd Creek if this route is chosen, this will trigger an ODFW fish passage plan to be implemented (OAR 17 412-0035) based on Oregon Administrative Rules (OAR) 635-412-0020. Again, the B2H Draft Proposed Order information is now incorrect.

Because of the change of status of the fish population in Ladd Creek, the B2H Draft Proposed Order is out of compliance with several Federal and State laws including:

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

- (a) The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality.

- (b) The Department shall act to achieve the mitigation goal for Category 2 habitat by recommending or requiring:
- (A) Avoidance of impacts through alternatives to the proposed development action; or
 - (B) Mitigation of impacts, if unavoidable, through reliable in-kind, in-proximity habitat mitigation to achieve no net loss of either pre-development habitat quantity or quality. In addition, a net benefit of habitat quantity or quality must be provided. Progress towards achieving the mitigation goals and standards shall be reported on a schedule agreed to in the mitigation plan performance measures. The fish and wildlife mitigation measures shall be implemented and completed either prior to or concurrent with the development action.
- (c) If neither 635-415-0025(2)(b)(A) or (B) can be achieved, the Department shall recommend against or shall not authorize the proposed development action.

In conclusion, the B2H Draft Proposed Order contains an improper evaluation of the potential short and long term negative impacts to the fish habitat in the Ladd Creek drainage, including surrounding creeks, given the fact that species listed as threatened under the Endangered Species Act are now returning to Ladd Creek, with their numbers expected to increase in upcoming months and years.

Sincerely,

Patti Martin
100 Rose Hill Court
La Grande, OR 97850
pgoldenmartin@gmail.com
(541) 605-8478

TARDAEWETHER Kellen * ODOE

From: Lindsey Martin-Bowen <lindsey.martin-bowen@outlook.com>
Sent: Friday, August 16, 2019 9:54 PM
To: DPOComments@Oregon.gov; B2H DPOComments * ODOE
Subject: Confirmation copy of Slope Instability snail mail (Pls see attachment for a cleaner copy: Idaho Poer Application for the B2H Transmission)
Attachments: LMB ODE Idaho Power B2H Slope Instability 08-17-19.docx

1701 1st Street
La Grande, OR 97850-1503
August 17, 2019

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

In re: Idaho Power Application for the Boardman to Hemingway (B2H) Transmission Project
September 28, 2018: Draft Proposal Order May 23, 2019
Slope Instability

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Then, I recently learned about B2H. This proposed transmission line construction frightens me. It reveals Idaho Power's blatant disregard for La Grande residents, wildlife ecosystems, and wildfire hazards. In fact, although the ***Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN*** appalls me, ***Idaho Power's neglect to consider the active fault in the West Grande Ronde Valley Fault Zone appalls me even more. It threatens all La Grande residents and wildlife.***

In short, Idaho Power's B2H Proposal is unconscionable.

Its proposed route to the west of La Grande is on an unstable ridge noted for its high risk of landslides. Idaho Power's geologic study also references several studies (below) that illustrate this. **Table H-2: USGS Quaternary Faults within Five Miles of Project by County** (on page H-12) is to be placed on **an active fault** in the West Grande Ronde Valley Fault Zone. Further, Exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, indicates much of the erosion hazard is rated "**severe**."

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To Chairman Beyeler
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This slope instability remains a crucial concern. In 2014, significant rainfall on the logging disturbance of soil upslope from the town resulted in a catastrophic mudslide in Oso, Washington. Forty-three persons died in this catastrophe. Ignoring geologists’ warning could result in a similar disaster here in La Grande, especially when the **Grande Ronde Hospital and Clinics (this region’s critical access unit employing hundreds of employees, lies down slope from the B2H line.**

In the same vein, La Grande High School and Central Elementary School are also down slope from the proposed towers, along with at least, 100 homes. Schlicker and Deacon’s 1971 maps, “Engineering Geology of the La Grande Area, Union County, Oregon, also deem the hillside’s **entire** area a “landslide area” in the La Grande SE quadrangle.

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Instructor, Criminal Justice Department
Blue Mountain Community College

Dr. Lindsey Martin-Bowen, J.D.
Poet, Fiction Writer
College Writing/Literature Teacher, and
Criminal Procedure (Blue Mountain Community College)



<https://39westpress.com>

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Instructor, Criminal Justice Department
Blue Mountain Community College

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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) Isaac Martinez

Mailing Address (mandatory) 673 Martinez Dr
Nyssa, Ore 97913

Phone Number (optional) 541-372-5191 Email Address (optional) _____

Today's Date: 6-18-19

Text to 760-669-4644

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.)

Please keep me notified

ESTERSON Sarah * ODOE

From: Shane Matheny <mathenysh@hotmail.com>
Sent: Thursday, August 22, 2019 4:03 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project
Attachments: B2H document.docx

To: State Department of Energy, Energy Facilities Siting Council

My name is Shane Matheny. John Luciani and I lease farm ground from the Van Buren trust that the proposed B2H route will affect. Having the power line run along the edge of this farm would affect us greatly. First, it would take acres of farm ground out of production. Second it would increase spray costs. Aerial spray applications will be limited; the planes will not spray within a thousand or two thousand feet of the towers.

When building the power line the equipment would compact and disturb or scar the ground. Roads would have to be built that again would take acres out of production and bring more people on the ground year round. Land erosion is a big concern of mine during the building process.

We will also be forced to work under the power lines. This could be dangerous due to electrical shock from non-grounded equipment. We are a family ran farm. I do not want to put my family members at risk working under this line.

We experience a lot of lighting in the summer time. The ground is dry and our wheat crop is ready to harvest. Last year we had a lightning strike hit a small power line by our house. It started a fire and started burning along the hill towards the house. Luckily the field was in fallow and we had finished harvest. Having a power line that is three to four times bigger than the line the lightning hit is a problem. Our wheat crop/livelihood is underneath these lines!

Visual impacts are real. Having to look at the power lines would affect us daily. Not to mention it would lower the property value of the land.

The existing I-84 corridor is already in place. This is where the line needs to be placed, not on forest ground, farming and ranching properties. Private lands purchased in the corridor, where purchased knowing that more lines could or would be built on the ground in the corridor. Please place the lines where they were intended to go.

Thanks for your time. Please do not allow the permitting of this project.

Shane Matheny

L & M Land and Cattle



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) MICHAEL MCALLISTER

Mailing Address (mandatory) 60069 MORGAN LK RD
LA GRANDE OR 97850

Phone Number (optional) 541 786 1507 Email Address (optional) _____

Today's Date: 6/20

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.)

<p style="text-align: right;">Page 126</p> <p>1 litigation that had proven that. So I have to trust 2 them on that, I guess. 3 I think you'll have to understand, I'm a 4 little bit skeptical about this. Idaho Power hasn't 5 been -- I haven't been contacted -- I mean, I have now. 6 But through this planning process, I really wasn't 7 contacted. Nobody came to my place and looked at the 8 site. I don't know if they know there is a pond right 9 next to where they want to put this tower. I don't know 10 if they understand I had to put a well in 700 feet deep, 11 the water is amazing. I don't know if that will change. 12 The road coming up Hawthorne has to have a lot 13 of annual maintenance on it for just three houses. The 14 idea of them hauling that heavy equipment, and I don't 15 know what they are going to do to improve or better that 16 road, my concern is they will make it worse. Only 17 because of the limited history that I've had with them 18 hasn't really been very supportive. Tonight was the 19 first night that I got a chance to listen to this many 20 people talk about their concerns. 21 Honestly, I'm more concerned now than before I 22 came in. I have heard a lot of information tonight that 23 kind of would make, I think, anybody in my shoes afraid 24 of the future of what's going to happen up there. I 25 love this place. I think it's going to change</p>	<p style="text-align: right;">Page 128</p> <p>1 For everybody here, if you are to looking at 2 the computer screen that's up on the back wall, there is 3 a third power line, which is the green route. There is 4 red, green, and yellow. And I'm pleased to see that the 5 green line was turned on this evening. It wasn't on 6 when I originally looked at it. 7 I also came in late and I was told that I'm 8 not supposed to advocate for the western route 9 recognized by the BLM and environmental analysis because 10 it has not been applied for. That route is what I've 11 been involved with advocating for for 10 years now, 12 since day one, really. 13 I think I probably wrote Adam Bless, with the 14 Oregon Energy Council, probably the first letter he 15 received with my concerns about siting this line through 16 Union County here. And with an empirical background for 17 virtually every acre of the stretch from Hilgard to Ladd 18 Canyon that probably nobody else has, I feel like it's 19 my community contribution to represent it as completely 20 and as well as I can. 21 The green route is by far the superior route 22 when you consider just about any aspect; fish, forest, 23 wildlife, range, fire, feasibility, all the above. In 24 my analysis collecting facts relative to all these 25 resources, the green route is by far the best route.</p>
<p style="text-align: right;">Page 127</p> <p>1 dramatically. That is all I have. 2 HEARING OFFICER WEBSTER: Thank you. 3 Following Mr. McAllister we have Charles 4 Gillis on deck. 5 MR. MICHAEL McALLISTER: I'm Michael 6 McAllister. I live at 60069 Morgan Lake Road right at 7 the top where you confront the wind as you break the 8 summit. 9 I am of the Move B2H camp, an advocate of 10 moving and have been for at least 10 years, when the 11 initial proposed route was presented. I am a natural 12 resource inventory expert, and made a career 13 inventorying fish, forest, wildlife, range, ozone 14 damage, carbon sequestration. I collect facts from the 15 landscape and have been in La Grande since 1979, when I 16 lived right below lower Morgan Lake, which apparently is 17 not recognized by Idaho Power. 18 The eagles built two nests right above my wall 19 tent where I lived as I went to school here at Eastern 20 Oregon University. And it's really a pleasure to be 21 here tonight with the community and hearing all of their 22 different concerns and considerations. It's always been 23 above my mental capacity to explore the rightness or 24 wrongness of the power line; so I have focused on moving 25 B2H.</p>	<p style="text-align: right;">Page 129</p> <p>1 And I can honestly say that it's a travesty that, for 2 whatever reason, Idaho Power has chosen to completely 3 disregard that route. I have seen no evidence in 4 10 years that Idaho Power has shown any consideration of 5 that route. I think it's appalling. 6 I do credit Idaho Power for having in the 7 10 years considered routes through John Day, extensively 8 routes through the Blue Mountains, and having recognized 9 the importance of not further fragmenting large-scale 10 forest tracks, and that the I-84 corridor is probably 11 the best route. But specifically through this neck of 12 the woods, through Union County, Ladd Canyon, I think 13 every concern I've heard here this evening can be 14 mitigated by placing this transmission line on the 15 environmentally-preferred route. 16 And I am providing comment, written comment 17 that will specify as well as I can with the time that I 18 have. I don't believe it's up to me to demonstrate a 19 burden of proof to this end, but I'm doing my best to do 20 that. 21 And I thank you all for your listening here 22 this evening. 23 HEARING OFFICER WEBSTER: Thank you. 24 Following Mr. Gillis, we will hear from, I 25 believe it's John Winters, if I'm reading that</p>

Michael McAllister, 60069 Morgan Lake Road, La Grande, Oregon, 97850, (541) 786-1507.

June 23, 2019

Todd Cornett, Energy Facility Siting Division Administrator, Energy Facility Siting Division, Oregon
Department of Energy, 550 Capitol Street NE, 1st Floor, Salem, OR, 97301, todd.cornett@oregon.gov .

Dear Mr Cornett,

On January 14, 2019, I delivered to you a letter (attached – page 2) to express my concerns about Idaho Power Corporations (IPC) “incomplete application” for *Site Certificate* of their **Boardman to Hemingway Transmission Line** through Union County. The application is incomplete because IPC did not include the Agency Selected Route, adopted by the National Environmental Planning Act (NEPA) process – conducted by the U.S. Department of Interior’s Bureau of Land Management.

This past Thursday – June 20, 2019 – the **Energy Facility Siting Council** held Public Hearing on the *Draft Proposed Order and Request for Comments* – here in Union County. I attended that meeting and I did make comments regarding my position with regards to Idaho Power Corporations Incomplete Application for Site Certificate.

In brief, the most significant point that I made was – the **Agency Identified Route A** would affectively mitigate nearly all the concerns expressed by the many attendee’s comments at that meeting.

Following the public comments, two representatives from Idaho Power were seated before the Siting Committee, this so that committee members could ask questions in response to the public comments previously made.

Committee Member Hanley Jenkins asked the only question and he phrased it this way – “**I am going to ask you one very hard question – why did Idaho Power Corporation not include the BLM Agency Identified Route into their Application?**”

Idaho Power’s Mark Stokes provided the following as an answer – **the BLM Agency Alternative was not included because their process was being drawn out – we were under time constraints to submit our application and went ahead without it.**

There were no further questions, and no further opportunity for the public to respond to this **Revelation.**

I have been involved over ten years in advocating for what is now the BLM Agency Identified Route A.

Idaho Power Corporation and others are currently processing an incomplete application. IPC has been asked to amend their application repeatedly, too include the **Agency Identified Route A**. This issue should not become a Contested Case.

Respectfully



Michael McAllister

RECEIVED

JUN 26 2019

DEPARTMENT OF ENERGY

Michael McAllister

January 14, 2019

Todd Cornett, Energy Facility Siting Division Administrator, Energy Facility Siting Division, Oregon
Department of Energy, 550 Capitol Street NE, 1st Floor, Salem, OR, 97301, todd.cornett@oregon.gov.

Dear Mr Cornett,

I am gravely concerned that Idaho Power Corporation (IPC) has submitted an incomplete application to Oregon's Energy Facility Siting Council (EFSC). Their application for *Site Certificate* of the **Boardman to Hemingway Transmission Line** through Union County does not include for consideration, the Agency Selected Route, adopted by the National Environmental Planning Act (NEPA) process – conducted by the U.S. Department of Interior's Bureau of Land Management. The two routes that IPC has applied for: **Proposed Route (B)** and **Morgan Lake Alternative (3)**, were developed late in the NEPA process and have not undergone environmental analysis or public comment. IPC's failure to gather satisfactory evidence has limited the ability of the public, EFSC, and other regulators in their ability to make fully informed decisions in the public interest.

I am requesting that Idaho Power Corporation amend their Oregon EFSC Application for Site Certificate to include the U.S. Bureau of Land Management's **Agency Identified Route A** for consideration by the State of Oregon EFSC board members. It is the only route that was fully subjected to environmental analysis and public comment during the Federal EIS. It was established through community consultation and environmental review in a multi-year process. It must be on the table for full consideration by Oregon EFSC for a "Complete Application" review.

I am Michael McAllister, a long-time resident of Union County and private contractor specializing in natural resources inventory and management. I hold a Bachelor of Science degree, *Wildlife Resources*, from the University of Idaho. As a 40-year resident on Morgan Lake road, I have an intimate knowledge of the geology, habitat, environmental issues, wildfire hazards and recreational value of the area. My interest is both professional and personal.

Oregon Department of Energy and Idaho Power Corporation records show that, since 2008, I have been encouraging Idaho Power Corporation to site the Boardman to Hemingway (B2H) Transmission Line in a manner, whereby the cumulative impacts of the Right-Of-Way will have a minimal impact on Oregon's public and their natural resources.

Attached is my comparative analysis of IPC's two routes (B and 3) and the BLM's Agency Selected Route (A). This analysis demonstrates that the Agency Selected Route minimizes risks to public safety and imposes the least impacts on the natural resources of both the City of La Grande and Union County.

At this time, I ask that Idaho Power Corporation amend their Oregon EFSC Application for Site Certificate to include additional environmental and community evidence regarding their proposed routes and to include the BLM *Agency Identified Route A* for consideration.

Respectfully



Michael McAllister

Public Comment: Michael McAllister

**Proposed Boardman to Hemingway Transmission Line
Site Certificate Application Review**

June 23, 2019

Introduction

The reader is advised to follow along using the Google Earth maps provided at <http://www.boardmantohemingway.com/LandownerMaps.aspx>. Expand the map to full screen and zoom in on Routes A, B, and 3 near La Grande, Oregon. Note you can switch between Earth View, Map View, and Topography View using the tab at the top left of the screen. To see vegetation coverages, use Earth View. To see geographic features switch to Topography View.

Map 3 (Union County) Legend:

- (A) – BLM Agency Selected Route (NEPA) - Route Color is Green on Map;
- (B) – Proposed Route (EFSC) – Route Color is Red on Map;
- (3) – Morgan Lake Alternative (EFSEC) – Route Color is Blue on Map.

Proposed Route B (EFSC)

IPC's Proposed Route has been identified as a best attempt to site B2H along the existing 230 kV transmission line as it passes through Union County. In 2008 and again in 2012, I asked that IPC construct their new B2H transmission line adjacent to the existing 230 kV transmission line passing through La Grande and Union County. After much further review of the evidence presented, I deemed that such a route would not meet the screens for the 500 kV transmission line for the following reasons:

- 1) The valley slopes to the west above La Grande are steep, with unstable geology; many areas have been identified by the U.S. Geologic Survey as unsuitable for construction.
- 2) La Grande's western skyline viewshed would be severely impacted. Both the City of La Grande and Union County have asked IPC to keep B2H out of their viewshed.
- 3) The "Powerful Rocky" stretch of Oregon Trail, and its archaeological artifacts, would be desecrated by the construction and continued maintenance requirements of the B2H towers.
- 4) Impacts to Oregon's Ladd Marsh Wildlife Management Area would be severe and permanent. Ladd Marsh was established as a wildlife mitigation area for past federal projects and the refuge should not be compromised. IPC itself recognizes and designates Ladd Marsh as "irreplaceable."

Based upon the above considerations, **Proposed Route (B)** has *High Cumulative Impact*, and few mitigation options.

Comparative Analysis of BLM Agency Selected Route (A) and Morgan Lake Alternative Route (3)

From here forward I will explain and contrast the **Agency Selected Route A**, with the **Morgan Lake Route 3**. The analysis begins at the Divergence Point – where Routes A and 3 diverge. The analysis then proceeds from north (DP), then south to the Convergence Point (CP) of the two routes near Ladd Canyon. The distance between DP and CP is approximately eleven miles for both Routes: A and 3. The elevation at DP (north end) is approximately 3,400 feet. The Elevation at CP (south) is approximately 4,800 feet. The Divergence Point is located near the middle of section 7, Township 3 South, Range 37 East, approximately 1.5 miles south of the Highway 244 junction with Interstate 84 at Hilgard. It is approximately 0.75 miles south of Highway 244, traveling south on the Whiskey Creek Road.

Geographic Setting

The biggest difference between the two routes is how each of them has been established geographically. This can best be recognized by comparison in *Topography View*. Recognize that the Grande Ronde Valley is the dominant geographic feature for the region, and further that it is oriented in a slightly northwest by southeast alignment - as is the Blue Mountain Range along the valley's west side. Recognize that from Divergence Point (near the Grande Ronde River at Hilgard) that the landscape rises as you go south following the west side of Grande Ronde Valley, all the way to near the Convergence Point above Ladd Canyon.

Now notice how the two routes, A and 3, ascend from 3,400 feet up to just over 5,200 feet elevation near the high point at Glass Hill. And notice that between the two routes there is a series of parallel ridges and drainages that are also oriented in the northwest by southeast alignment. This alignment is caused by the orientation of the faults associated with the origins of the Grande Ronde Valley. The highest of the fault generated-ridges is the one following the Mill Creek Fault – which also establishes the west edge of the valley. This highest ridge is known by geologists as the Glass Hill Monocline – **Morgan Lake Route 3 sites the transmission line along this monocline ridgetop.**

Comparatively, the Agency Selected Route A is the lower elevation route where the mean elevation is approximately 4,100 feet. See that from DP Route A proceeds southerly at an azimuth of approximately 150 degrees, along the same northwest/southeast geologic alignment. Route A gains elevation slowly as it moves up "Graves Ridge" in a straight line for approximately 5.0 miles. "Graves Ridge" is a broad gentle slope, where the only vegetation is sparse grass and forbs – much of it is rocky scab vegetation. The Graves Ridge Road (East Fork of the Whiskey Creek Road) mostly parallels the Route A with an elevation gain of about 200 feet per mile – a slope grade of just 5 percent. Importantly, note that existing roads provide excellent road access for at least two thirds of the Route A. These roads are bladed across solid basalt with few corners and no steep grades. Route A then makes only one turn, easterly to approximately 110 degrees. On this course, **Agency Selected Route A crosses the Rock Creek drainage 8.5 miles upstream from the Grande Ronde River – above the lower 6 miles deemed important to Threatened Snake River Chinook Salmon.**

Comparatively, the Morgan Lake Route 3 on the other-hand, moves east from DP and away from the Whiskey Creek Road. Route 3 then crosses the Rock Creek watershed just three miles up-stream of the Grande Ronde River. Note that there are four distinct drainages that make up the Rock Creek Watershed, from west to east they are: Graves, Little Rock, Rock, and Sheep Creeks. Notice that all four of the drainages converge near to where Route 3 crosses Rock Creek. There are no real existing roads

that access the north two thirds of Route 3. After crossing Rock and Sheep Creeks, Route 3 then intersects the Glass Hill Monocline (near Morgan Lake), where it turns southerly and follows the ridgetop. **Morgan Lake Route 3 is the high elevation route where the mean elevation across the route is approximately 4,500 feet.**

Soil Protection - OAR 345-022-022

The 400 feet mean elevation difference between (A and 3) is the predominant variable responsible for the difference in soils. The higher elevations along the top of the Glass Hill Monocline gather more precipitation, summer temperatures are cooler, more layered vegetation provide more shading, and windblown snow and soil particulates accumulate. The variability in soils is well demonstrated when you superimpose the **Union County Soil Survey Map** over IPC's Route Map overlay. Using this soils inventory, I have identified the four predominant soil types for both: **Route A and Route 3. They are listed here from most coverage, to least coverage:**

Agency Selected Route A, Soils are: 1) = 69C - *Watama-Gwinly complex*, is on biscuit-scabland uplands, vegetation is mainly bunchgrasses, and annual forbs; 2) = 35E - *Klicker-Anatone complex* - mountainous uplands where the native vegetation is mainly Ponderosa pine, bunchgrasses and elk sedge, a warm moist plant community suited to the production of pine, on a patchy basis - where soil is deep enough, also as rangeland and wildlife habitat. 3) = 4E *Anatone extremely stony loam* - is shallow, well-drained soil at ridgetops, and on south and west facing slopes where vegetation is mainly blue-bunch wheatgrass, Idaho fescue and stiff sage; used mainly as rangeland. 4) = 58E - *Starkey very stony silt loam* - shallow well drained soil on uplands, the vegetation is mainly bunchgrasses and annual forbs, Idaho fescue, blue-bunch wheatgrass and Sandberg bluegrass. The unit is used mainly for rangeland. Collectively, the soils makeup for Route A, tend to be shallower, and of residual decomposed basalt in its origin. The site index for timber production is lower, and shrubs are limited in the vegetation composition. **Agency Selected Route A crosses 44% forested acres - mostly warm dry plant communities. And it is noteworthy that Route A crosses 33% less timber acres than does Morgan Lake Route**

Morgan Lake Route 3, Soils are; 1) = 4E - *Anatone extremely stony loam*, is shallow, well drained, at ridgetops and on south and west facing slopes, derived predominately from basalt; vegetation is mainly blue-bunch wheatgrass, Idaho Fescue and stiff sage; used mainly as rangeland. 2) = 32E - *Kalema very stony silt loam*, moderately deep, well drained, mainly coniferous forest and an understory of shrubs, forbs and grasses; used mainly for timber production, also used for woodland grazing and wildlife habitat. 3) = 33E - *Klicker stony silt loam*, moderately deep, well drained, mountainous uplands, vegetation is mainly coniferous forest with bunchgrasses annual forbs and perennial shrubs, unit is used mainly for timber production, also for woodland grazing and wildlife habitat. 4) = 61E - *Ukiah-Starkey complex*, Ukiah moderately deep and well drained, vegetation mainly Idaho Fescue, Blue-bunch wheatgrass and Sandberg bluegrass; used mainly as rangeland. Collectively, the soils makeup for Route 3, tend to be deeper, loamier, of residual decomposed basalt, but with more volcanic ash composition. The site index for timber production is higher, where shrub composition is greater. **Morgan Lake Route 3 crosses 66 % forested acres mostly cool moist plant communities, and that is 33% more timber acres than does the Agency Selected Route A crosses.**

Recreation - OAR 345-022-0100
Protected Areas - OAR 345-022-0040
Scenic Resources – OAR 345-022-0080.

Morgan Lake Route 3 also establishes towers within 500 feet of Morgan Lake Park. Here, the impact on La Grande's public will be *High*. The first stated goal in the Morgan Lake Park Recreational Use and Development Plan (Section 1, Page 2) - *A goal of minimum development of Morgan Lake Park should be maintained to preserve the maximum of natural setting and to encourage solitude, isolation, and limited visibility of users while at the same time providing safe and sanitary condition for users.* Also noteworthy is the fact that the **City of La Grande Chamber of Commerce** has long promoted Morgan Lake Park as the #1 Recreation Tourist Destination in the La Grande Area. And the State of Oregon designated **Morgan Lake Park as a State Wildlife Refuge** in the 1960s. Today Oregon Department of Fish and Wildlife identifies the Lake as an easy access fishing destination for the handicapped.

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

Fish and Wildlife Habitat - OAR 345-022-0060,

Morgan Lake Route 3 crosses Rock Creek approximately 2.5 miles upstream from the Grande Ronde River - just below where Sheep Creek flows into Rock Creek. Here is where the best water quality and the coolest water temperatures exist during the heat of summer. And here is where Route 3 will cross. Rock Creek is not a Chinook Salmon spawning habitat. However, **the lower six miles of Rock Creek have been identified as important habitat for both Steelhead and Chinook Salmon smolts.**

Twin Lake, at 4,100 feet elevation, supports one of the most diverse waterfowl nesting communities in the Blue Mountain Ecoregion. Most unusual is the nesting by: Ring-necked Ducks, Red Head, Rudy Duck, Blue-winged Teal, Shoveler, and Pied-billed Grebe. The species diversity surrounding this wetlands anomaly at 4100 feet elevation, is enhanced by the natural basalt rim rocks forming the south and west sides of the lake. Here the vegetation is a diverse mixture of native shrubs, aspen, black Cottonwood, and Ponderosa pine. These surrounding shrub and tree communities support as rich an assortment of both migratory and nesting passerine birds as can be recognized across the Blue Mountain Ecoregion. **Also frequenting these habitats are two bird species identified on the Oregon Department of Fish and Wildlife – Sensitive Species List: Great Gray Owl, and White-headed Woodpecker.**

In 2013 a Pair of Bald Eagles constructed a nest in the top of a large Ponderosa pine at the west edge of Twin Lake where they fledged their first two young. GPS coordinates (Degrees, Minutes,

Seconds) for Nest-1 are: N 45°, 18', 06.0" by W118°, 08', 44.2". Route 3 places a Tower 580 feet from Nest 1. The pair of Eagles has since built Nest-2 at N 45°, 17', 45.9" by W118°, 08', 54.4". Route 3 places a Tower 0.31 miles east of Nest 2. Route 3 places the transmission line between the two nests. Here I will point out that IPC's Avoidance Criterion Identifies Bald Eagle Nests as High Avoidance – recognizing a Buffer of one mile. The Morgan Lake Route 3 demonstrates a disregard for these Bald Eagles. Here at the ridge-top, Morgan Lake supports an entire ecosystem of scale where the fall hawk migration follows south up the monocline ridge. Here, watching Bald Eagles and their interaction with fishing Ospreys is a popular nature spectacle. If the Morgan Lake Route 3 is built, the spectacle will become a loud "crackling" transmission line towering over Morgan Lake Park.

South of Morgan Lake, Route 3 advances southeast up the Glass Hill Monocline and into renowned high-density elk breeding grounds. Here in the upper reaches of Sheep Creek are numerous sedge meadow springs that are used heavily as elk wallows. All "muddied-up", large mature bulls now strut out onto the open bunchgrass slopes to breed on Cowboy and Sheep Ridges. Landowners here have a long history of promoting the Elk Resource as a viable economic and recreational endeavor. Oregon's Governor Pierce and Supreme Court Justice William O. Douglas once made this habitat their personal "getaway." One neighbor has made land acquisitions and established conservation easements to consolidate and preserve the native integrity of the area. The Rocky Mountain Elk Foundation is a cooperator in these efforts, as is the case with the Eastern Oregon University's Rebarrow Forest Project. Before the white-man's time, the Glass Hill Monocline was the gathering location for hundreds of horses that were summer pastured on what we now call the Starkey Range Lands. This is sacred ground, that has been long recognized for its richness and integrity of native vegetation.

Threatened and Endangered Species – OAR 345-022-0060

Morgan Lake Route 3 could impact Snake River Chinook Salmon habitat and water quality where the route crosses Rock Creek.

Oregon's Sensitive Species Rule – OAR 635-100-0040

Morgan Lake Route 3 will affect known Great Gray Owl and White-headed Woodpecker habitats across the 2.5 mile stretch between Rock Creek and Morgan Lake.

Health and Safety Standards for Siting Transmission Lines - OAR 345-024-0090

Specific Standards for Facilities Related to Underground Gas Storage Reservoirs - OAR 345-024-0030

At this point we need to consider the Transmission-line Tower that would stand closest to Morgan Lake recreationists. It is located within 100 feet of a thirty-inch diameter Natural Gas Line (Trans-Alaska, 1st leg constructed 1982). Here the gas-line is less than 600 feet from Morgan Lake Park. And here at the ridge-top is a known zone of weakness for said pipeline. From the top of the Glass Hill Monocline, the pipeline drops steep downslope in both directions – east and west. Over the years, there have been multiple pipeline ruptures less than a mile from Morgan Lake. This explosive potential exposes the residence of Morgan Lake Estates and the recreationist at Morgan Lake Park to unnecessary risk. IPC also needs to consider how their stray energy electrolysis will erode this Trans-Alaska Natural Gas Pipeline. The Morgan Lake Route 3 crosses the natural gas line twice - once at Morgan Lake, and again it crosses at Rock Creek – approximately 2.5 miles to the northwest. Even more noteworthy, is the fact that the Agency Selected Route A avoids pipeline crossing all together.

Looking at the statistics for American transmission lines, I see that between 1984 and 2006, approximately 44% of all power blackouts were weather-related, and of those – 11% were caused by lightning activity. As a resident of the Morgan Lake Estates, I am extremely concerned that IPC's transmission line may act as a source of ignition for leaking gas from an aging pipeline, as well as for uncontrolled wildfire - we have recently seen this in California. My residential property is within 100 feet of the pipeline, and within 900 feet of the Morgan Lake transmission-line/powerline crossing. In 2005, Union County conducted a County-wide Wildland Urban Interface Fire Hazard Analysis. The resulting Analysis was published using Federal grant monies. The document identifies fourteen different Wildland Urban Interface (WUI) Zones within Union County. Based upon a set of Risk Analysis Criterion, each of the 14 WUI Areas were ranked from High-1 to Low-14. The Morgan Lake Estates WUI was given the Highest (#1) Ranking. It is also noteworthy that along the Agency Identified Route A, there are no residences in any direction for well over a mile.

Of the three routes under consideration, the Morgan Lake Route 3 gets the Highest Fire Risk Rating for the following reasons: it follows across the top of the Glasshill Monocline adjacent to the Grande Ronde Valley. The construction of a 200-foot-tall transmission line towers, along the highest ridgetop, where they are exposed to the most turbulent weather conditions is a recipe for fire. Here at this high elevation, the Morgan Lake Route 3 will be cut through *Cold Moist Ecotypes* that are dominated by mixed-conifer forests. Here, dense volatile fuels are exposed, where winds are the norm, and fuels dry quickly. It is highly significant that this area of the Blue Mountains is in the major lightning path, where cumulus buildups move up from the southwest. The storms track across the Blue Mountains strengthening as they move northeasterly. And as the storms cross the Glass Hill Monocline and the adjacent Grande Ronde Valley, thermals increase lightning activity at the ridgetop – not a good place for a major transmission line. Note here that the Agency Selected Route A rapidly drops (west) down from the Glass Hill Monocline and onto a lowland ridge where winds and weather are diminished, and where vegetative fuel is sparse short grass vegetation of low flammability.

As a resident in the Morgan Lake Estates for 40 years, I have always considered Morgan Lake to be our greatest *Fire Fighting Asset*. At the ridgetop, Morgan Lake provides fire helicopters with buckets the ability to come and go from any direction without limitations. Morgan Lake is among the best water sources for helicopters in the region. The proposed Morgan Lake Route 3 would significantly change helicopter activity around Morgan Lake, creating an unnecessary liability that puts us all at risk.

Additionally, the Morgan Lake Route 3 (at the ridgetop) poses additional aviation liabilities that need consideration. Most air traffic in and out of La Grande Airport, the U.S. Forest Service Airtanker Base, and the Life Flight Base comes from and goes out to the west. Low Flying aircraft cross the Morgan Lake ridgetop commonly. Again, the Morgan Lake Route B creates unnecessary liabilities that puts us all at risk. The Agency Identified Route A eliminates these liabilities.

SUMMARY

Idaho Power's Proposed Routes offer Oregon decision makers a false choice. It is likely that Idaho Power's Proposed Route B will not achieve License Approval by EFSC. By default, IPC's request would become permit Morgan Lake Route 3. IPC put these two routes forward in the "11th hour" of the Final EIS. Neither route was evaluated by a credible environmental review team. I have dedicated my own time to comparing and contrasting Morgan Lake Route 3 with the Agency Identified Route A

because Oregon's decision makers and the public deserve a full vetted and evaluated alternative. The **Morgan Lake Route 3 is High Impact.**

At the ridgetop, the Morgan Lake Route 3 would have greater impacts on: protected areas, recreation, scenic resources, soils, forested acres, and fish and wildlife habitats. The Morgan Lake Route poses unnecessary risks to: public health and safety, the wildland urban interface, fire suppression support systems, and to aircraft transportation. Morgan Lake Route is more topographically complex, has very limited road access, and requires much more disruption to wildlands. **All said, I calculate that the Morgan Lake Route 3 is a significantly more expensive transmission line segment to build, and to maintain.**

Alternatively, the Agency Identified Route A is topographically simple, has extensive solid road access, and crosses uninhabited lowlands. Here, soils are thin, vegetation is sparse and of low flammability. **It is clear to me why Route A is the Agency Identified Route. And it remains a complete mystery - why IPC chooses to disregard the Agency Identified Route.**

Idaho Power has been asked repeatedly – why the **Agency Identified Route 3** was not included in the EFSC Application? On October 17, 2018, IPC and EFSC held a joint informational meeting at the Blue Mountain Conference Center in La Grande. A member of the audience asked IPC's Jim Maffuccio the question – **why are you not using the BLM's environmentally preferred route?** His vague answer was essentially - **we have been working with landowners; there are habitat concerns; the tribes have some concerns; we are communicating with the BLM.** There has been no further elaboration or publicly presented documentation.

I am now asking EFSC, to ask Idaho Power Corporation, to amend their Oregon Application for Site Certificate - Include the Agency Identified Route A for consideration.

Going forward, I also ask that EFSC consider seriously the issues of Health and Public Safety. And I ask that EFSC members consider the **Oregon Conservation Strategy (OCS)** as they weigh the impacts that each of the three routes: A, B, & 3. OCS is the state's overarching strategy for conserving fish and wildlife resources. It serves as the official State Wildlife Action Plan for Oregon, and it is a requirement for the federal State Wildlife Grant Program. The objective of OCS is to conserve fish and wildlife resources by maintaining and restoring *functioning habitats*. OCS breaks the state into *Ecoregions* - the entirety of Union County is within the *Blue Mountains Ecoregion*. It is critical that EFSC members understand that the setting for this transmission Line analysis is arguably in one of the Highest Functioning Habitat Areas in the Blue Mountains Ecoregion. The variability of topography, elevation, soils, native vegetation, and wildlife habitats along the breaks of the Grande Ronde Valley is very high, especially for a two-mile radius surrounding Morgan and Twin Lakes...

Respectfully 

Michael McAllister (Owner), Wildland Resource Enterprises, 60069 Morgan Lake Road, La Grande, OR, 97850, wildlandmm@netscape.net, (541) 786-1507 .

cc. EFSC Facility Siting team – energy.siting@oregon.gov, Mark Stocks – Applicant/Certificate holder – mstokes@idahopower.com, Scott Hartell – Planning Director for Union County - shartell@union-county.org , Don Gonzale – BLM B2H NEPA Coordinator – dgonzale@blm.gov .



Oregon Department of Energy and the Energy Facility Siting Council

RECEIVED

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

JUL 24 2019

DEPARTMENT OF ENERGY

Name (mandatory) Connie McCall
Mailing Address (mandatory) 64565 Bear Creek Road
Pilot Rock, Oregon 97868
Phone Number (optional) (541) 443-6482 Email Address (optional) _____

Today's Date: 7-16-19

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.)

I've been told that my opinion won't matter,
but want you to know that I hate this ugly
(so intrusive) line will pass through my
property and cross over Bear Creek almost
in my front yard. There are 4 homes (all
family) here together and all of us will be
able to see and hear this monstrosity from

(additional space for written comments)

our homes. It's already obsolete, why would you continue on this course.

There are better and cheaper ways to access power. We consumers will be paying for this line forever.

Why would you want to ugly up Oregon's scenic property and our front yards. I've lived here almost 70 years... I'm third generation, and you want to cut our ranch in half by the transmission line. There will be almost no place on our 10,000+ acres that this line won't be visible - scarring our ranch with ugly. There is much history on this ranch. The last Indian/Calvary battle was fought on our ranch and the transmission line will pass nearby. Why would you destroy this historic site scenery? Why can't we tell you "No"? We've been caring for this property, and paying the taxes, on it all

TARDAEWETHER Kellen * ODOE

From: Dorene McCarthy <mtemily@eoni.com>
Sent: Monday, August 12, 2019 11:46 PM
To: B2H DPOComments * ODOE
Subject: B2H

Hello, My husband and I live in the Grande Ronde Valley of North Eastern Oregon, La Grande to be exact. We attended the meeting this summer in LaGrande and listened to the variety of speakers. We also agree with the hope to stop the line from coming through our area. Morgan lake is a beautiful place. It is unusual to have such a wild place with a lake so close to town. Many people enjoy it for its place in nature that is easily accessible.

I think the idea of a transmission line as it is designed is antiquated. Energy could be utilized closer to its need, wind, solar...We strongly feel that there will be negative consequences.

Some of which are:

1. Devastation to the view and to peoples need for respite and relaxation in a natural environment. Just the thought of it, raises my blood pressure! We love our Morgan Lake.
- 2.. Increase risk of fire danger, remember Paradise, California? We have a lot of lightening strikes here besides. A fire in that area, with winds which are common, would wipe out our town. History had one such close incident. Our fire department is small. This is a risk to lives that should not be taken.
3. The huge swath of clear cut is unfathomable and then it will need to be maintained with chemicals to keep the brush and grasses down, another insult to our wild area. Wildlife, people, plants, soil organisms will all feel the affects for countless years. Many human ideas are problematic for our earth and nature's way! Mistakes are felt for generations, while a few get financial gain at the expense of others.
4. The road leading up to Morgan Lake cannot withstand that kind of traffic. It is steep, windey and precarious. I cannot even imagine the damage to the road and to the residents lifestyle they chose in being in that area.
5. The land is not stable enough to support such massive structures. A scientist spoke about this aspect at the meeting.
6. Radiation from the lines add to an unhealthy environment
7. We, the residents of Union County will not have any benefit from this line, only risk and negative aspects.

8. More study is needed to assess the damage, the risks and perils that could be caused by this line so close to our town.

WE ARE STRONGLY OPPOSED! Thank you for considering our interests in choosing how your line will affect the people and the beautiful area we live in.

Dorene and Timothy McCarthy
63172 Starr Lane
La Grande, Oregon 97850
mfamily@eoni.com
541-786-6015

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 6-20-19 Location: La Grande
REGISTRATION FOR PUBLIC COMMENT

Name: Sue McCarthy

Address: 60760 Wood Rd La Grande OR

I represent (if applicable) same as above
Print your name OR your organization/business name.

Send me future notifications about Council meetings via email.

My email address is: Suemc@EONF.com

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

I wish to submit the following written comment:

Our property borders Morgan Lake Park. Previously I wrote a letter stating the location of a bald eagle nest with coordinates @ Morgan Lake. We also have documented photos of the pair of adult eagles that have used this nest. Morgan Lake is literally our back yard. One reason we moved to La Grande was Morgan Lake Park. We have
PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.
lived next to the Park since 1987,

10 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:

This letter is referring to the Content of Application for the Boardman to Hemingway Exhibit X-Noise.

A. The area where noise has been studied and identified is one half mile from site. This is a large area when homes and the Morgan Lake Wildlife area are taken into consideration.

B. The term Foul Weather lacks a proper definition. Only four sites collected data for possible foul weather from the complete proposed line. The "La Grande" collection station is not enough for analysis of the entire area. What about all of Blue Mountain?

C. Sound levels were analyzed March 6, 2017 to May 10 2017 and March 11 2017 to June 12 2017. This time span is about a fourth of the year. There is no data on the remaining nine months.

D. Why did the ODEQ exempt Idaho Power from standards and regulations OAR 340-0035? The council granted this because as stated "the ODEQ Noise Rules in place would most likely make the project unpermissible". Is this not why there are rules to prevent what Idaho Power is attempting to accomplish?

Thank you,

Sue McCarthy

Sue McCarthy
60760 Wood Rd
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:

Address

M Sue McCarthy
60760 Wood Rd
La Grande, OR 97850-1380

TARDAEWETHER Kellen * ODOE

From: Marshall McComb <marshall.mccomb@gmail.com>
Sent: Friday, August 16, 2019 9:33 AM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project

August 15, 2019

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

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:

The proposed Boardman to Hemingway transmission line will desecrate the iconic path of the greatest migration in U.S. history in picturesque Baker Valley. Please either approve a buried line or another route to bypass the Oregon National Historic Trail and the Oregon Trail Interpretive Center – or deny the Site Certificate completely.

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

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

The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power (IPC) has from the beginning 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 incorrectly 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 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:

- 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.

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.

Please prevent the unconscionable desecration of this national treasure.

Sincerely,

Marshall McComb

1641 Washington Avenue
Baker City, OR 97814
marshall.mccomb@gmail.com
541-523-9215

TARDAEWETHER Kellen * ODOE

From: Marshall McComb <marshall.mccomb@gmail.com>
Sent: Monday, August 19, 2019 9:49 AM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project

August 16, 2019

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

B2H.DPOComments@Oregon.gov

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:

The Boardman to Hemingway Transmission Project (B2H), as proposed, poses a danger to the citizens of La Grande because of slope instability.

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

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

5.2 La Grande Area Slope Instability

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

This slope instability is not inconsequential to a project like this. Recall in 2014, **Oso, Washington**, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities.

We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed

B2H line includes 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 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. 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,

Marshall McComb
1641 Washington Avenue
Baker City, OR 97814
marshall.mccomb@gmail.com
541-523-9215

TARDAEWETHER Kellen * ODOE

From: Marshall McComb <marshall.mccomb@gmail.com>
Sent: Monday, August 19, 2019 10:26 AM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project

August 19, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

The Boardman to Hemingway Transmission Project (B2H), as proposed, poses a danger to the citizens of our community from wildfire.

Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis.

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 defects.

This history is relevant, because, for example, the Boardman to Hemingway Transmission Line Project proposal places power lines about 2,000 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 the hospital in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of our community.

The Council should deny the request for a site certificate.

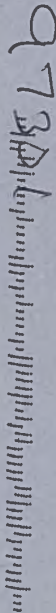
Sincerely,

Marshall McComb
1641 Washington Avenue
Baker City, OR 97814
marshall.mccomb@gmail.com
541-523-9215

1112 1/2 Adams Ave
La Grande, OR 97850

Energy Facility Siting Counsel
Attn: V. Tardewat
Oregon Dept. of Energy
550 Capitol St., NE
Salem OR

97301-374299



POSTAGE WILL BE PAID BY ADDRESSEE
17 AUG 2019 PM 4 L



RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

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

B2H EFSC BURROWING OWL SURVEYS NEEDED

OAR 345-022-0060 is intended to assess the impact of the development on habitat for species utilizing it. A survey for burrowing owls should be included in the application as there is proper habitat. This survey needs to extend beyond the site boundaries to identify where indirect impacts may occur. Without that survey, there will be no baseline for impact assessment in order to determine how significant the impacts may be and determine if they preclude the issuance of a site certificate. In addition, identification of habitat classifications cannot be determined due to the impact that species using the habitat have on the category assigned. During the habitat surveys for Antelope Ridge Wind Development, two active burrowing owl nests were identified in the area that the proposed B2H transmission line will cross and reported by ODFW in their comments. These nests are located on Category 1 habitat as well as any additional nest sites, but the developer does not plan to establish impacts to burrowing owl nest habitat. This fails to comply with OAR 345-022-0060. A site certificate cannot be issued absent information regarding the current habitat impacts of the development on Burrowing Owls.

Ref: February 25, 2011 letter from Jim Cadwell to Colleen Fagan



Signature/Name Karen McConnell

Address: 10102 Emily Drive
La Grande, OR 97850

August 12, 2019

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

Mary McCracken
Signature

8/13/19

Name: Mary McCracken
Address: 63036 Buchanan Ln
La Grande, OR 97050

As one of the hundreds to show up for B2H public hearings, I have numerous concerns about the proposed line—regardless of route.

As a La Grande resident, Morgan Lake has long been a convenient get away. I walk + cross country ski in Morgan Lake Park property.

From the documentation cited in this letter I'd say you have no idea of ~~the~~ value this park has to both residents + wildlife. Even pelicans have been known to stop over there. Please "do no harm" to Morgan Lake Park.

Mary McCracken

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.

Mary McGracken
Signature
63836 Buchanan Ln
Mailing Address: 97850

Mary McGracken
Printed Name

8/13/19
Forestry has been decided around here for some time. Taking this swath thro timberland will take many acres out of production & have negative impacts well beyond the

the corr'do ~~is~~ Not good for OR economy.

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. *As I've done 3 times!*

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!**

Mary McCracken
Signature
Printed name: Mary McCracken
Mailing address: 63036 Buchananha
LaGrande OR 97850
Email address: mcmcc@eon1.com
phone number: (optional)

La Grande & Baker treasure our connection to the Oregon Trail. I've taken many of state family members friends to Baker's Overlook facility. The sight of your transmission lines & towers would do great harm & change the experience. Stay out of sight! Mary

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,

Mary McCracken
Signature

Printed Name: Mary McCracken
Mailing Address: 63036 Buchanan Ln
LaGrande, OR
97030

8/13/19

I have not personally done the work cited above. I do own a small cabin near the proposed routes and the quiet nature of the place has great value to me. Traffic along Glouster Hill road would impact me not only sound, but dust + visual influences. I would

Want you to attend to the issues brought up
in the "x" paragraph.

My belief is that energy sources &
distribution will be changing radically
in the coming decade. Don't invest in
buggies & horses once you've seen ~~at~~
a Model T.

Mary

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.

8/13/19

Sincerely,

Mary McCracken

Name: Mary McCracken

Address: 63036 Buchanan Ln
La Grande, OR 97850

* My cabin is located at the mouth of a small spring which is fenced off from even cattle + elk. If the spring goes dry my land will have very little value since the spring fills a pond for animals to drink from. water is life.

I own a tiny remote cabin along Glass Hill Road near the various proposed B2H routes. Fire, unlike sound, dust, vision, has no boundary. Much of the vegetation about La Grande is now annual grasses due to over grazing. These are highly combustible! A huge CA fire was caused by a spark from a farmer driving a metal post. He was unaware of it until it was too late to stop. ~~That~~ The tiniest spark along the ridge about La Grande could explode across N.E. Oregon! CA wildfires have been attributed to powerlines. It would be foolish to risk the consequences of starting a major fire. Your ass would be burned + get scorched too. Mary

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 1/2 mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

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

Sincerely,

8/13/19

Mary McCracken
Signature

Printed Name:
Mary McCracken
Mailing Address:

63036 Buchanan Ln
La Grande, OR 97850

Being an average person with a full life + minimal skills in researching such a huge project - I'm signing onto this well documented letter.

My additional comments are just that the entire nature of the Morgan Lake ^{would} ~~is~~

Glass Hill area just outside of La Grande ~~is~~ be completely ruined both during construction & operation. Folks in La Grande are so fortunate to have the peaceful area above town for walk biking + riding horses. Its removed from sound other than those of nature + quite undisturbed. B2H would bring disturbing sounds all along the corridor. Shame on you! Mary

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, *Mary McCracken*

Name: *Mary McCracken*
Address: *63036 Buchanan Ln*
La Grande, OR. 97850

8/13/19

I am fairly familiar with avalanches + know there are tests for snow conditions + sites to advise skiers + snowmobilers as to risks. For recreationalists ~~the~~ risk level assessment + consequential action is personal. Rarely do we endanger others.

However, a project such as B2H, could ~~cause~~ have major significant impacts on large numbers of people + structures as pointed out in the well documented letter.

Please take heed.

Mary

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

REMAINING THREE TOED WOODPECKER AND GOSHAWK SURVEYS NEEDED –
BOARDMAN TO HEMINGWAY TRANSMISSION PROJECT

The developer has failed to complete surveying the proposed site for the presence of American Three Toed Woodpecker, and they do not plan to complete the survey work which has started. See Exhibit P1, PAGE PI-9.

These surveys need to be included in the site certificate application.

Three toed woodpecker species are listed as at risk of becoming extinct. The developer has not surveyed the entire length of the proposed transmission line and they are proposing no further surveys. This means that the Oregon Department of Energy is unable to determine that the developer will be in compliance with the Threatened and Endangered Species rules contained in OAR 345-022-0070 or the Habitat Mitigation rules in OAR 345-022-0060. The entire siting corridor needs to be surveyed prior to the start of construction and all accessible areas should have been provided as a part of the application. There remain 287 calling stations which need to be surveyed prior to making a determination regarding the impacts to Northern Goshawk and American Three-toed Woodpeckers.

The only way that EFSC and ODOE can be deemed to be in compliance with the federal Threatened and Endangered Species act is through a valid and complete assessment and mitigation for habitat impacts to threatened and endangered species. The current application and failure to require the completion of surveys for all remaining areas will place the Oregon Department of Energy and Energy Facility Siting Council in the position of being liable for any damages sustained by these rare and endangered species.

Signature/Name *Mary McCracken*
Mary McCracken
Address: *63036 Buchanan Ln*
La Grande, OR 97050

I purchased land on Glass Hill to provide habitat for forest wildlife + manage it accordingly. I expect you to be in compliance w/ federal Threatened + Endangered Species act!
Mary McCracken

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

INTERFERENCE WITH RADIO SIGNALS

High voltage transmission lines interfere with radio and television signals. This can be not only an inconvenience, but a safety and health issue. Agricultural workers often work alone and in areas not observable by others. They rely upon cell phones and other devices to obtain help in the event of an accident. In addition, modern farm equipment is often radio controlled. A 500 kV transmission line will interfere with the functioning of radio controlled equipment. These impacts will severely impact farm production and the cost of production due to requiring additional employees to perform functions that occur automatically when the equipment is working.

The site certificate needs to clearly identify the developer as having responsibility to take necessary action to resolve any interference with radio signals which impact farming operations. Failure to require such action needs to result in the inclusion of the increased costs in the cumulative impacts that will show a significant increase in the costs of farming operations due to the transmission line.

Recommended Site Condition:

The developer will provide contact information for citizens to report suspected transmission line interference with radio, phone or equipment signals. Complaints will be followed up on within 30 days. The developer will take necessary action to remove the interference with radio signals relied upon by individuals engaged in farming operations.

*I am often hiking alone in the
Hass Hill area and rely on my phone
for emergency contact.*

*Mary McCracken
Mary McCracken
63036 Buchanan Lk
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

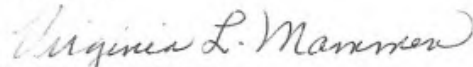
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

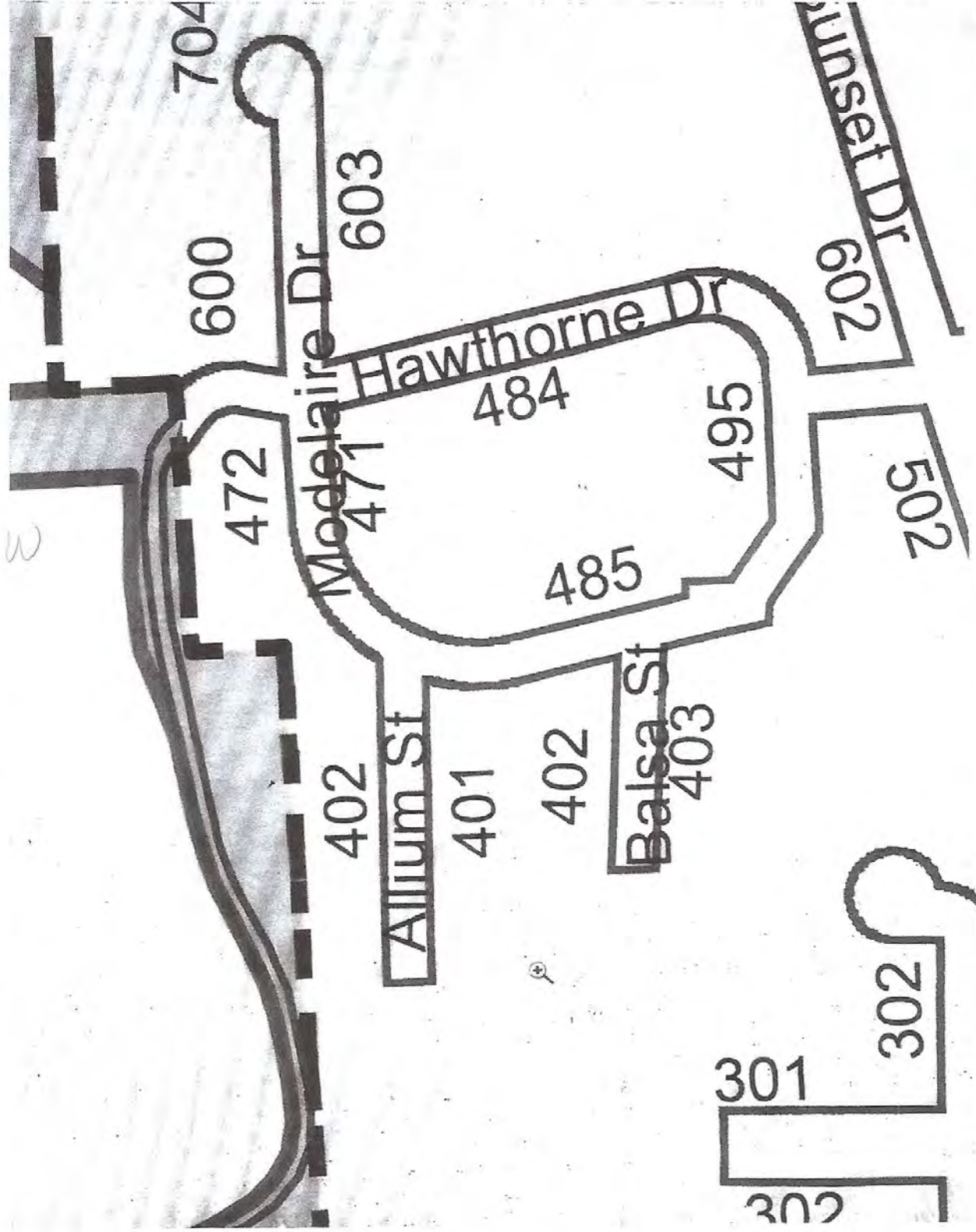


Exhibit 3

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

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



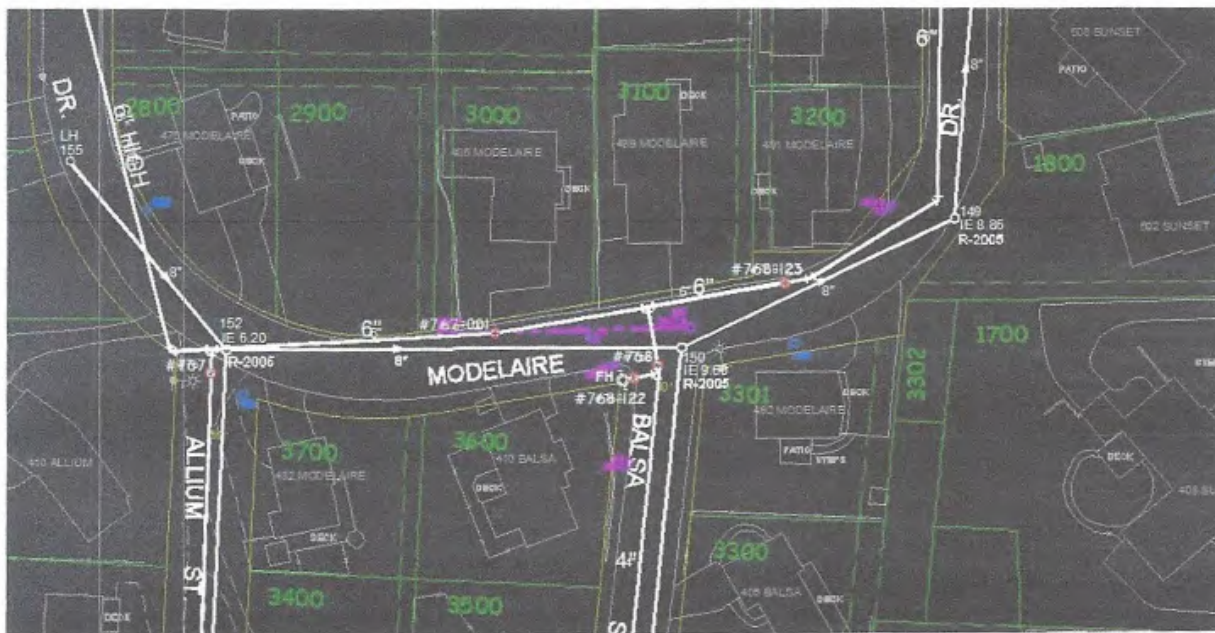
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

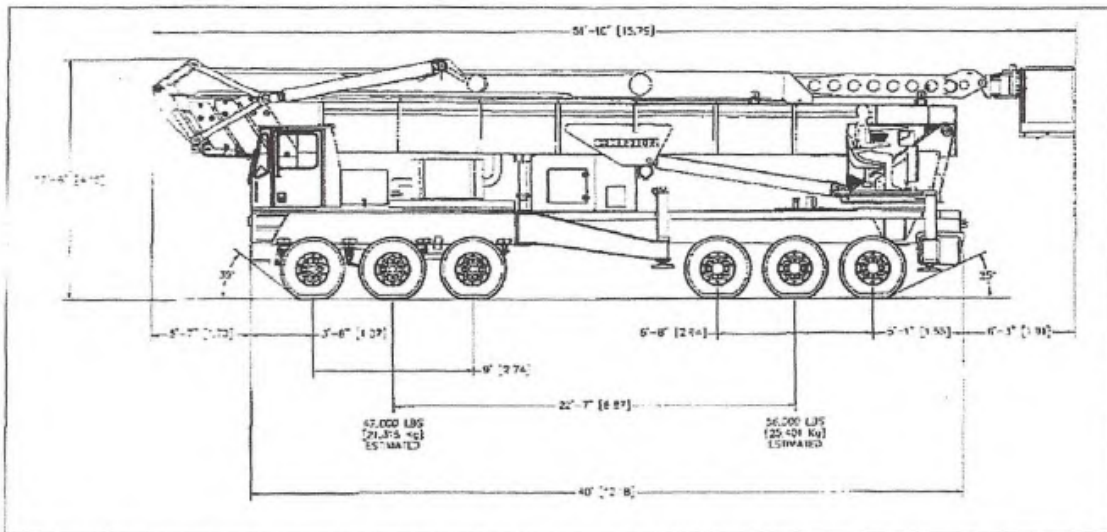


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

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

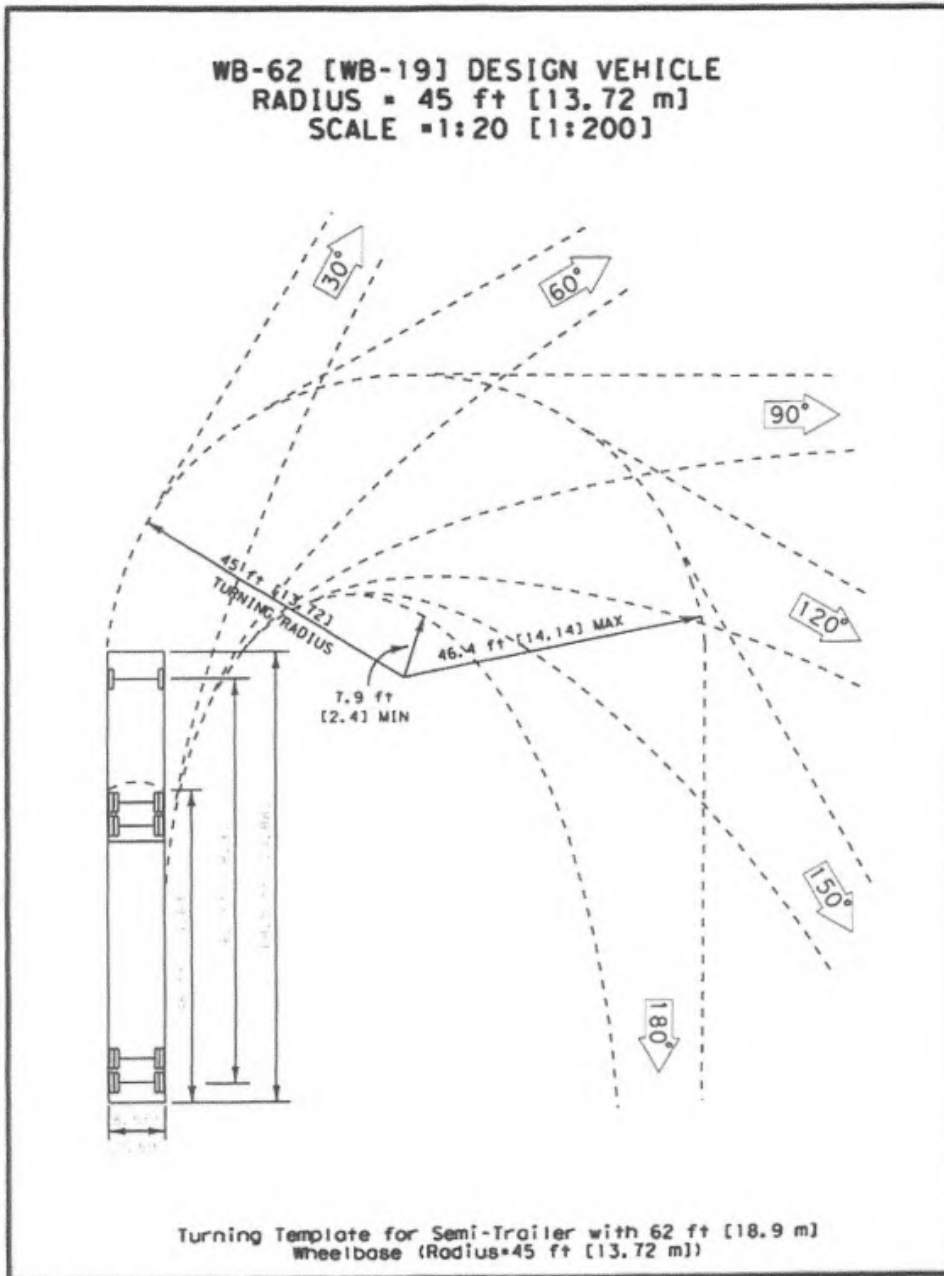


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

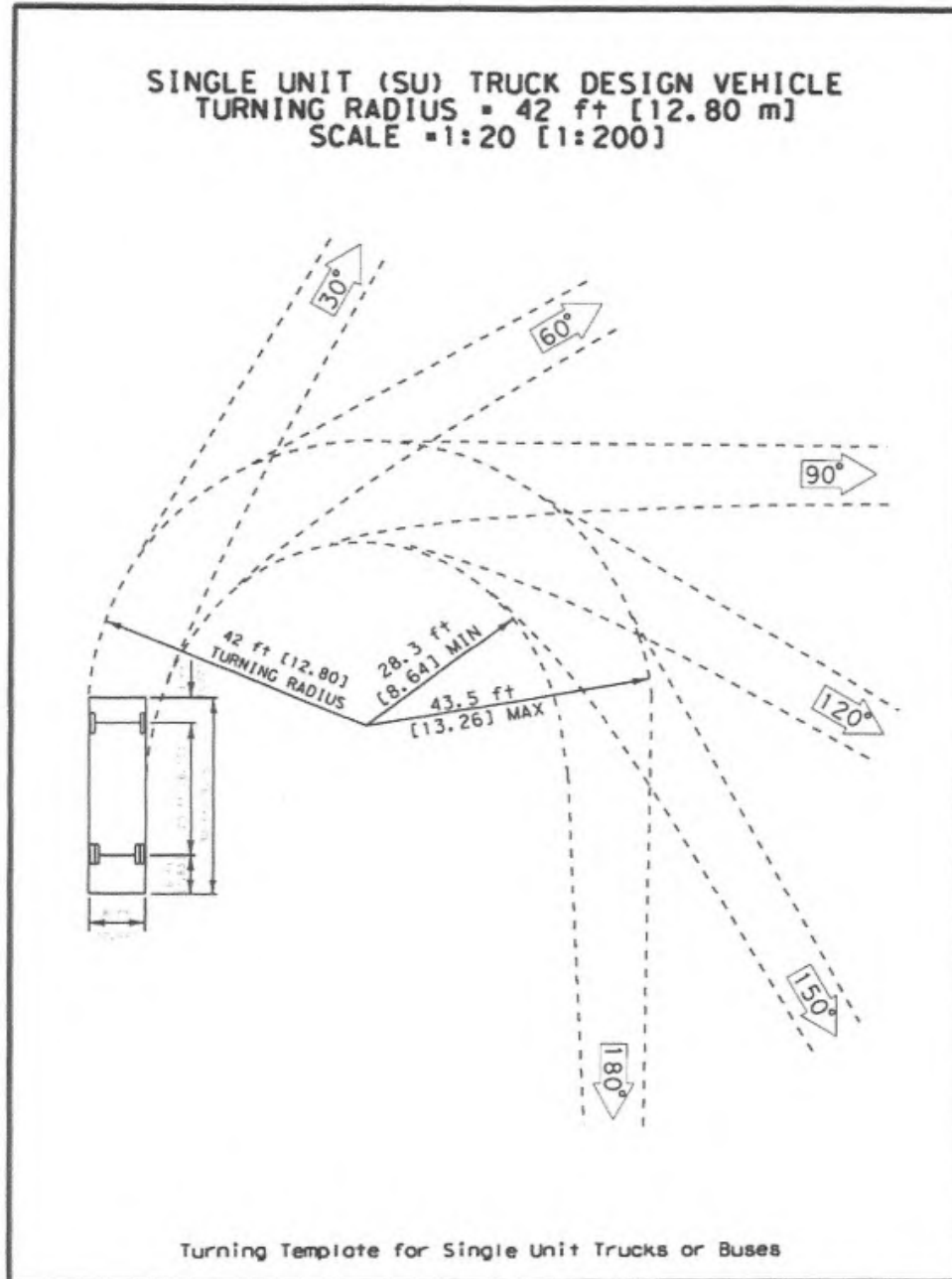


Exhibit 15

**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.

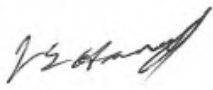
Section 17. TRUCK ROUTES

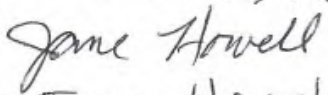
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

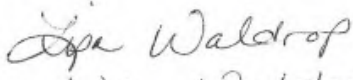
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

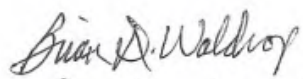
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

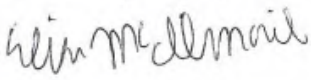
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SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

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 MODELAIRE DR.
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

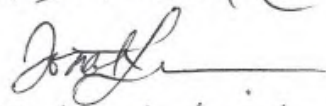

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL


Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner
Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

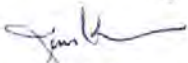
ADDRESS


EMAIL

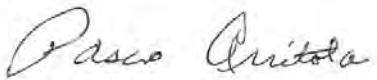
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

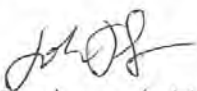
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@comi.com


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

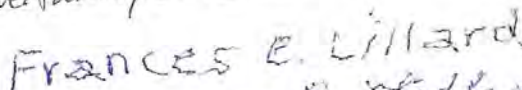
SIGNATURE 
PRINTED NAME Judie Arritola
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EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL PSTOLA@CHARTER.NET


SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

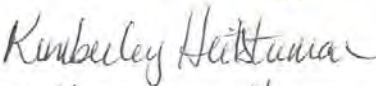
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


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

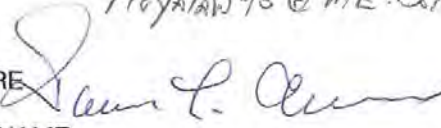
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

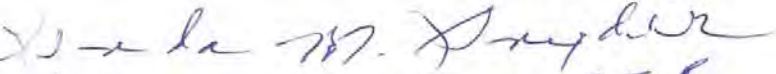
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

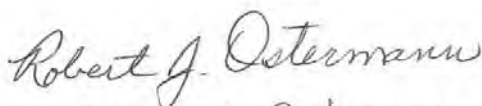
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL HoyalaW95@ME.com


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

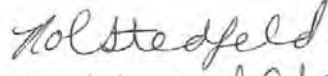
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

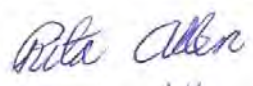
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

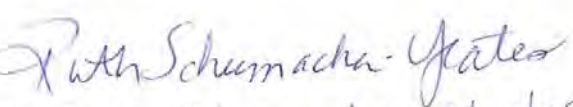
SIGNATURE 
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ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

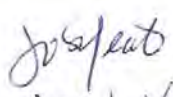
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SIGNATURE 
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SIGNATURE 
PRINTED NAME Robin Stedfeld
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EMAIL rstedfeld@yahoo.com

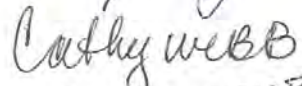
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

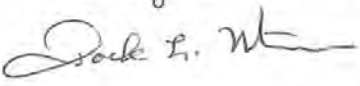
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
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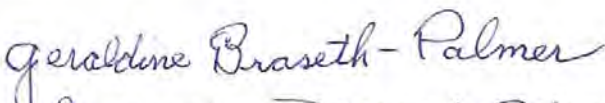

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com


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

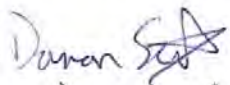
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


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

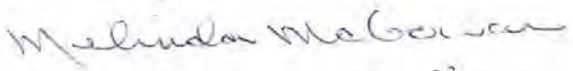
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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SIGNATURE 
PRINTED NAME Jean BAPH
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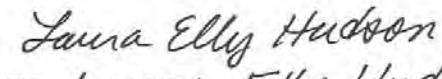
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SIGNATURE 
PRINTED NAME Damon Sexton
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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EMAIL 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
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SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
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EMAIL acavinat@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, LaGrande, Or. 97850
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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SIGNATURE *Bert R. Freewing*
PRINTED NAME Bert R. Freewing
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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
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SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
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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
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EMAIL carolsummers1935@gmail.com

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

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

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

July 27, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

Soils; Map page 18 of 44:

* Table B3: Soil Descriptions, described as:
5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36
95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing
95/4 - Angle change along alignment; Road and railroad crossing

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

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

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

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

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

The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled 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: *63316 Gekeker 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.

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

August 5, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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

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

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

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

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

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

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

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

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

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

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

Sincerely,

Nan L. McDaniel

Name: Nan McDaniel

Address: 63316 Gekeler Lane
LaGrande, OR

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

N. McDaniel

RECEIVED

AUG 22 2019

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

Dear Chair Beyeler and Members of the Council:

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

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

Richard L. McDaniel
63316 Gehlen Lane
Dalstrand, OR 97850

1112 1/2 Adams Ave
La Grande, OR 97850

Energy Facility Siting Counsel
Attn: Tardeweth
Oregon Dept. of Energy
550 Capital St., NE
Salem OR

97301-374299

97301-374299

POSTAGE WILL BE PAID BY ADDRESSEE
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AUG 19 2019

DEPARTMENT OF ENERGY

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

Kathleen A McGee

Name: Kathleen McGee

Address: 80 Oak St
La Grande OR
97850

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" 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

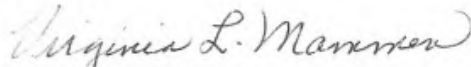
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

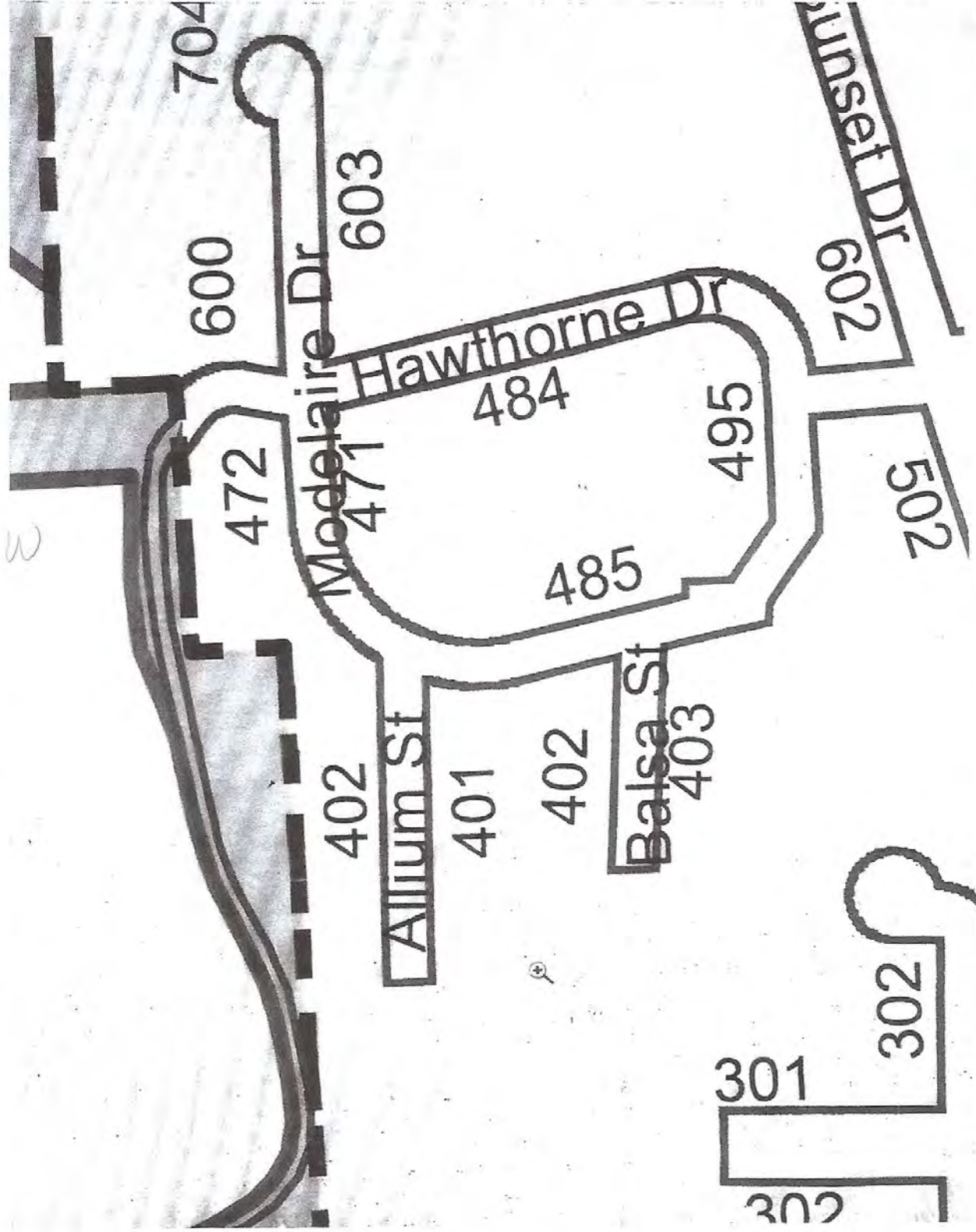


Exhibit 3

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



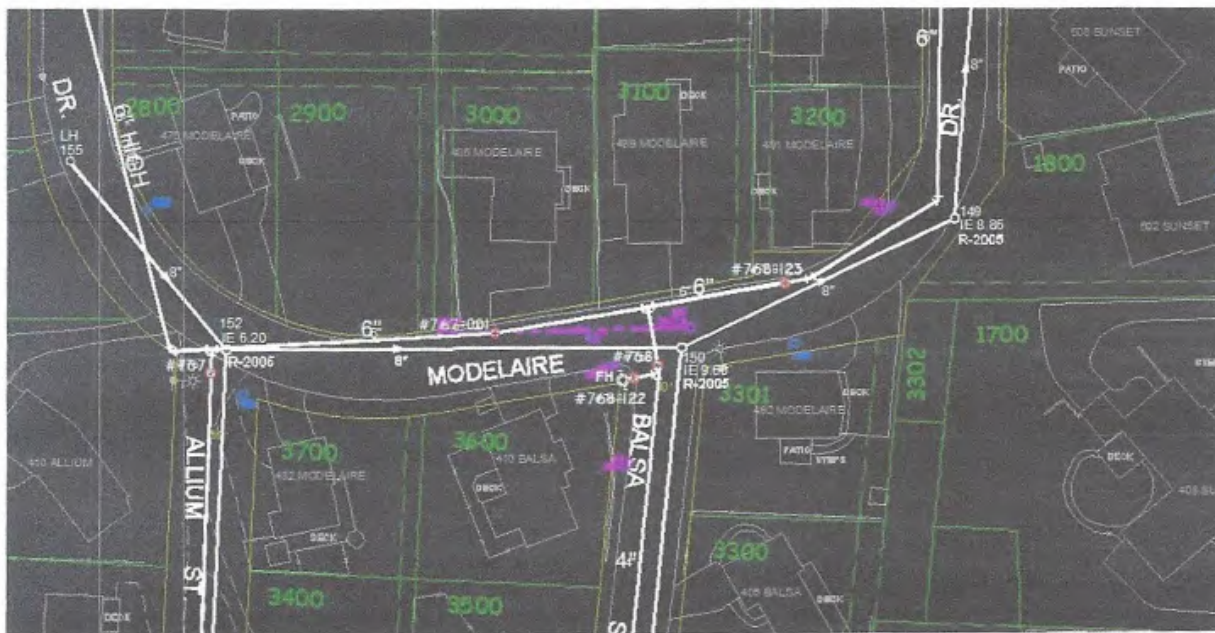
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

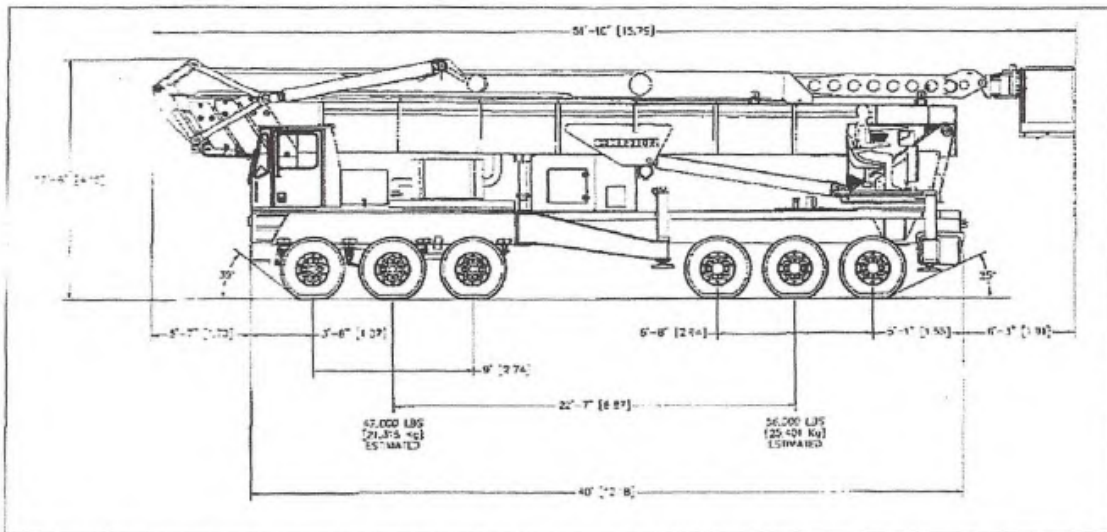


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

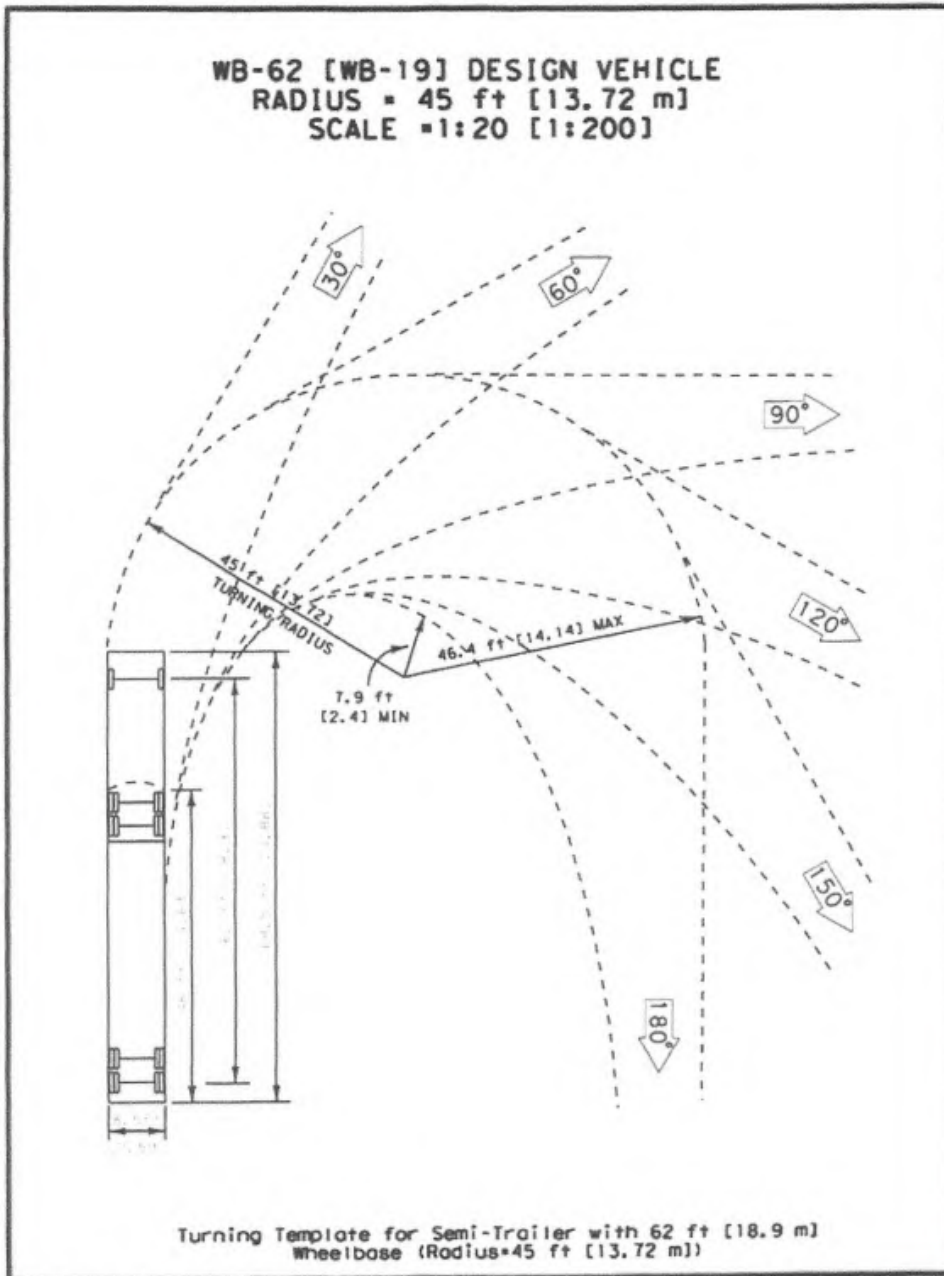


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

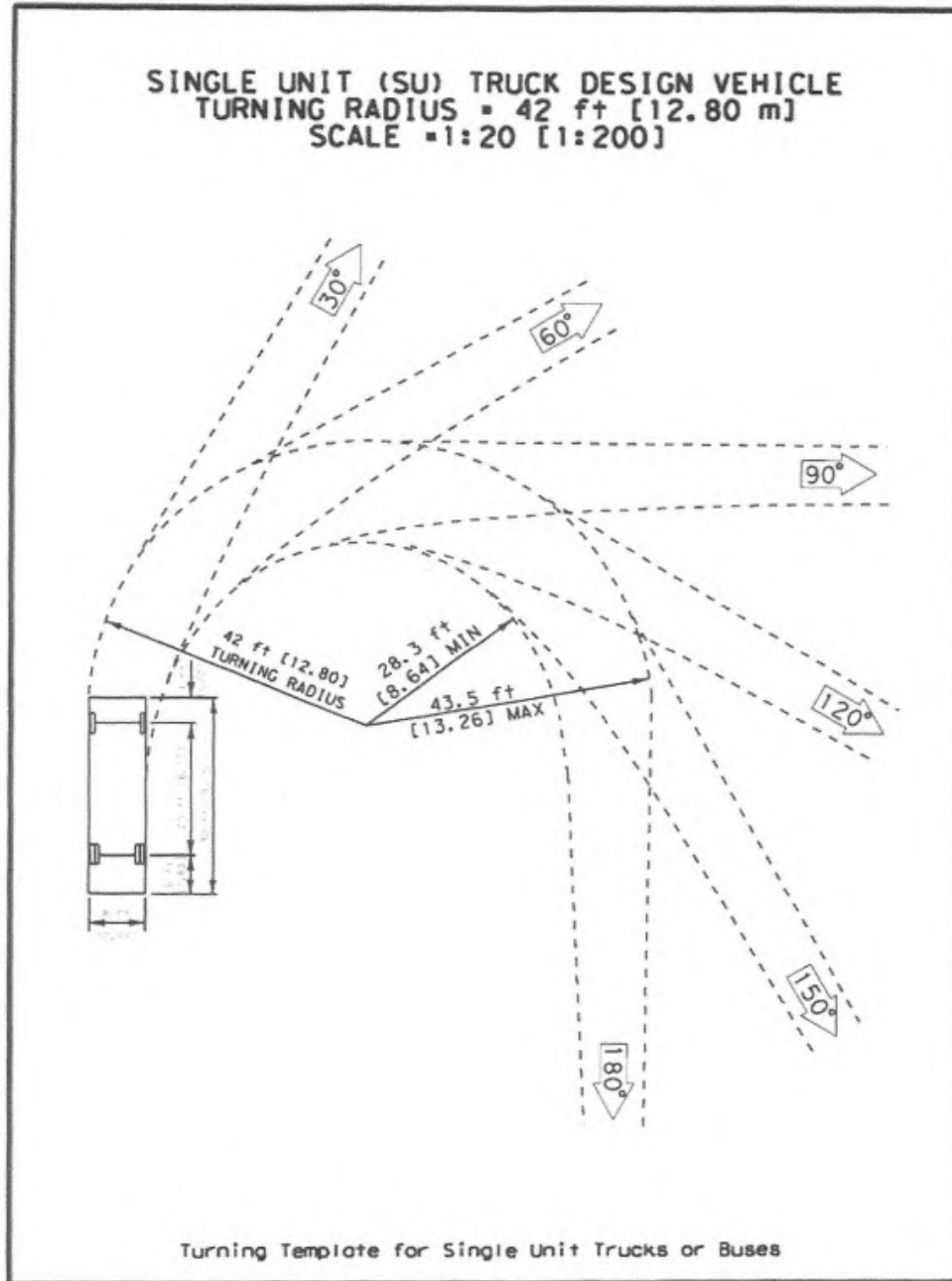


Exhibit 15

**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.

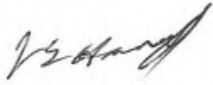
Section 17. TRUCK ROUTES

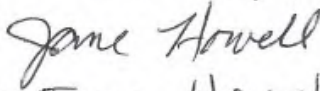
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

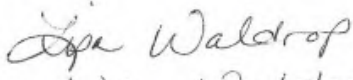
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

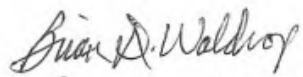
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

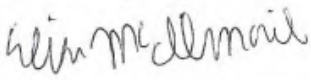
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

SIGNATURE 
PRINTED NAME James E. Howell II
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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
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

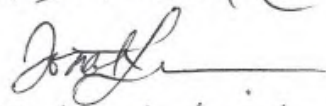

Chris Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

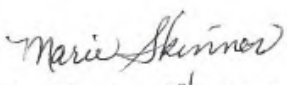

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

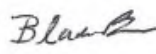

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

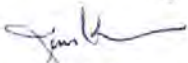
ADDRESS

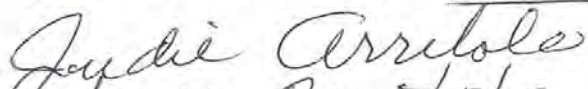
EMAIL

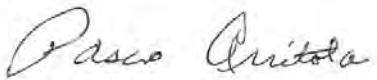

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com


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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

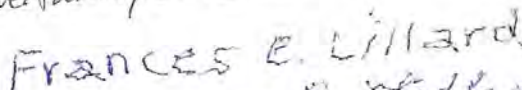
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande OR
EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
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EMAIL Pstola@charter.net


SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

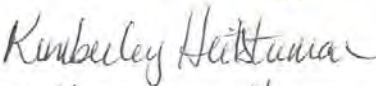
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


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

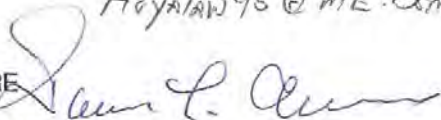
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

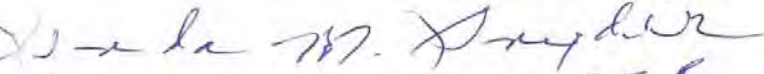
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

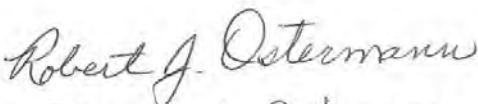
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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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

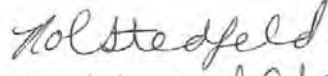
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

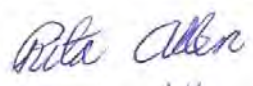
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

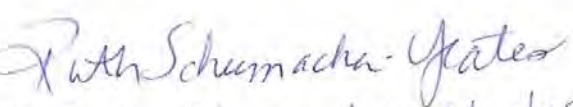
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

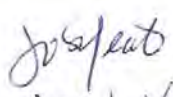
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

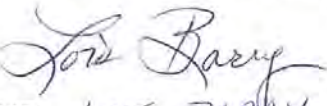
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaire Dr. La Grande
EMAIL rstedfeld@yahoo.com

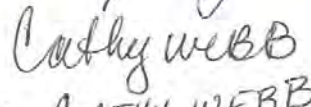
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

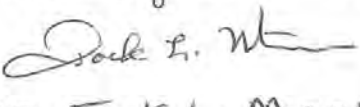
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

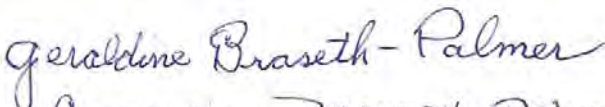

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

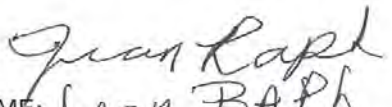
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

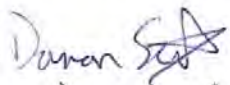
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


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

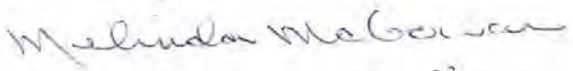
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 BLDENEST DRIVE LA GRANDE, Ore 97850
EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
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EMAIL Jbaph19@gmail.com

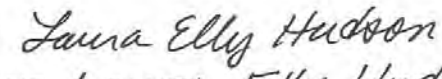
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SIGNATURE 
PRINTED NAME Damon Sexton
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE 
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
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SIGNATURE *Anne G. Cavinato*
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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
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EMAIL asherei@frontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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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 - 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.

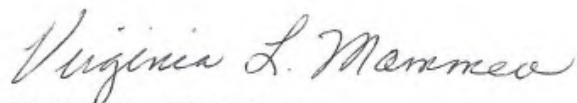
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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,

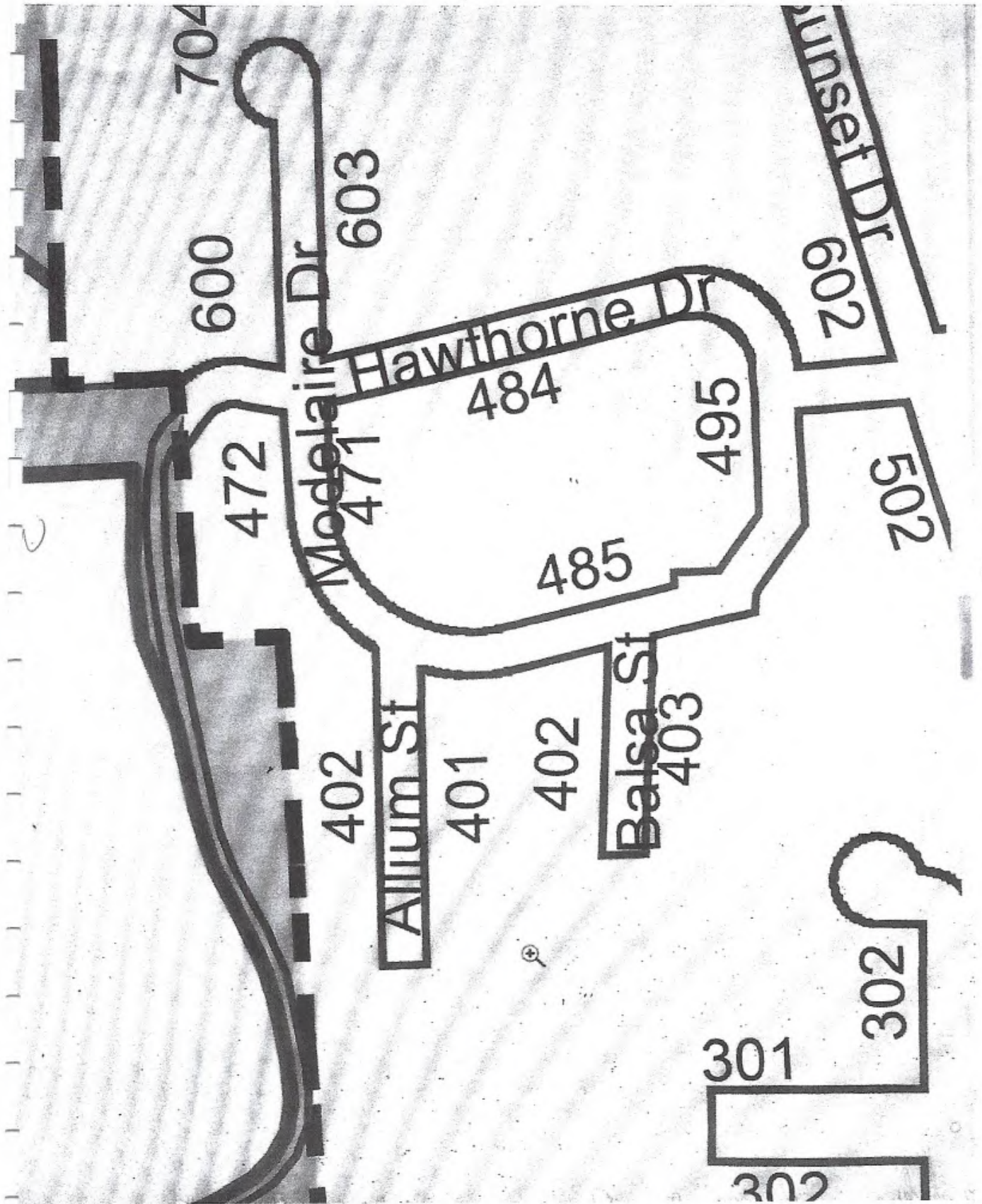


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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.



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.

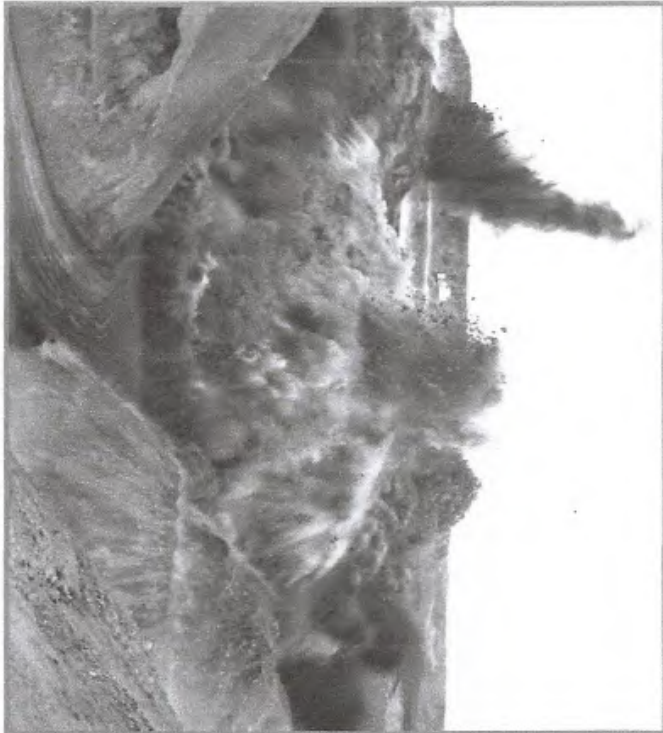
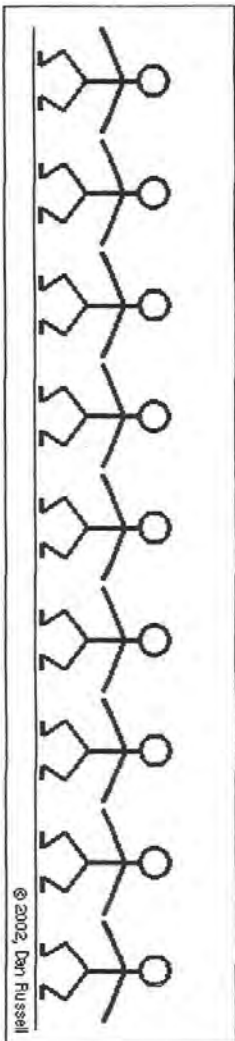


Exhibit 56

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.

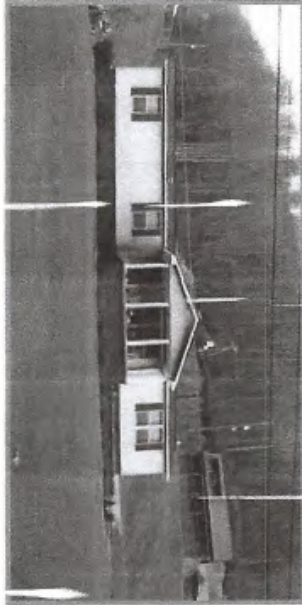
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior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

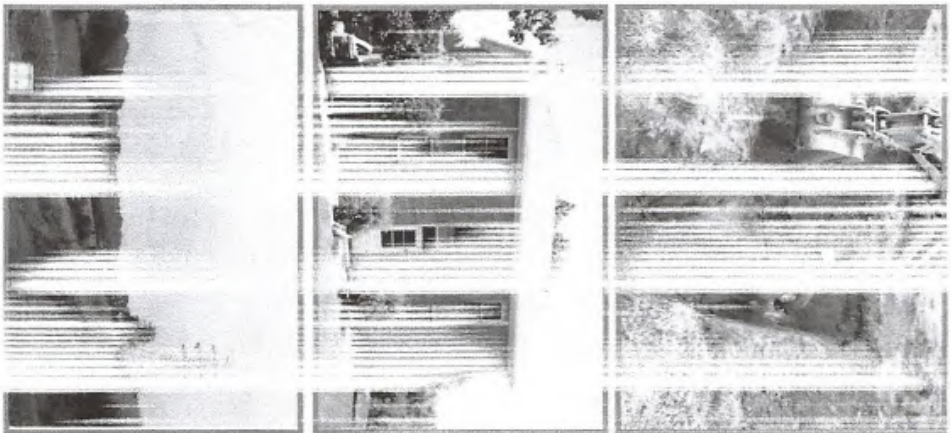
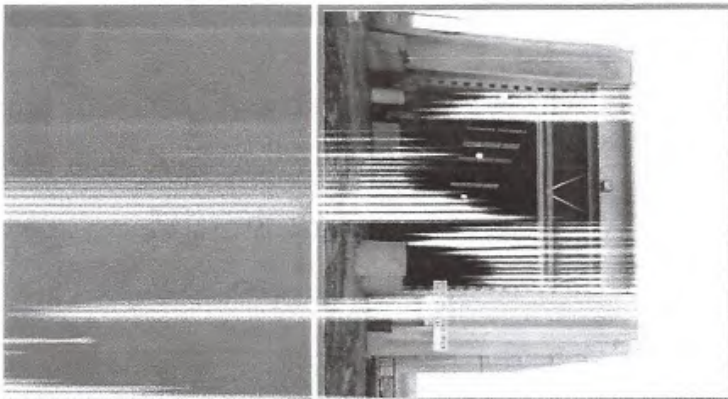
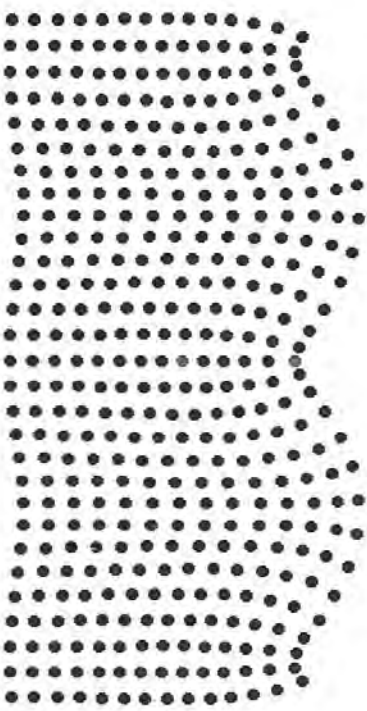


Exhibit 5D

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.

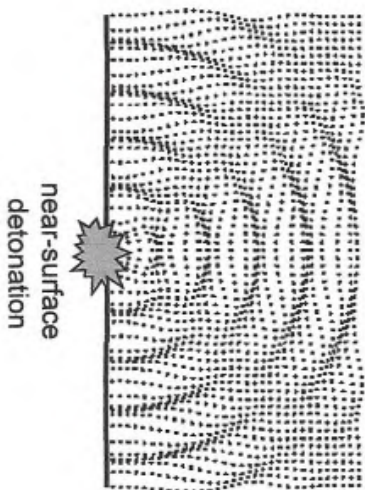
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

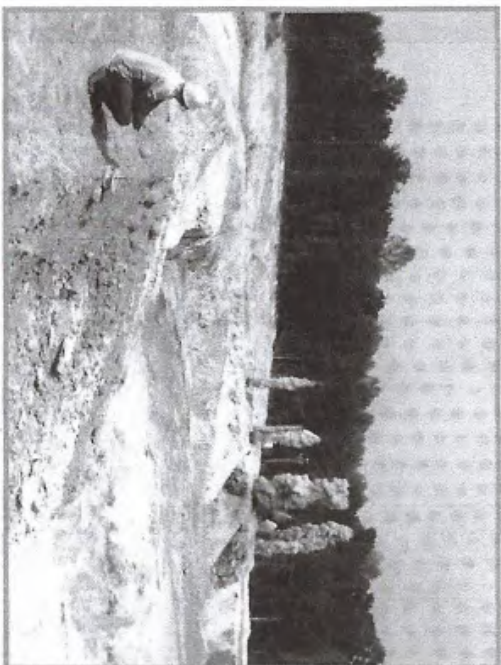
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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



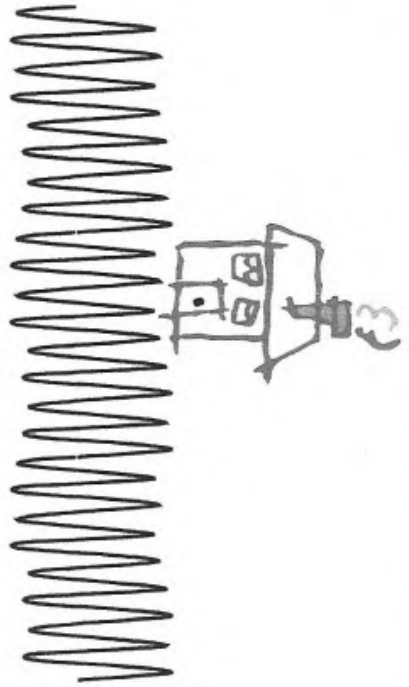
Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

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.

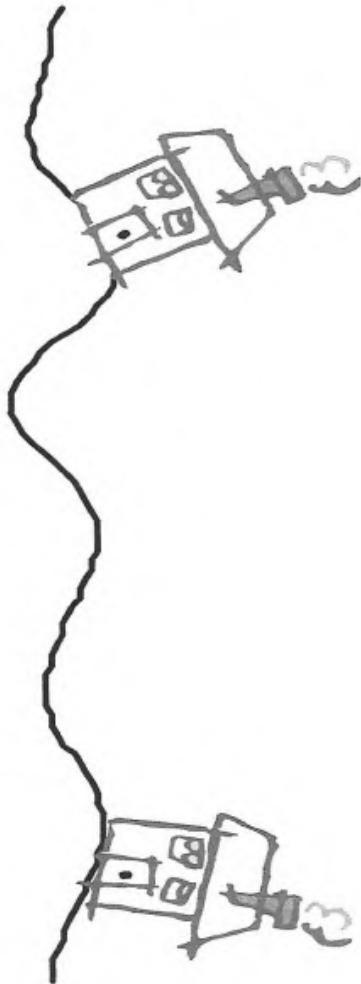


Ground Vibration Structure Response

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

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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

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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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Related articles



8/4/2019

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

Exhibit 10a



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

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Abstract

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

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

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
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[Parents Seek Help for Son with Autism and Recurring Behavioral Crises](#)

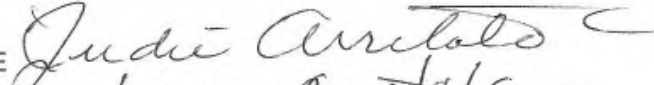


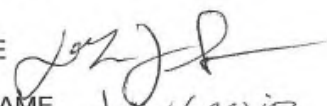
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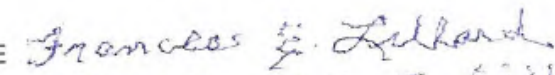
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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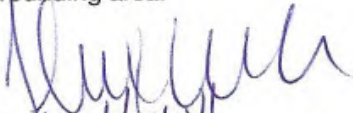
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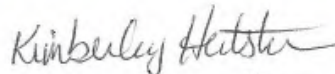
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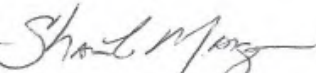
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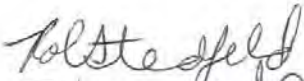
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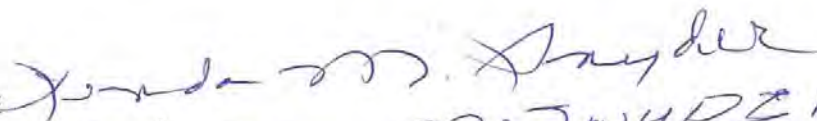
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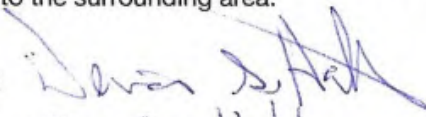
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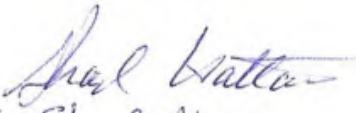
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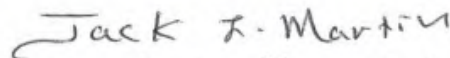
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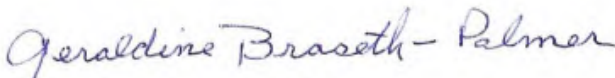
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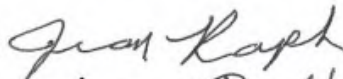
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ESTERSON Sarah * ODOE

From: Gray McGuire <gray.mcguire@gmail.com>
Sent: Thursday, August 22, 2019 4:56 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.
Attachments: EFSC comment.pdf

Dear Chair Beyeler and Members of the Council,

Please see my attached comment.

Thank you,

Donald Gray McGuire

60552 Bushnell Road
La Grande, OR 97850

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

Dear Chair Beyeler and Members of the Council:

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

RECREATION AND TOURISM IMPACTS

National Historic Oregon Trail Interpretive Center

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

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

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

Ladd Marsh

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

Recreation - OAR 345-022-0100

Protected Areas - OAR 345-022-0040

Scenic Resources – OAR 345-022-0080.

Morgan Lake

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

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

WILDFIRE RISK

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

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

NOISE STANDARDS

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

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

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

GEOLOGIC INSTABILITY

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

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

5.2 La Grande Area Slope Instability

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

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

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

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

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years.

This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in

grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

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

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

Signature

A handwritten signature in black ink that reads "Donald". The signature is written in a cursive, flowing style.

Donald Gray McGuire
60552 Bushnell Road
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

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

To: Chairman Beyeler and Members of the Council

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

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

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

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

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

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" 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

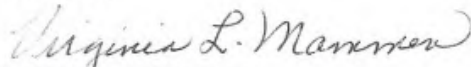
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

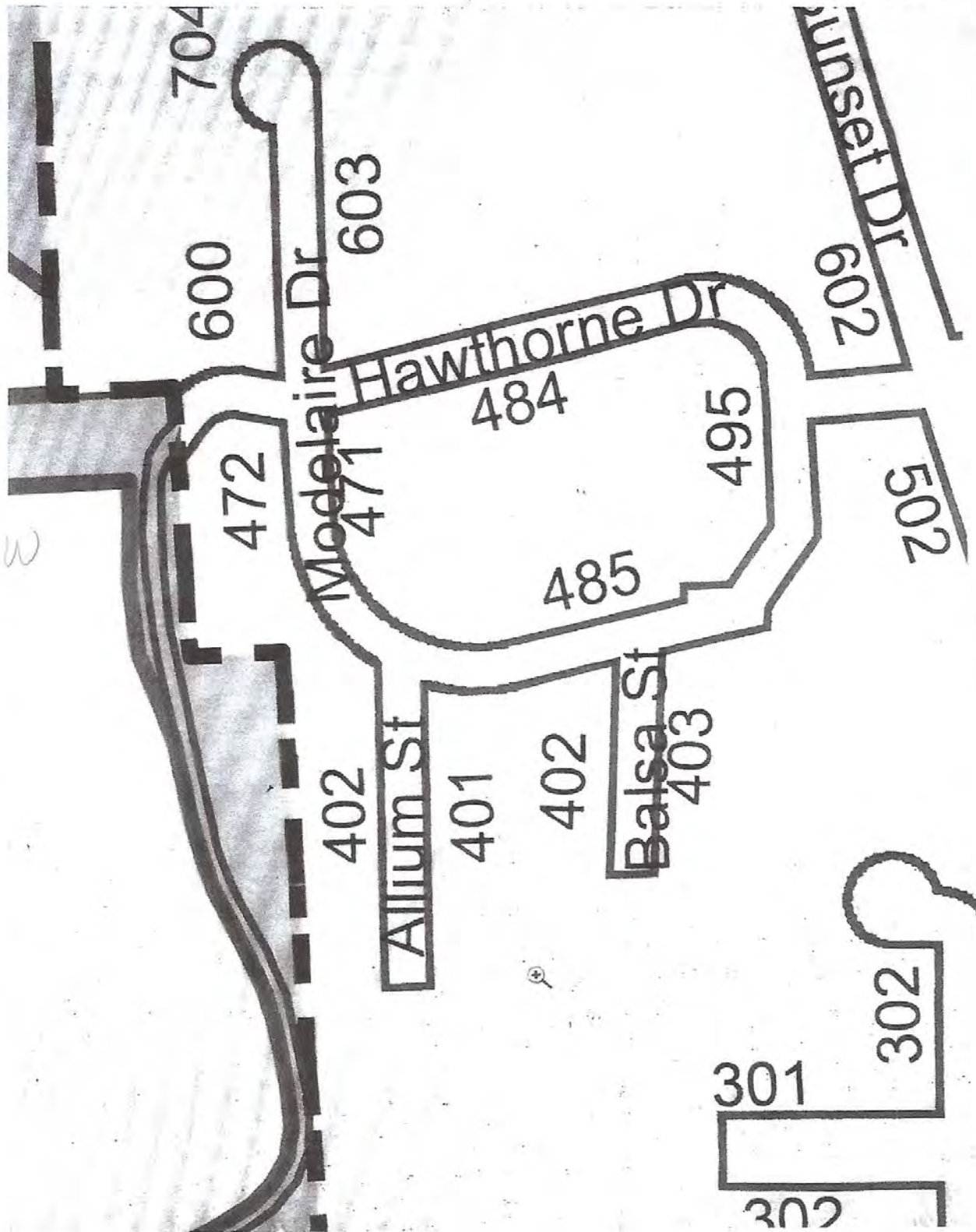


Exhibit 3

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



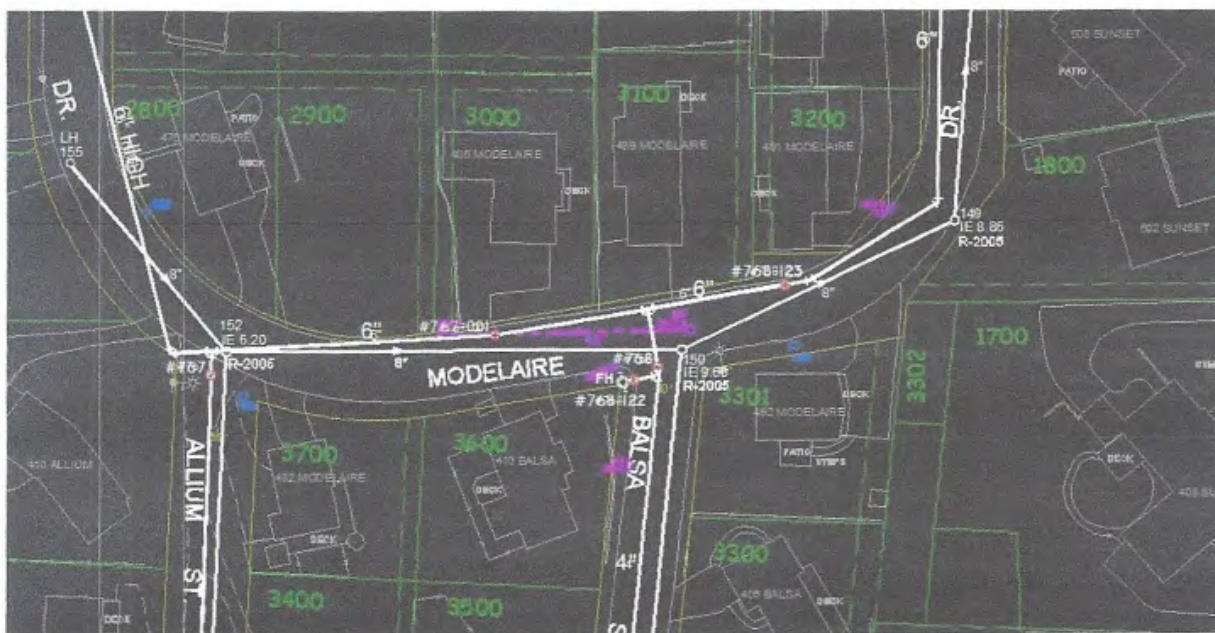
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

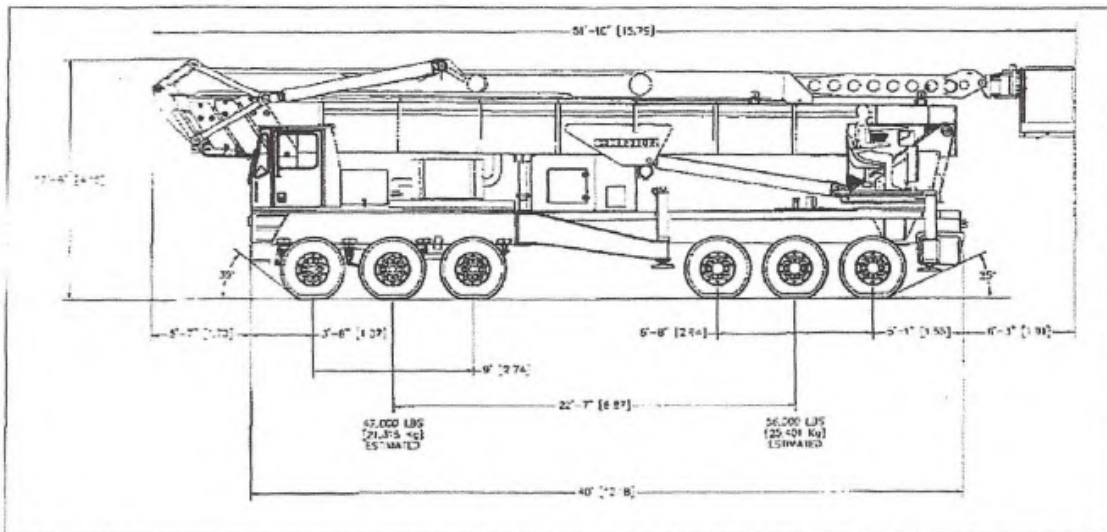


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

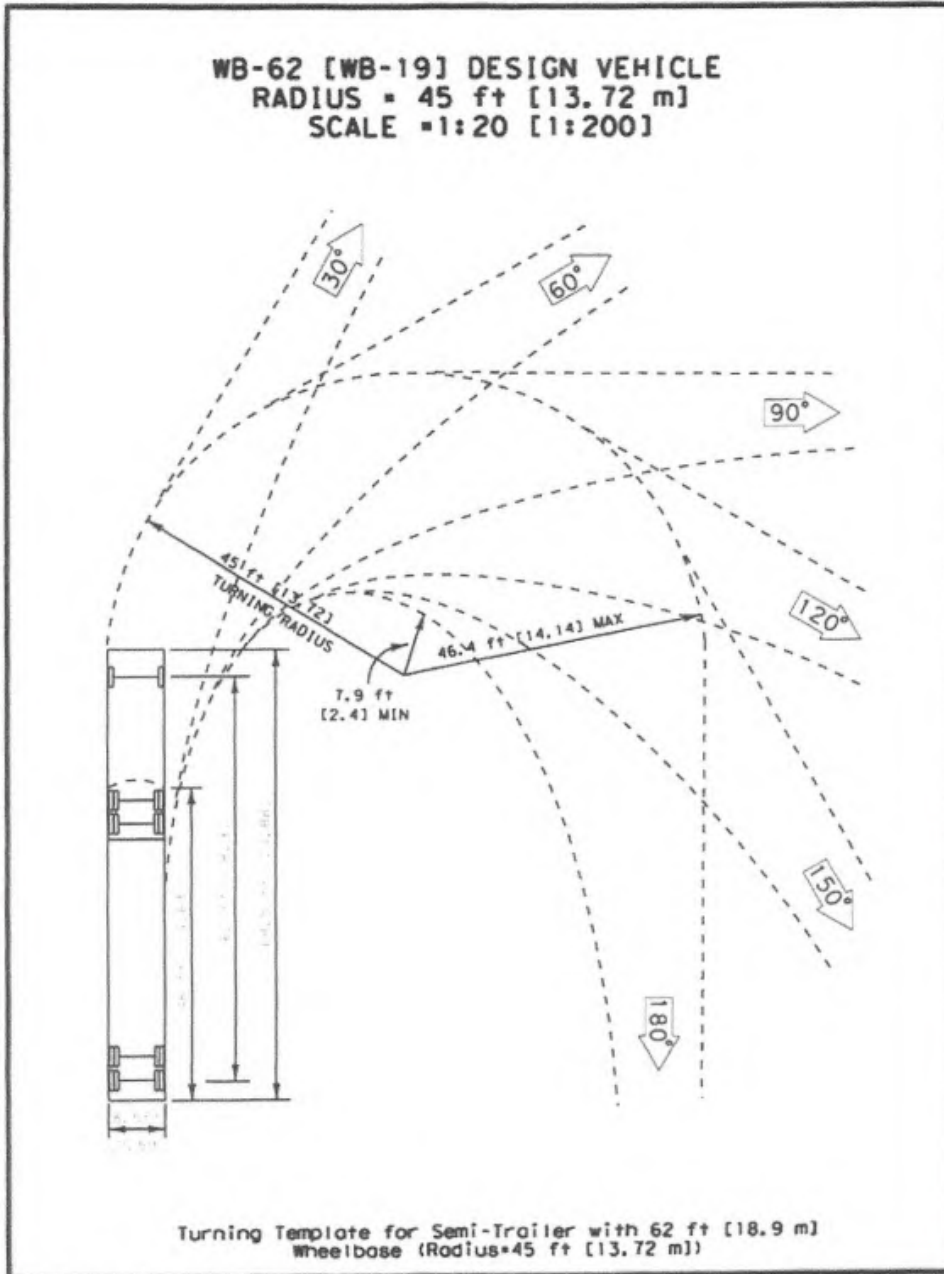


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

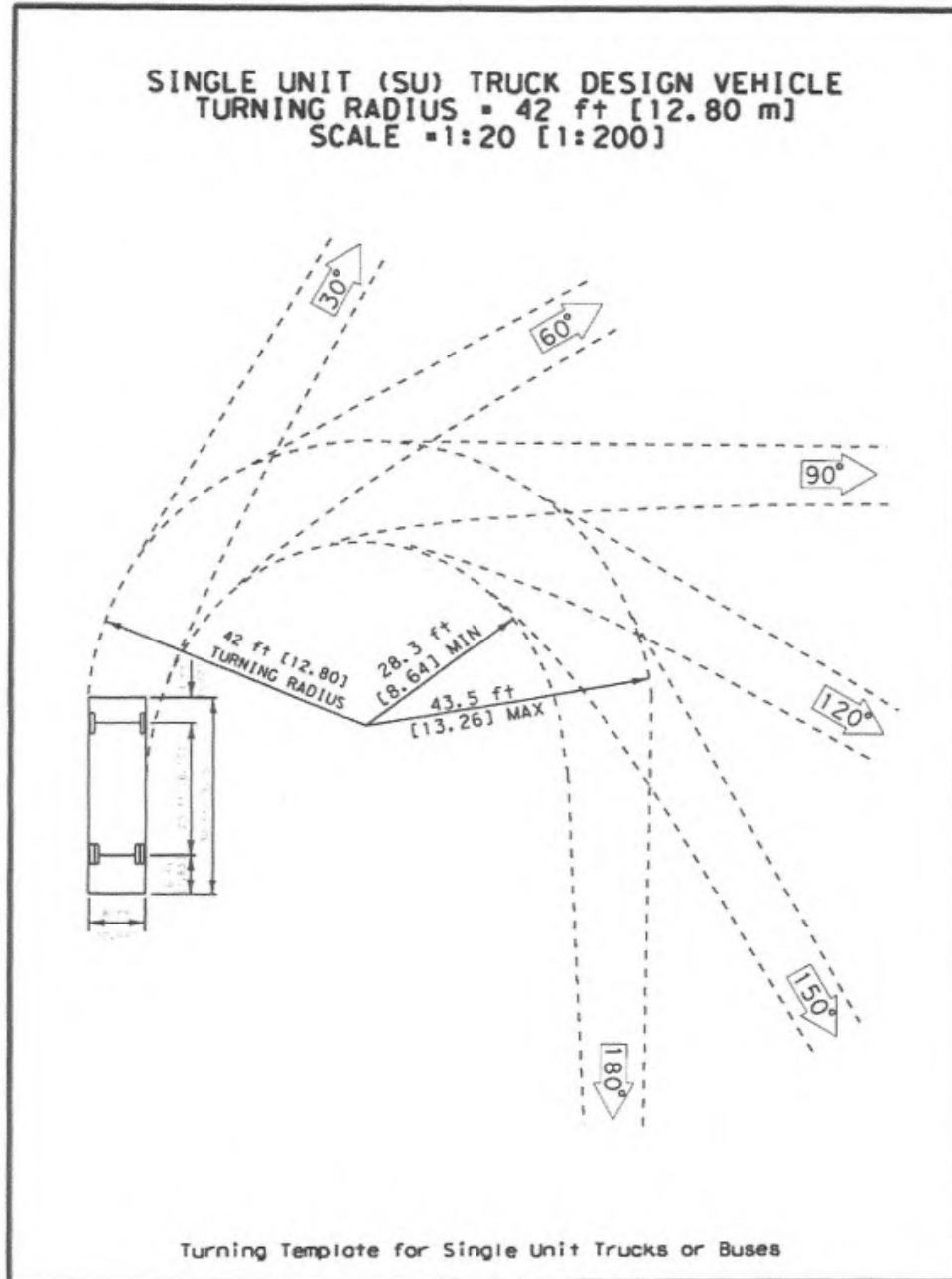


Exhibit 15

**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.

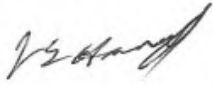
Section 17. TRUCK ROUTES

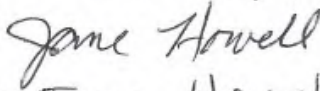
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

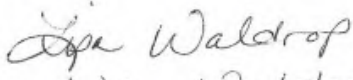
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

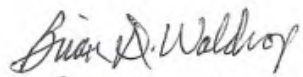
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

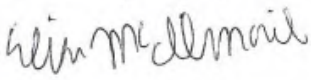
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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

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

SIGNATURE

PRINTED NAME

ADDRESS

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

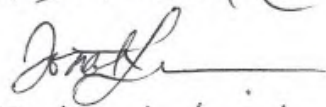

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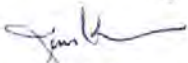
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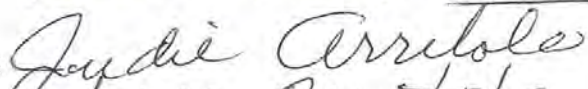
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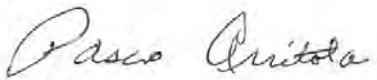
Blake Bars
Blake Bars
1101 G Ave La Grande
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SIGNATURE 
PRINTED NAME Dale Mammen
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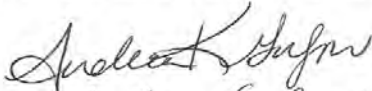
SIGNATURE 
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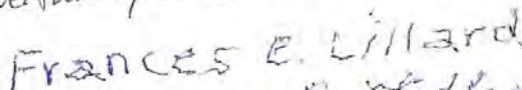
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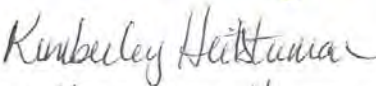
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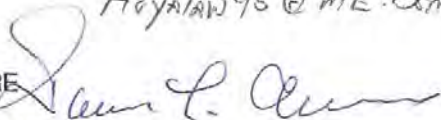
SIGNATURE 
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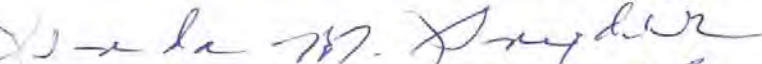
SIGNATURE 
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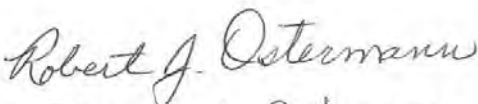
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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SIGNATURE: 
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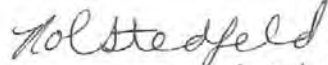
SIGNATURE 
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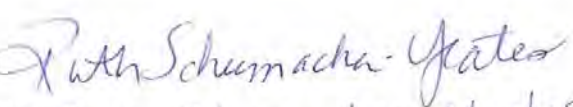
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PRINTED NAME Robin J. Ostermann
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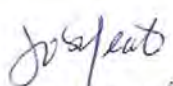
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SIGNATURE 
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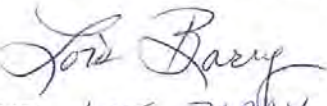
SIGNATURE 
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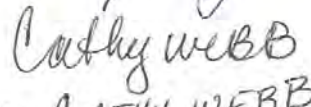
SIGNATURE 
PRINTED NAME Rita Allen
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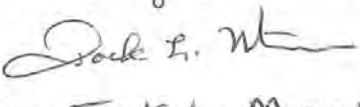
SIGNATURE 
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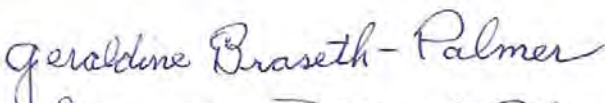

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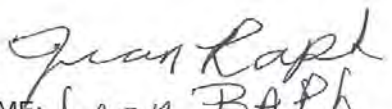
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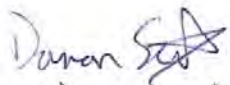
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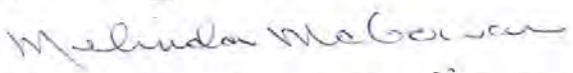
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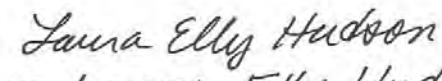
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SIGNATURE *Gary D. Pierson*
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SIGNATURE *Robert J. Sherer*
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ADDRESS
EMAIL

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

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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
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

TARDAEWETHER Kellen * ODOE

From: Mc Iver, James Duncan <James.Mciver@oregonstate.edu>
Sent: Saturday, August 17, 2019 8:52 PM
To: B2H DPOComments * ODOE
Cc: Mc Iver, James Duncan
Subject: Comment on the B2H Project
Attachments: B2H_Comment_McIver_17Aug2019.docx

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

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

16 August 2019

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

Via email: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/19/2019

To Chair Beyeler and Members of the Council:

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

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

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

Sincerely yours,

James McIver

James McIver
Senior Research Associate Professor
Oregon State University

COPY to info@stopb2h.org

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:

James McIVER

Address:

*69565 ANTLES LANE
COVE, OR 97824*

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

August 21, 2019

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

Dear Chair Beyeler and Members of the Council:

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

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

Sincerely,



Jean McKern

64672 Orchard Rd.

La Grande, OR 97850

August 12, 2019

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

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

Sheryl L McNeil
Signature

Name: Sheryl L. McNeil

Address: 201 Terrace Ave
La Grande, OR 97850

12 August 2019

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

Dear Chair Beyeler and Members of the Council:

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

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

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

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

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


(Signature)

Name: Sheryl L. McNeil

Address 201 Terrace Ave

La Grande, OR 97850

August 5, 2019

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

B2H.DPOComments@Oregon.gov

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.

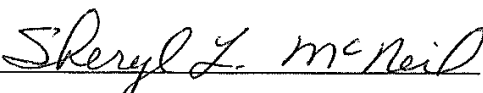
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (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: *Sheryl L. McNeil*
Address: *201 Terrace Ave*
La Grande, OR. 97850

12 August 2019

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

Dear Chair Beyeler and Members of the Council:

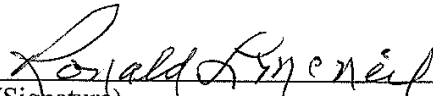
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(Signature)

Name: RONALD L. MCNEIL

Address 201 TERRACE AVE.
LA GRANDE OR. 97850

August 5, 2019

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

B2H.DPOComments@Oregon.gov

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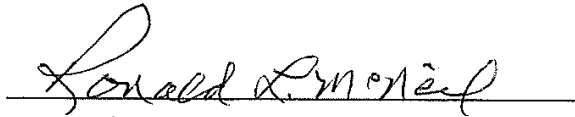
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The Council should DENY the request for a site certificate.

Sincerely,

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

Name: RONALD L. MCNEIL

Address: 201 TERRACE AVE.
La Grande, OR. 97850

August 12, 2019

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

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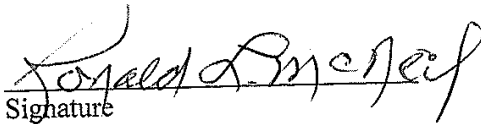
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Signature

Name: RONALD L. MCNEIL

Address: 201 TERRACE AVE.
LA GRANDE OR. 97850



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Margaret L Mead

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

Phone Number (optional) 541 910-6457 Email Address (optional) orestatement

Today's Date: 6/26/19

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

Written comments can also be submitted today.

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

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

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 38</p> <p>1 going to be experiencing a bunch of noise. That is like 2 inhumane to approve something like that. 3 And if the developer thinks that putting 4 noise-blocking blinds up is a way to mitigate for having 5 exceedances of the noise standard. So all these people 6 in all these counties that have beautiful views can 7 choose between going nuts with tinnitus and noise 8 impacts or not being able to see out the front window. 9 So those are not real good options in my mind. 10 I could go on for hours. And my last comment 11 I guess would be, I have done a lot of, spent a lot of 12 time reviewing rules and identifying various areas that 13 are problematic. I'm having a really hard time getting 14 through this application and the draft proposed order 15 and analyzing what it all means. And so I really 16 believe that you have a lot of people out here who are 17 laypeople, and I'm hearing from a lot of them saying, 18 I'm completely lost, I can't understand all this. 19 I think that July 23rd is really not realistic 20 for people -- I'll get through it by July 23rd because 21 I'm willing to working until 2:00 or 3:00 in the 22 morning, if that's what it takes to get through all of 23 these rules. But there are a whole lot of people out 24 there that have jobs -- I'm retired -- and they are 25 struggling.</p>	<p style="text-align: right;">Page 40</p> <p>1 And thank you for showing up. Thank you for 2 listening to me over and over. I hope I covered some 3 different things this time. 4 HEARING OFFICER WEBSTER: Thank you, 5 Ms. Gilbert. 6 We have Margaret Mead next. 7 MS. MARGARET MEAD: My name is Margaret L. 8 Mead. I live at 57744 Foothill Road, La Grande. 9 This doesn't meet a lot of your 10 specifications, but I feel like it's something that 11 needs to be said. And on behalf of a friend who 12 testified last week, he just had said, Would you please 13 say to the Council, listen to people talking. He had 14 the impression last week that people were more involved 15 with their computers or their laptops or whatever. And 16 I said, I really thought that people were taking notes. 17 So I'm just delivering that message. And I guess if I'm 18 the last speaker, it's irrelevant basically. 19 A myriad of reasons Idaho Power's preferred 20 route should not be approved have been presented in 21 previous testimony. My remarks primarily concern Idaho 22 Power's reason for choosing this particular route. It 23 is the least costly for them. Their cost estimation, 24 however, completely ignores the truly important costs, 25 that to the people who live along this proposed line.</p>
<p style="text-align: right;">Page 39</p> <p>1 So it seems to me that 60 days is not a lot of 2 time for them, especially when the Department of Energy 3 has been working on this for years. So that's my final 4 comment. 5 Any questions? 6 HEARING OFFICER WEBSTER: What do you believe 7 would be a reasonable time if Council were to consider a 8 request to extend it? 9 MS. IRENE GILBERT: I think they should have 10 had 90 days anyway. It's not good for me because I plan 11 on going somewhere this summer, and I probably still 12 will. But from what I'm hearing from people, they are 13 just now starting to figure out, at least a starting 14 point, but they are overwhelmed. 15 HEARING OFFICER WEBSTER: So total of 90 days 16 or -- 17 MS. IRENE GILBERT: A total of 90 days. 18 Another 30 days I think would be reasonable to give 19 people. Like I say, they are just starting to figure it 20 out. 21 HEARING OFFICER WEBSTER: Okay. I think, as I 22 indicated at the outset, we will approach, that Council 23 will approach that request I think at the end of the 24 public comment tonight. 25 MS. IRENE GILBERT: Thank you.</p>	<p style="text-align: right;">Page 41</p> <p>1 And yes, we, the people, matter. We live and 2 work here, we pay taxes, we are engaged in volunteer 3 activities that make our community better. We own 4 businesses, farms, ranches, and homes. We might have 5 been born here or we chose to live here, often because 6 of the natural beauty that surrounds us. We have a 7 quality of life that is not found in urban areas. 8 Should this line be built as proposed, that 9 quality of life will be greatly diminished. 74 percent 10 of the land along the preferred route is owned by 11 private persons, with only 26 percent being public. 12 What right does a corporation have to usurp 13 our private lands, this land individuals have cared for 14 and that provides a livelihood and/or a place of refuge, 15 our homes? 16 I understand eminent domain as a privilege 17 only for the government, which, theoretically, is for 18 the public's good. Corporations should not have the 19 capability to take from private persons. The cost to us 20 is great and immeasurable. 21 My Minnesota story, which I share because it 22 is similar to what millions of other people throughout 23 the United States have experienced. And I really hope 24 that the people who live along the proposed route won't 25 have to.</p>

Page 42

1 You have heard many in eastern Oregon counties
2 speak to this personally what the effects would be on
3 them. For example, a tower being built where a house
4 currently stands. I grew up on a farm in the Red River
5 Valley of Minnesota, flatland with rich soil. In the
6 late '60s I had moved away by then. The freeway began
7 to be built in the area. It cut through my parents'
8 half section, leaving a 40-acre triangle on one side of
9 the freeway and the majority of acres in a triangle on
10 the other.
11 This ultimately resulted in a 4-mile drive
12 each way, often with farm equipment to get to the
13 smaller acreage, thus adding more time and cost, as well
14 as inconvenience of farming this smaller section. The
15 same applied to farming triangles; more costs, more
16 time, being much less efficient than farming a
17 rectangle.
18 In Minnesota we get rain; and, therefore, we
19 have deep and wide ditches. The freeway construction
20 screwed up the drainage system which wasn't fixed until
21 1996, when my mother had to pay \$90 an acre to have it
22 done. There was no governmental compensation for any of
23 these added expenses which exist still today.
24 From the time my parents knew their land was
25 going to be taken, until many years later, my mother was

Page 43

1 upset and often angry about it. And this, of course,
2 affected those around her. The inconvenience, the extra
3 costs, the constant noise, the pollution caused by the
4 diesel vehicles all contributed to this.
5 When Mom moved to town, my nephew moved to the
6 farm, and although he planted even more rows of trees
7 than what already existed in an attempt to block the
8 freeway noise, it bothered him and he eventually moved.
9 Yesterday I asked a local counselor if she was
10 seeing more people who were depressed or angry due to
11 this proposed B2H line. She said, Yes, whenever there
12 were additional stresses that caused people to feel
13 helpless, her business increased. It wasn't something
14 she wanted.
15 Our property is adjacent to the freeway near
16 Ladd Canyon. We look out on the foothills. I drive
17 Foothill home whenever possible. The beauty relaxes me
18 and is a type of medication. Should the power line be
19 constructed along there, and especially along the
20 Miracle Mile, the scenic value would be ruined.
21 These costs, emotional, personal hurt,
22 stress-related health issues, inconveniences, extra
23 work, immediate and ongoing expenses, as well as
24 long-term effects we can't yet know add up. They take a
25 toll on us, the citizens. Idaho Power will not be

Page 44

1 compensating for these costs, many of which cannot be
2 paid for with money.
3 Most landowners would also not have the
4 resources to sue for damages; farming and ranching,
5 usually not being lucrative operations.
6 I have heard the Grande Ronde Valley is the
7 largest circular valley in the US. Please help us keep
8 its natural beauty and not discard it with the ugly
9 monstrosities Idaho Power wants to erect in this very
10 scenic area. There are other options if indeed this
11 line has to be built at all.
12 There are strong reasons for building
13 microgrids or none at all, but that is a different
14 chapter.
15 With all the testimonies you have heard, you
16 must have a strong sense of the devastating impact this
17 power line would have on the natural lands and all the
18 critters, including humans, who would be affected should
19 it be built as Idaho Power wishes.
20 I conclude with these questions: Does Idaho
21 Power have the right to determine the negative impacts
22 on our environment and our personal lives? Do we the
23 people not matter? Please hear us.
24 And I also request that the deadline be
25 extended because summer is a very busy time for many

Page 45

1 people along this route. Thank you.
2 HEARING OFFICER WEBSTER: Thank you.
3 I have received an additional comment request
4 So we'll hear from Fuji Kreider.
5 MS. FUJI KREIDER: Good evening. Fuji
6 Kreider, 60366 Marvin Road, La Grande.
7 I really did not plan on continue speaking
8 tonight, but I didn't realize that you might be actually
9 contemplating extending the comment period. So I
10 thought, I have to talk about this.
11 Margaret mentions the stress and all that is
12 going on. It's been very intense. It isn't just within
13 our group and these hearings of late, it's been going on
14 for quite some time. But I wanted to focus on the
15 media, which is since last week you all heard everyone
16 speaking very passionately about what's going on. The
17 phone, emails, everything has been nonstop, over the
18 top. People are so confused about where even to find
19 the table of contents, how to navigate the draft
20 proposed order, the application, et cetera.
21 Back when you had the informational meetings
22 last November, I asked Kellen and the staff that were
23 there, How long will it be for the comment period?
24 Kellen said, How long do you need? I said, We need at
25 last 6 months. You guys have had way longer than that.

at a friend's request

11. - 1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

to conclude with these questions!

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

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

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

Margaret L. Mead
57744 Foothill Road
La Grande, OR 97850
541-910-6454
summersowwinterweave@gmail.com
26 June 2019

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

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

Issue Statement

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

Related Statutes and Rules:
OAR 345-022-0030

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

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

Margaret L Mead

Margaret L Mead
57744 South Hill Road
La Grande OR 97850

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

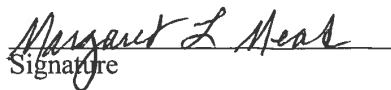
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources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

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

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

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

Sincerely,


Signature

Printed Name: Margaret L Mead
Mailing Address: 57744 Foorthill Rd
LaGrande OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
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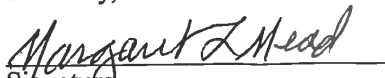
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Mailing Address:

57744 Foothill Road
La Grande OR 97850

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

August 5, 2019

B2H.DPOComments@Oregon.gov

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

To: Chairman Beyeler and Members of the Council

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

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

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

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

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

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within 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: Margaret L Mead
Address: 57744 Foothill Road
La Grande OR 97850

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

August 5, 2019

B2H.DPOComments@Oregon.gov

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Address: *51744 Foothill Road
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August 5, 2019

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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: Margaret L Mead

Mailing Address: 57744 Foothill Rd
La Grande OR 97850

July 27, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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: 57744 Foothill Rd
La Grande OR 97652

References

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

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

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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 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: Margaret L Mead
Address: 57744 Foothill Rd
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.

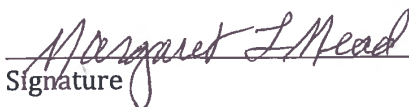
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming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


Printed Name

Mailing Address:

51744 Foothill Road
Le Grand OR 97857

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 Margaret L Mead
Address 57744 Foothill Rd
Le Grande OR 97650

August 2, 2019

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

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


Signature

Margaret L Mead
Printed Name

Mailing Address:

5774 Foothill Road
La Grande OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Christine Manofascina

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

Phone Number (optional) () _____ Email Address (optional) christine-m-m-201

Today's Date: 6-19-19 @ gmail / CC

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

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

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

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 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.

Page 63

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

Page 65

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

Page 66

1 between here and La Grande? What do you think that's
2 going to look like out in that cow pasture? Are the
3 cows going to be happy? No. They aren't happy now when
4 it gets hot or it snows. I'm not happy when it gets hot
5 and it snows. There's a lot that needs to be said and
6 done here.
7 Now, Idaho could rectify this by putting in a
8 natural gas plant. It's expensive but they're close to
9 Wyoming, and there's lots of natural gas there. And
10 Wyoming is not that pretty of a state. I've been there
11 many times, I used to drive long haul from Boise to
12 Chicago twice a week. Lots of open area from Blackfoot
13 to Sinclair. They have the big towers, they have the
14 natural gas. There's a natural gas pipeline that runs
15 to the West Coast. Put it in, extend it.
16 Don't put the towers through this valley
17 because we're going to stop you. And I like to talk a
18 lot. I have nothing to lose. Shoot, I've been camping
19 for a day and look at this, I still look good.
20 So come on, really, we need to think about
21 this. We need to get together, inform the people,
22 there's got to be a solution. I know this needs to
23 happen. We need to get eastern Oregon bigger, we need
24 to help Idaho. I get that. But we cannot do it running
25 down 84 where everyone sees. We cannot do that.

Page 67

1 There's a big mountain up there, I know there's a
2 airstrip because I fly. Put it up there. Go over the
3 mountain. It's going to cost more.
4 But even though you're not going to start
5 building until 2023 when most of us will be gone or in a
6 home or not able to remember this meeting, it's going to
7 make a difference on the kids, and the kids that are
8 going to come and visit you in that retirement center.
9 Not in Salem, not in Washington, DC. But every rancher,
10 and I heard somebody saying, Oh, we're not going to get
11 the promises. You know, it's politics. Forget about
12 the promises, we all know how that worked out. So
13 that's off the board.
14 We're all going to get together, we're going
15 to be informed and we're not going to go on Facebook and
16 push "like" any more. We're going to get people to
17 these meetings. The '60s were great. We need to go
18 there.
19 Thank you.
20 HEARING OFFICER WEBSTER: Thank you.
21 MS. FUJI KREIDER: I'm Fuji Kreider, 60366
22 Marvin Road, La Grande. That's all you need; right?
23 HEARING OFFICER WEBSTER: Yes. If you would
24 spell your last name.
25 MS. FUJI KREIDER: K-r-e-i-d-e-r.

Page 68

1 HEARING OFFICER WEBSTER: Thank you.
2 MS. FUJI KREIDER: I was not planning on
3 speaking tonight but a couple things came up that I've
4 been hearing about and I just want to make a couple
5 comments. It won't even take the whole time I don't
6 think.
7 I am with the Stop B2H Coalition. I'm a board
8 member. We are not a NIMBY organization; we are
9 activists fighting the line entirely. I'm not talking
10 about moving the line; we do not want the line.
11 However, you will hear, as you heard tonight
12 and you'll hear all along the way, and all the public
13 comments will be directed towards your standards and
14 about the siting of the line, all the impacts that
15 you've heard tonight and more, so I won't get into that.
16 What I do want to just say is I related to the
17 cost and some of the issues that I've heard tonight
18 mentioned. Things are changing for Idaho Power.
19 Technology is changing radically and the costs are also
20 changing. I started in the 2015 OPUC docket. Since
21 that time I've attended every Idaho Power Integrated
22 Resource Planning meeting in Boise. I go every month;
23 anywhere from two to five of us attend those meetings
24 every month. We went through eight meetings and a
25 workshop in the 2017 IRP and the PUC docket. We've been

Page 69

1 to every meeting in the 2019 IRP. The docket will be
2 opened in the summer when OPC opens it up.
3 Much of what I -- well, generally a lot of
4 what I talk about with cost I will be referring to the
5 PUC on to protect the ratepayers. But I do want you to
6 know that this B2H line is not the only option. It is
7 not the only option for Idaho Power. And the options
8 keep changing. As technology keeps changing, they have
9 more and more options.
10 Also, the cost of things are going down. So
11 back in the 2017 IRP days, when we insisted put
12 batteries, put stored, put some alternative technologies
13 into your Integrated Resource Plan, it was like, Oh, no,
14 no, no, that's too far out. Ten, 20 years from now I'll
15 say, Well, it seems like it's coming awfully sooner than
16 that. Talk to the Idaho Power executives and stuff that
17 are in the room, Oh, I agree with you, Fuji, yes,
18 distributed generation and distribution is the way of
19 the future, but that's still 20 years out.
20 Well, next round IRP 2 years later, we're a
21 year and a half later, solar and batteries are in their
22 Integrated Resource Plan. They just signed on with
23 Jackpot Holdings, the cheapest solar in the country.
24 Things keep changing.
25 Now, when you hear tonight a number of things

TARDAEWETHER Kellen * ODOE

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

August 19, 2019

Dear Chairman Beyeler and Members of the Council,

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

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

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

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

Yours sincerely,

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



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Anita Metten

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

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

Today's Date: 6-20-19

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

Written comments can also be submitted today.

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

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

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 62</p> <p>1 preparing for tonight, I pulled up some comments that I 2 had written earlier. And these comments, I won't 3 provide them tonight because I printed them out on some 4 other stuff I'd prefer not to share with you. But I've 5 already sent them to you. And these are dated 6 September 2010. I'm not going to read them, I'm just 7 going to use them as a cheat sheet for myself to page 8 through some of the topics that I want to cover. 9 I'm going to focus on forests and the 10 grasslands and the wildlife and the fish. Just in terms 11 of background, I have a bachelor's degree from Cornell 12 University, where I studied forestry and arboriculture. 13 I have been a certified arborist in good standing for 14 the last 23 years. I have lived and worked in northeast 15 Oregon for almost 40 years, and during that time I have 16 studied extensively the forests and the grasslands of 17 this area. 18 One of the most important aspects of our 19 ecosystems is the connectivity of a variety, a wide 20 variety of habitat we have here, forests and 21 non-forests. And connectivity is the way that plants 22 and animals can move across the landscape. As we 23 continue to see the effects of climate change, that 24 connectivity is going to be so much more important. 25 Constructing a power line through the middle</p>	<p style="text-align: right;">Page 64</p> <p>1 forest, our shared public lands, will be clear-cut as a 2 part of this project and will be maintained in a 3 non-forest condition. 4 Also, the Forest Service has waived their 5 requirements for protecting riparian areas, and they 6 waive their protections for large trees and older trees 7 with this project. 8 I have looked at the new draft proposed order 9 for the project. I have not found a total on the 10 acreage of private land forests that will be clear-cut, 11 but I assume it's extensive also. These are really 12 important ecological damages that will result in this 13 project. 14 Let's see, just to name a few wildlife 15 species, sage-grouse down in Baker County. In Union 16 County this line would cross some of the most important 17 and the most valuable elk habitat in the state of 18 Oregon, just south of La Grande here. And pronghorn 19 antelope and mule deer, they all need habitat, they all 20 need to be able to migrate, they all need connectivity 21 of habitat. And this line would severely damage all of 22 those functions. 23 I did want to read one section that I wrote 24 8 years ago, 9 years ago. It says: "Rural Oregon tends 25 to have higher poverty rates, lower wages and higher</p>
<p style="text-align: right;">Page 63</p> <p>1 of these native forests and grasslands goes right 2 against the concept of connectivity because by the 3 nature of it you are disrupting it, you are creating a 4 barrier. 5 It was mentioned earlier that in the forested 6 areas that the right-of-way would be 300 feet wide. And 7 in layman's terms what that means is there is going to 8 be a 300-foot wide clear-cut through all the forests 9 that this power line crosses. 300 feet is the length of 10 a football field. So if you stand at the zero yard line 11 and you are looking clear down to the other end of the 12 100-yard football field, that is going to be width of 13 the clear-cut through the forest. 14 Personally I feel like clear-cuts are not a 15 good thing to begin with, but under a power line it's 16 always going to be a clear-cut, and it's going to be 17 maintained either by cutting down the trees and shrubs 18 that grow back in or spraying with herbicide. Herbicide 19 is a necessary tool, but it comes with a lot of 20 environmental damages, and creating a new magnet for 21 herbicide is really just a bad idea. 22 I have reviewed the environmental impact 23 statement, and I objected, we objected to the national 24 forest decision on this project. And one of the reasons 25 we did is because several hundred acres of national</p>	<p style="text-align: right;">Page 65</p> <p>1 unemployment than the urban areas where the electricity 2 would be shipped. Environmental justice is not served 3 when these rural areas are saddled with the 4 environmental cost of a transmission line and more 5 affluent urban areas are the primary beneficiaries." 6 That remains true, and that is just not right. 7 So my time is almost up. In conclusion, I 8 would just -- I hope -- again, I want to thank you for 9 coming and listening, coming to the community where we 10 all live. 11 I mentioned some of the challenges we face in 12 the community, but we are a strong community. So I urge 13 you to do the right thing and prevent this line from 14 being built. 15 Thank you. 16 HEARING OFFICER WEBSTER: Thank you. 17 Following Ms. Metlen we will have Joe Horst, 18 and I think we will do one more after Mr. Horst. We'll 19 hear from Gail Carbiener, then we will take our break. 20 MS. ANITA METLEN: Good evening. Thank you 21 for hearing me and allowing all my fellow community 22 members to make comments on this project. My name is 23 Anita Metlen. I live at 65208 Hull Lane, Imbler, Oregon 24 97841. 25 I strongly agree with all the previous</p>

Page 66

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

Page 67

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

Page 68

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

Page 69

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

June 20, 2019

B2H Committee

Thank you

Dear Sirs,

Agreement with other presenters

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

- 1/3 yrs. MWP - RR - our personal use, guest to area
I am opposed to the installation of this transmission line. My greatest concern is the damaged that the system would cause to the view shed for the countryside that it travels through. If the lines could be buried or existing tower lines enhanced to serve your purpose that would be much better alternative.

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

12.8 Billion - 2014 Stats
Rural areas are dependent upon tourism. Tourists do not travel to ponder a power grid. Those who live in rural areas made the choice to live where the countryside is not marred by manmade structures. Please do not ruin the view shed for eternity with your towers and lines. Our future is the continued livability of the place we live, work and play. Our future requires that we maintain a view shed that is not marred by large unsightly towers and miles of wire.

Sincerely and with great concern,

Anita Metlen

65208 Hull Lane
Imbler, OR 97841
metlenam@gmail.com
541.910.0089

Suggestion: Think outside the box -

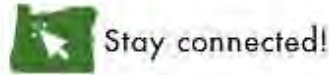
Devise a method to install the line on the ground in a conduit of some type.

TARDAEWETHER Kellen * ODOE

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



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



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

Hi Kellen,

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

Thanks,
Max

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

Sent from [Mail](#) for Windows 10

July 23, 2019
Energy Facilities Siting Analyst
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E
Sale,, OR 97301
B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

The Power of Travel and Tourism

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

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

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

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

Alternatives to the present proposal

- DEVELOP SOLAR FARMS IN IDAHO WITH SHORT TRANSPORTATION LINES TO SERVE CUSTOMERS CLOSE TO THE GENERATION SOURCE.**
- DEVELOP WIND FARMS WITH SHORT TRANSPORTATION LINES TO SERVE YOUR CUSTOMER BASE.**
- BURY THE LINES.**
- REFURBISH EXISTING TOWER LINES TO SERVE THE INCREASED CAPACITY.**

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

Sincerely,

Kim Metlen

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

TARDAEWETHER Kellen * ODOE

From: Karen Meyer <karen@greenfireproductions.org>
Sent: Friday, August 16, 2019 12:23 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.
Attachments: Comments-Karen-Anspacher-Meyer.pdf

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

Thank you,
Karen Anspacher-Meyer

August 16, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. I have lived in La Grande for 14 years, My house is at the edge of the city limits and very close to the proposed project. I am greatly concerned about this proposed transmission line for a number of reasons. I will focus on slope stability and risk of wildfire in this letter.

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

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

5.2 La Grande Area Slope Instability

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

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

The next significant hazard to our community is wildfire. Oregon is ranked 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,



Karen Anspacher-Meyer
308 C Avenue
La Grande, OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) MICHAEL MEYER

Mailing Address (mandatory) Gene St, Baker City

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

Today's Date: _____

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

<p style="text-align: right;">Page 46</p> <p>1 HEARING OFFICER WEBSTER: Thank you. 2 After Mr. Meyer, we will hear from Laurie, is 3 it Solisz? 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>	<p style="text-align: right;">Page 48</p> <p>1 on with the Interpretive Center, which is a beautiful 2 museum -- and if you people are not from here, I would 3 highly recommend you going there. It is so inspiring. 4 I cry every time I go. This bump is the Interpretive 5 Center. So this is looking east. The Interpretive 6 Center looks west, which is the towers are going to come 7 up, supposedly not be able to be seen, under the 8 Interpretive Center. 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>
<p style="text-align: right;">Page 47</p> <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>	<p style="text-align: right;">Page 49</p> <p>1 experienced disturbance. And everyone claims ignorance, 2 Oh, we didn't mean to do that. Well, we didn't think, 3 and so forth. But it happens, and we are the ones that 4 bear that burden. 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>

TARDAEWETHER Kellen * ODOE

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

Kellen Tardaewether, Senior Siting Analyst

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

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

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

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

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

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

Sincerely,

Mike Meyers

University of Tennessee

Institute for Public Service

Sent from [Mail](#) for Windows 10

TARDAEWETHER Kellen * ODOE

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

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

Sent from my Verizon, Samsung Galaxy smartphone

ESTERSON Sarah * ODOE

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

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

Sent from my Verizon, Samsung Galaxy smartphone

TARDAEWETHER Kellen * ODOE

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

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

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

Sincerely,
John B. Milbert
1812 Jefferson Ave
La Grande, OR 97850
jmfisherman9@gmail.com
541-963-6964

ESTERSON Sarah * ODOE

From: David Mildrexler <d.mildrexler@gmail.com>
Sent: Thursday, August 22, 2019 4:59 PM
To: B2H DPOComments * ODOE
Subject: EOLL comments on B2H Transmission Line Proposal
Attachments: EOLL_B2H_comments_August_2019.docx

To whom it concern,

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

warm regards,

David Mildrexler

David Mildrexler
Systems Ecologist, PhD
Eastern Oregon Legacy Lands
davidm@eorlegacylands.org

August 8, 2019
C/O Kellen Tardaewether
Via B2H.DPOComments@Oregon.gov

Re: Comments on the B2H Power Line

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

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

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

Blue Mountains: Mega-Wildlife Corridor

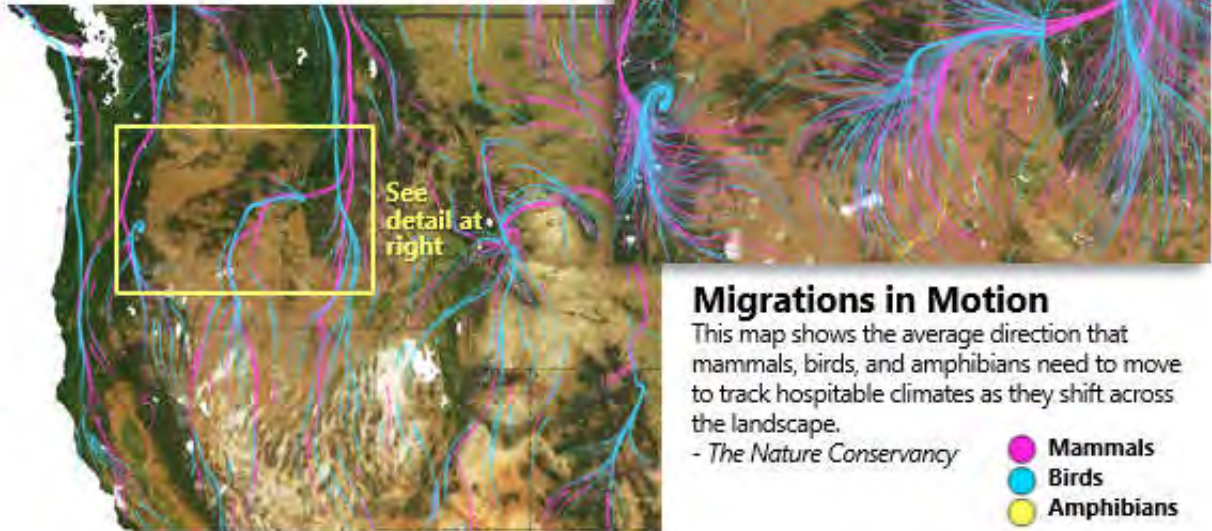


Figure 1. The average direction mammals, birds and amphibians need to move to track hospitable climates as they shift across the landscape of the interior PNW region of Oregon, Washington and Idaho. <http://maps.tnc.org/migrations-in-motion/#7/44.739/-119.680>

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

Respectfully submitted,

David Mildrexler

702 East Greenwood St
Enterprise OR, 978928

August 14, 2019

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

Email: B2H.DPOComments@Oregon.gov

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300’ of Morgan Lake; it covers 27 acres.
Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. In their application, Idaho Power omits any references to Twin Lake.

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

2) b. A specific example of unsupported conclusion:

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

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

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

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

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

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

Annika Miller
Signature

Name: Annika Miller

Mailing Address: 445 SE 9th Drive, Hermiston, OR 97838

August 20, 2019

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

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

Dear Chair Beyeler & Member of the Council


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

Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

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

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

Sincerely,


Dawn Fairburn Miller
601 Spring Ave
La Grande, OR 97850

August 20, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

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

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

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

5.2 La Grande Area Slope Instability

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

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in

not heeding geologists' warnings. In the area down slope from the proposed B2H line lies the Grande Ronde Hospital & multiple Clinics, employing hundreds of people, & is also the critical access hospital for this entire region. La Grande High School & Central Elementary School are also positioned down slope from the proposed towers, as well as are at least 100 residences. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker & Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

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

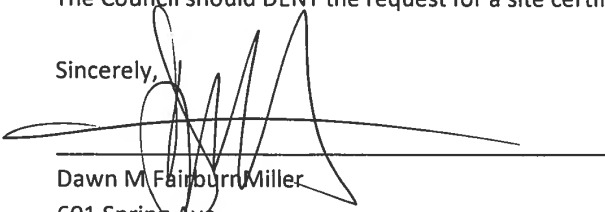
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties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

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

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

The Council should DENY the request for a site certificate.

Sincerely,



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

August 20, 2019

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

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

Dear Chair Beyeler and Members of the Council:

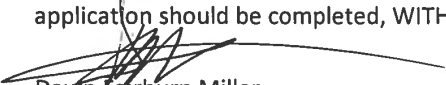
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It is distressing to think that this is only one of many errors in Idaho Power's ASC. If the IPC surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it's disquieting to imagine their difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety. If this slipshod effort is typical of IPC's careful attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake routes, rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty & ill-advised effort to avoid litigation threatened by individuals whose remote properties and summer cabins would have been impacted by the proposed transmission line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the current route proposed.

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



Dawn Fairburn Miller
601 Spring Ave
La Grande, OR 97850

August 19, 2019

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

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

Exhibit K, Attachment K-2, Page 23, Section 7.0
Idaho Power values Oregon's forest lands at an absurdly low amount according to individuals owning forest land in both counties.

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

The applicant failed to address OAR 660-006-0025(5)(a) which does not apply only to forest zoned land currently in production. It addresses FOREST ZONED LAND. The developer is removing the income and opportunity for the landowners and counties to obtain the benefits available through timber production. For example, a large amount of land was burned and is recovering but will become productive timber land. The applicant also limited their assessment of impacts to accepted forest practices to the current use of the land. The requirement under OAR660-006-0025(5)(a) is to assess whether or not the development will cause a significant change or significantly increase the costs of accepted forest practices on forest lands. This developer is stating that they are going to cause a permanent change to the land in their proposed right of way. Accepted forest practices are based upon the impacts in the future when the land is being utilized for growing trees or other uses consistent with the forest zoned lands. Forest uses are defined in Union County Land Use Plan as The (1)production of trees and the processing of forest products (2) open space, buffers from noise, and visual separation of conflicting uses; (3) watershed protection and wildlife and fisheries habitat; (4) soil protection from wind and water, (5) maintenance of clean air and water (6) outdoor recreational activities and related support services and wilderness values compatible with these uses, and (7) grazing land for livestock

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

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

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

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

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

10. There is a loss of wildlife habitat without being mitigated due to a failure to require the developer to provide mitigation for the destruction of forest habitat along the right of way. Requiring mitigation for only the bases of the structures means only a minute amount of the loss will be compensated for. Only allowing the removal of nest sites when birds are not present does not address the fact that many birds such as bald and golden eagles use the same nesting sites year after year and forest landowners usually include wildlife habitat as a reason for maintaining the forest land.
11. Idaho Power states that the value of the forest land removed permanently from production would be further reduced due to the ability of the forest owners to use the transmission line corridor for growing crops or grazing. This statement is unequivocally false. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive. It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for $\frac{1}{4}$ mile (1,320 ft.) of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing $\frac{1}{4}$ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence.

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

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

Costs to the local economy:

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

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

Some facts related to the value of forest land:

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

Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the

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

In other words, this transmission line will remove forested land resulting in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife using the forest lands to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, it will decrease the value of land if it is sold, cause a long-term reduction in assessed value of the land, etc.

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

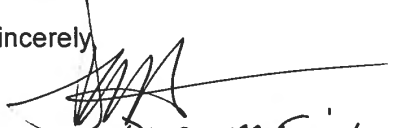
In addition, the applicant has failed to provide documentation to support their comments. The only reference the applicant sites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

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

Sincerely,

Address:


Dawn M Fairbairn Miller
601 Spring Ave
La Grande OR 97850

August 20, 2019

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

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

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." It certainly does not appear extensive, as it is quite inaccurate.

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Following the DEIS, Idaho Power made a hasty & ill-advised effort to avoid litigation threatened by individuals whose remote properties and summer cabins would have been impacted by the proposed transmission line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the current route proposed.

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Jeff Miller
601 Spring Ave
La Grande, OR 97850

August 20, 2019

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

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

Dear Chair Beyeler & Member of the Council

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

Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

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

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

Sincerely,


Jeff Miller
601 Spring Ave
La Grande, OR 97850

August 20, 2019

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

B2H.DPOComments@Oregon.gov

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

Chair Beyeler and Members of the Council:

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

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

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

5.2 La Grande Area Slope Instability

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

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in

not heeding geologists' warnings. In the area down slope from the proposed B2H line lies the Grande Ronde Hospital & multiple Clinics, employing hundreds of people, & is also the critical access hospital for this entire region. La Grande High School & Central Elementary School are also positioned down slope from the proposed towers, as well as are at least 100 residences. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker & Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

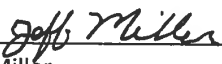
The next significant hazard to our community is wildfire. Oregon is ranked 8th most wildfire prone state in the US, according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure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

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

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

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

Sincerely,



Jeff Miller
601 Spring Ave
La Grande, OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Jennifer Miller
Mailing Address (mandatory) 445 SE 9th Dr
Hermiston OR 97838
Phone Number (optional) (541) 667-2468 Email Address (optional) rutnut@epni.com
Today's Date: 6-26-19 already have
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 22

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

Page 23

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

Page 24

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

Page 25

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

Page 26

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

Page 27

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

Page 28

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

Page 29

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

August 14, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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

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

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

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

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

Thank you,



Jennifer Miller
445 SE 9th Dr. Hermiston OR 97838

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

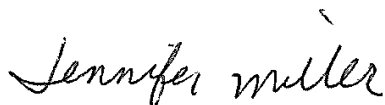
limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's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

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

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

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

Sincerely,



Name Jennifer Miller
Address 445 SE 9th Dr. Hermiston OR 97838

August 2, 2019

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

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.

Jennifer Z Miller Jennifer Miller
Signature Printed Name

Mailing Address: 445 SE 9th Dr. Hermiston OR 97838

ESTERSON Sarah * ODOE

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

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

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON
LC 68

In the Matter of

IDAHO POWER COMPANY

2017 Integrated Resource Plan

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

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

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

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

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

Sincerely,

Jennifer Miller

445 SE 9th Dr.

Hermiston OR 97838

TARDAEWETHER Kellen * ODOE

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

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

Sincerely

Mary E. Miller

3545 Carter St., Baker City, OR 97814

marymillerinbakercity@gmail.com

July 22, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

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

Sincerely,

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

TARDAEWETHER Kellen * ODOE

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

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

Hello,

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

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

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

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

Thank you for reading this.

Mary Anne Miller

ESTERSON Sarah * ODOE

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

August 20, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

Sent Via email: B2H.DPOComments@Oregon.gov

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

RE: Endangered Fish in Ladd Creek and Tributaries, Union County

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

I am writing in protest of the proposed Boardman to Hemingway Transmission Line Project. This project has unacceptable long term impacts.

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

Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue

Mountains, into the Ladd Marsh Wildlife area, connecting with Catherine Creek and the Grande Ronde, Snake, and Columbia Rivers.

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

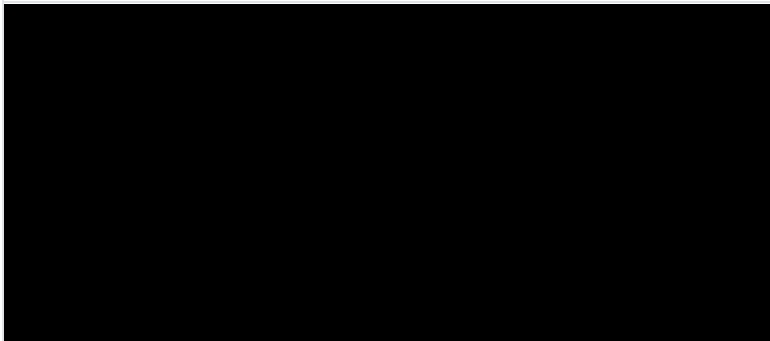
The Oregon Department of Fish and Wildlife's mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state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

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

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see <https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151>).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see [ODOT Works to Improve I-84, Fish Passage in Ladd Canyon](#)). Construction projects have resulted in costs above 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service



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

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

(see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and attached ([PPT]Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species. The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

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

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

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

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

Sincerely,

Sue Miller

62240 Dial Lane

Summerville, OR 97876

subdo2000@yahoo.com

(541) 605-8286

ESTERSON Sarah * ODOE

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

August 20, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

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

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

RE: Anadromous Fish in Ladd Creek, Union County

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

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

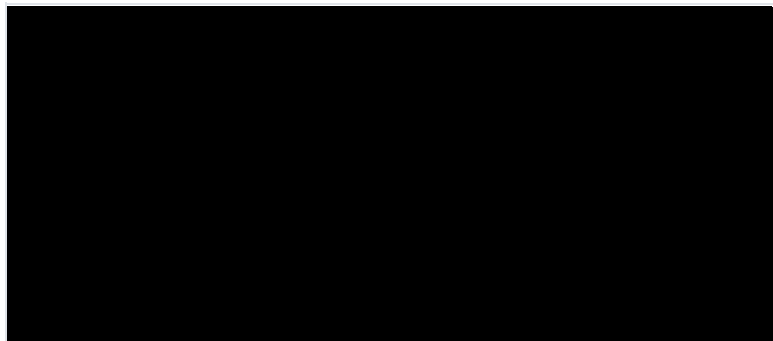
Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue Mountains,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

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

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

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

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



Restoring fish habitat in Ladd Canyon

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

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see [ODOT Works to Improve I-84, Fish Passage in Ladd Canyon](#)). Construction has resulted in costs over 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service



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

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

(see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and ([PPT] Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species (ESA). The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

The B2H Draft Proposed Order contains the following outdated information:

1. In *Table 1. Road-Stream Crossing Ownership, Risk Summaries, Proposed Crossing Types, and Fish Passage Information* Idaho Power names 5 waters in the Ladd Creek area (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*) with stream crossings. The report states that the only fish in these waters are resident fish. This information is now incorrect.
2. The B2H Draft Proposed Order states that for all of Ladd Creek and its tributary streams that “No new ODFW fish plan anticipated.” (page 9-11 of Attachment BB-2). It cannot be overemphasized that this information is now incorrect.
3. The alternative route Idaho Power has chosen will necessitate a 3a/3b (page 11 BB-2) design change for a bridge crossing on Ladd Creek if this route is chosen, this will trigger an ODFW fish

passage plan to be implemented (OAR 17 412-0035) based on Oregon Administrative Rules (OAR) 635-412-0020. Again, the B2H Draft Proposed Order information is now incorrect.

Because of the change of status of the fish population in Ladd Creek, the B2H Draft Proposed Order is out of compliance with several Federal and State laws including:

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

(a) The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality.

(b) The Department shall act to achieve the mitigation goal for Category 2 habitat by recommending or requiring:

(A) Avoidance of impacts through alternatives to the proposed development action; or

(B) Mitigation of impacts, if unavoidable, through reliable in-kind, in-proximity habitat mitigation to achieve no net loss of either pre-development habitat quantity or quality. In addition, a net benefit of habitat quantity or quality must be provided. Progress towards achieving the mitigation goals and standards shall be reported on a schedule agreed to in the mitigation plan performance measures. The fish and wildlife mitigation measures shall be implemented and completed either prior to or concurrent with the development action.

(c) If neither 635-415-0025(2)(b)(A) or (B) can be achieved, the Department shall recommend against or shall not authorize the proposed development action.

In conclusion, the B2H Draft Proposed Order contains an improper evaluation of the potential short and long term negative impacts to the fish habitat in the Ladd Creek drainage, including surrounding creeks, given the fact that species listed as threatened under the Endangered Species Act are now returning to Ladd Creek, with their numbers expected to increase in upcoming months and years.

Sincerely,

Sue Miller

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Summerville, OR 97876

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541.605.8286

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

Page 63

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

Page 65

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

ESTERSON Sarah * ODOE

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

August 18, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

Sent Via email: B2H.DPOComments@Oregon.gov

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

RE: Endangered Fish in Ladd Creek and Tributaries, Union County

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

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

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

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

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

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

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see <https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151>).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see <https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648>). Construction projects have resulted in costs above 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service

(see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and attached ([PPT]Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species. The current

application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

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

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

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

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

Sincerely,

Richard Minogue

64338 Mt. Emily Rd

LaGrande, Or.

97850

richminogue@eoni.com

541-9637903

August 18, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

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

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

RE: Anadromous Fish in Ladd Creek, Union County

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

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

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The B2H Draft Proposed Order contains the following outdated information:

- In *Table 1. Road-Stream Crossing Ownership, Risk Summaries, Proposed Crossing Types, and Fish Passage Information* Idaho Power names 5 waters in the Ladd Creek area (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*) with

stream crossings. The report states that the only fish in these waters are resident fish. This information is now incorrect.

2. The B2H Draft Proposed Order states that for all of Ladd Creek and its tributary streams that “No new ODFW fish plan anticipated.” (page 9-11 of Attachment BB-2). It cannot be overemphasized that this information is now incorrect.

3. The alternative route Idaho Power has chosen will necessitate a 3a/3b (page 11 BB-2) design change for a bridge crossing on Ladd Creek if this route is chosen, this will trigger an ODFW fish passage plan to be implemented (OAR 17 412-0035) based on Oregon Administrative Rules (OAR) 635-412-0020. Again, the B2H Draft Proposed Order information is now incorrect.

Because of the change of status of the fish population in Ladd Creek, the B2H Draft Proposed Order is out of compliance with several Federal and State laws including:

- *ORS 509.580 through 509.910: Fish Passage; Fishways; Screening Devices; Hatcheries Near Dams*
- *OAR 635-41-0005 through 635-412-0040: Fish Passage*
- *Oregon Forest Practice Administrative Rules and Forest Practices Act, OAR Chapter 629 (ODF 2014)*
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 - The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality.

(b) The Department shall act to achieve the mitigation goal for Category 2 habitat by recommending or requiring:

- (A) Avoidance of impacts through alternatives to the proposed development action; or
- (B) Mitigation of impacts, if unavoidable, through reliable in-kind, in-proximity habitat mitigation to achieve no net loss of either pre-development habitat quantity or quality. In addition, a net benefit of habitat quantity or quality must be provided. Progress towards achieving the mitigation goals and standards shall be reported on a schedule agreed to in the mitigation plan performance measures. The fish and wildlife mitigation measures shall be implemented and completed either prior to or concurrent with the development action.

(c) If neither 635-415-0025(2)(b)(A) or (B) can be achieved, the Department shall recommend against or shall not authorize the proposed development action.

In conclusion, the B2H Draft Proposed Order contains an improper evaluation of the potential short and long term negative impacts to the fish habitat in the Ladd Creek drainage, including surrounding creeks, given the fact that species listed as threatened under the Endangered Species Act are now returning to Ladd Creek, with their numbers expected to increase in upcoming months and years.

Sincerely,

Richard Minogue

64338 Mt. Emily Rd.

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97850

seeminogue@gmail.com

541-9637903

ESTERSON Sarah * ODOE

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

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

August 21, 2019

B2H.DPOComments@Oregon.gov

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,

Judy Mittenhafer, Manager
TJL Ranch LLC

Name: **TJL Ranch LLC**

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

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

August 21, 2019

SETBACKS FROM RAPTOR NEST SITES

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

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

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

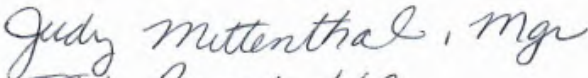
According to USFWS 501 FW 2, Appendix 2, the following information is necessary in order to determine habitat category determinations.

(2) "Identify those special biological features or the area(s) in question that are considered pertinent to the resource category determination (i.e. species, species life stages, species life requisites, species groups and species diversity considerations). Also identify any special vegetative and physical site conditions that enter into consideration."

(3) "In quantitative or qualitative terms, discuss the importance ascribed to the special features and conditions in number 2 above."

(4) "As appropriate, discuss considerations for scarcity, abundance, irreplaceability, and/or uniqueness. Also discuss the geographic area of consideration associated with these characteristics."

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


TJL Ranch LLC

Signature

Name: TJL Ranch LLC

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

August 21, 2019

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

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,

Judy Mittenenthal, Mgr
TJL Ranch LLC

Name: TJL Ranch LLC

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

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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: *Bill Monda*
Mailing Address: *905 LAKE AVE*

1617 Z Ave
La Grande OR 97850

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

97301-374299



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AUG 19 2019
DEPARTMENT OF ENERGY

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 94/4 on unstable and steep slopes**

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

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

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

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

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

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

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

Table C1: Summary of Proposed Borings; Map Sheet 35

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

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

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

Idaho Power Corporation, in Exhibit H 2.2.4 states *"The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard."*

Idaho Power Corporation admits in ASC page B-12 that *"The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes presenting design and construction challenges."*


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

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

The area surrounding the drill site **94/4** is within a mile of a heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

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


Name: Jennifer Moore
Address: 1610 Z Ave La Grande,

References

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

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

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

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

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

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

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

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

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

August 5, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

Sincerely,


Signature

Printed Name: Megan Moone
Mailing Address: 2304 Cove Ave.
La Grande, OR 97850

ESTERSON Sarah * ODOE

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

August 18, 2019

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

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

Dear Chair Beyeler and Members of of the Council,

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

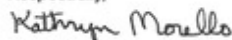
Division 25 SITE CERTIFICATE CONDITIONS 469.503 line 12.

The seismic events resulting from blasting and use of heavy equipment to install the towers
are of major concern. How will Idaho Power mitigate the breach of the earthen dam, due to
nearby blasting? The torrent of water and debris will find its way to Deal Canyon (West side of
La Grande, Oregon) and wash out the homes in its path. The loss of homes and lives should
be considered before going forward with this project! The blasting and movement of heavy
equipment to build the roads needed and the blasting to be used in the construction of the
tower base could be enough to trigger a flood. Idaho Power Transmission Line "(12) The
certificate holder shall design, engineer and construct the facility to avoid dangers to human
safety and the environment presented by seismic hazards affecting the site that are expected
to result from all maximum probable seismic events. As used in this rule "seismic hazard"
includes ground shaking, ground failure, landslide, liquefaction triggering and consequences
including flow failure, settlement buoyancy, and lateral spreading, cyclic softening of clays and
silts, fault rupture, directivity effects and soil-structure interaction. For coastal sites, this also
includes tsunami hazards and seismically-induced coastal subsidence."

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

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

Respectfully,


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

cdvrela@eoni.com

541-786-7224

August 18, 2019

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

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AUG 23 2019

DEPARTMENT OF ENERGY

B2H.DPOCOMMENTS@Oregon.gov

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

Dear Chair Beyeler and Members of of the Council,

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

Division 25 SITE CERTIFICATE CONDITIONS 469.503 line 12.

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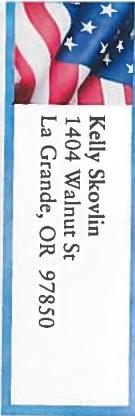
Respectfully,

Kathryn Morello

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

cndyrela@eoni.com

541-786-7224



RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

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

August 14, 2019

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

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

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

To: Chairmen Beyeler and Members of the Council

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

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

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

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

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

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

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

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

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

Thank you,



Signature

Printed Name:

DEE MORRIS

Mailing Address:

P.O. BOX 449 UNION, Ore 97883

Email:

DeeandVickie@yahoo.com

LIFE LONG RESIDENT!



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Carl + Julie Morton
Mailing Address (mandatory) 1248 Klamath Ave. Nusse, OR
2185 Rock Springs Cyn. Rd. Nusse, OR.
Phone Number (optional) (208) 740-8249 Email Address (optional) _____

Today's Date: 6/18/19

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

Written comments can also be submitted today.

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

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

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

Written Testimony

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

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

Page 66

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

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

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

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

Page 67

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

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

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

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

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

25 MR. ARNOLD TROPF: Could I make one more

Page 68

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

3 HEARING OFFICER WEBSTER: So come back up.

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

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

11 MR. ARNOLD TROPF: Arnold Tropf.

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

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

Page 69

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

3 HEARING OFFICER WEBSTER: Thank you.

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

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

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

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

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

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

Page 70

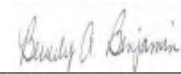
1 You know, we're very concerned. It's not a big issue to
2 take that thing and go out on public ground, which is
3 within 2 or 3 miles. There's another access route.
4 The canal system that's right there, the
5 irrigation systems that Mr. Chamberlin and Mr. Horton
6 were speaking about, they are on fragile ground. It's
7 over 80 years old. And you guys start traveling and
8 pounding the ground there, it's fragile rock, it's going
9 to tear that system up, which is the lifeblood of this
10 valley.
11 So what you guys need to do is stop and visit
12 and really go out and get hands-on where this is going.
13 Also, I don't think you've actually done any studies on
14 archeology sites. I've been at one of these meetings
15 and spoke to someone, I'm pretty sure they don't really
16 know where they're at. And there is areas there that
17 have Indian artifacts there.
18 So I don't think that everything is being done
19 by looking at where you're going with this. And we need
20 to just stop and take a minute and get it right.
21 Because we don't need it in our backyards. We don't
22 need it in our front yard or right out our window. So
23 just please be considerate of where you're going and
24 what you're doing with it.
25 And not only that, but you're taking value out

Page 71

1 of our property. We purchased these grounds to keep
2 them and help supply the food chain of the United States
3 and our local government and the county. Even though
4 we're just a small drop in the bucket, we're still here.
5 So please don't take the value out of our ground.
6 Thank you.
7 HEARING OFFICER WEBSTER: Thank you.
8 Is there anybody on the phone at this point?
9 IT PERSON: No.
10 HEARING OFFICER WEBSTER: And what we'll do
11 now is we will recess. I have 6:33, so we will be here
12 for another hour and a half or so, and we'll reconvene
13 if somebody wants to give comment.
14 Thank you.
15 Feel free to mill about and enjoy the snacks
16 in the meantime.
17 (Hearing recessed at 6:33 p.m.)
18
19
20
21
22
23
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 25th day of June 2019.
16
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BEVERLY A. BENJAMIN, CSR 710
Notary Public
P.O. Box 2636
Boise, Idaho 83701-2636

August 18, 2019

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

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

Dear Chair Beyeler and Members of the Council:

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

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

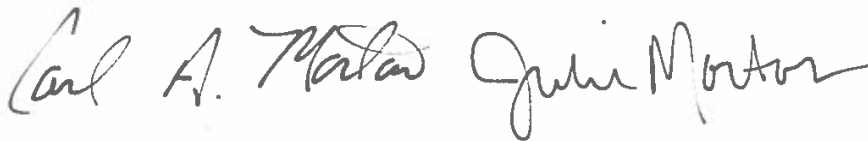
- A. Technical and engineering feasibility
- B. The proposed facility is dependent on location
- C. Lack of available urban and non-resource lands.
- D. Availability of existing rights of way
- E. Public health and safety
- F. Other requirements of state or federal agencies

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

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

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

Sincerely,

Handwritten signatures of Carl A. Morton and Julie Morton in cursive ink.

Carl & Julie Morton
1248 Klamath Ave
Nyssa, OR 97913
Email: cnjmorton@centurylink.net; Phone: (home): 541-372-2860 (cell): 208-740-0249

SPT 30

2002 Resource mgmt plan Vale District

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

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

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

Roads may have a major impact on a multitude of physical and biological processes, as indicated in the "Scientific Assessment for the Draft Eastside EIS" (Quigley and Arbelvide 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

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

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

Monitoring: Normal BLM accomplishments and plan implementation tracking process.

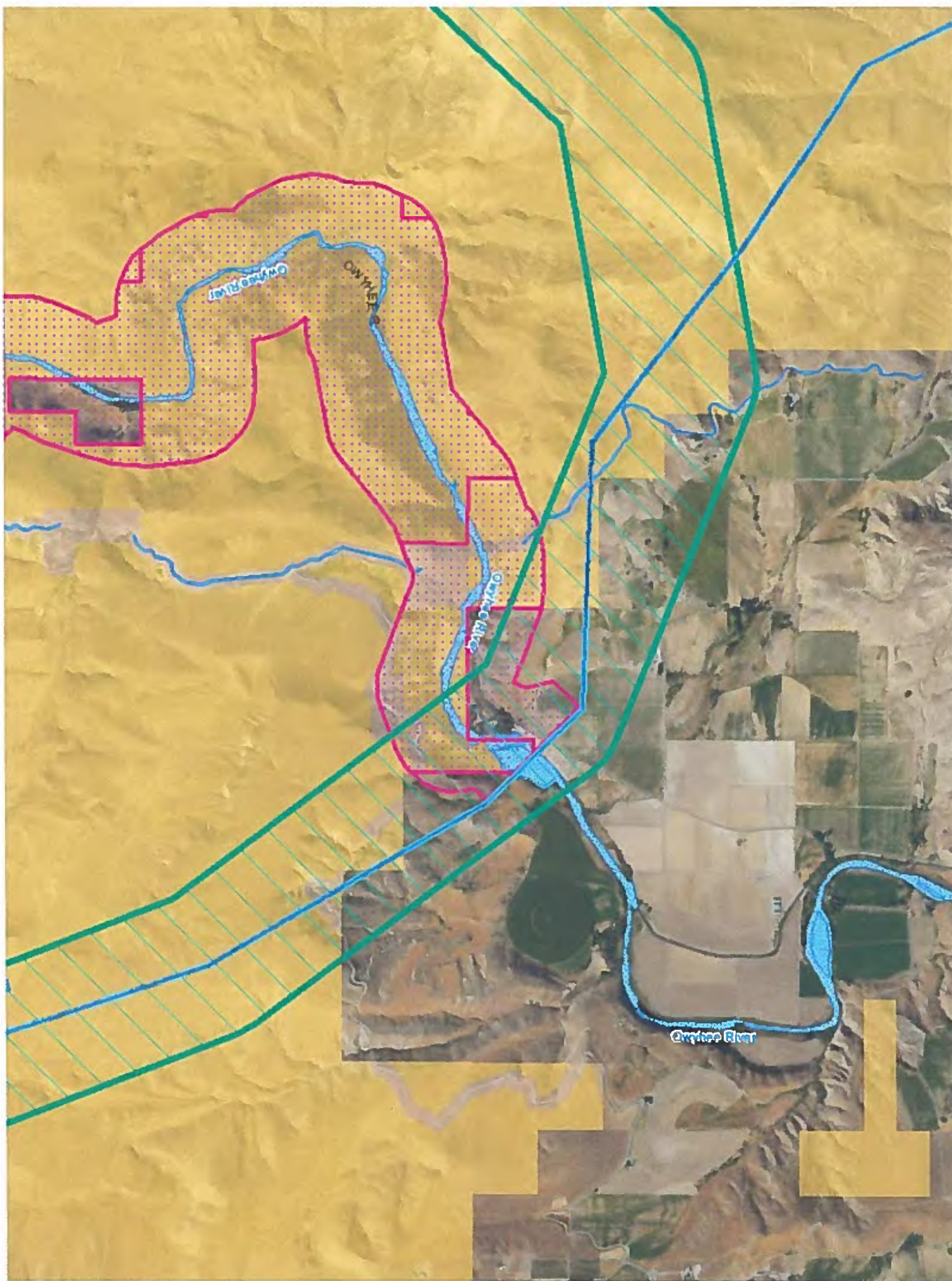
Management Actions: 1) Designate new utility corridors and continue or discontinue the designation of existing corridors for trans-district electric transmission lines identified by the Western Regional Corridor Study (WRCS), Federal and State highways, county or BLM roads, and railroads (see Appendix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

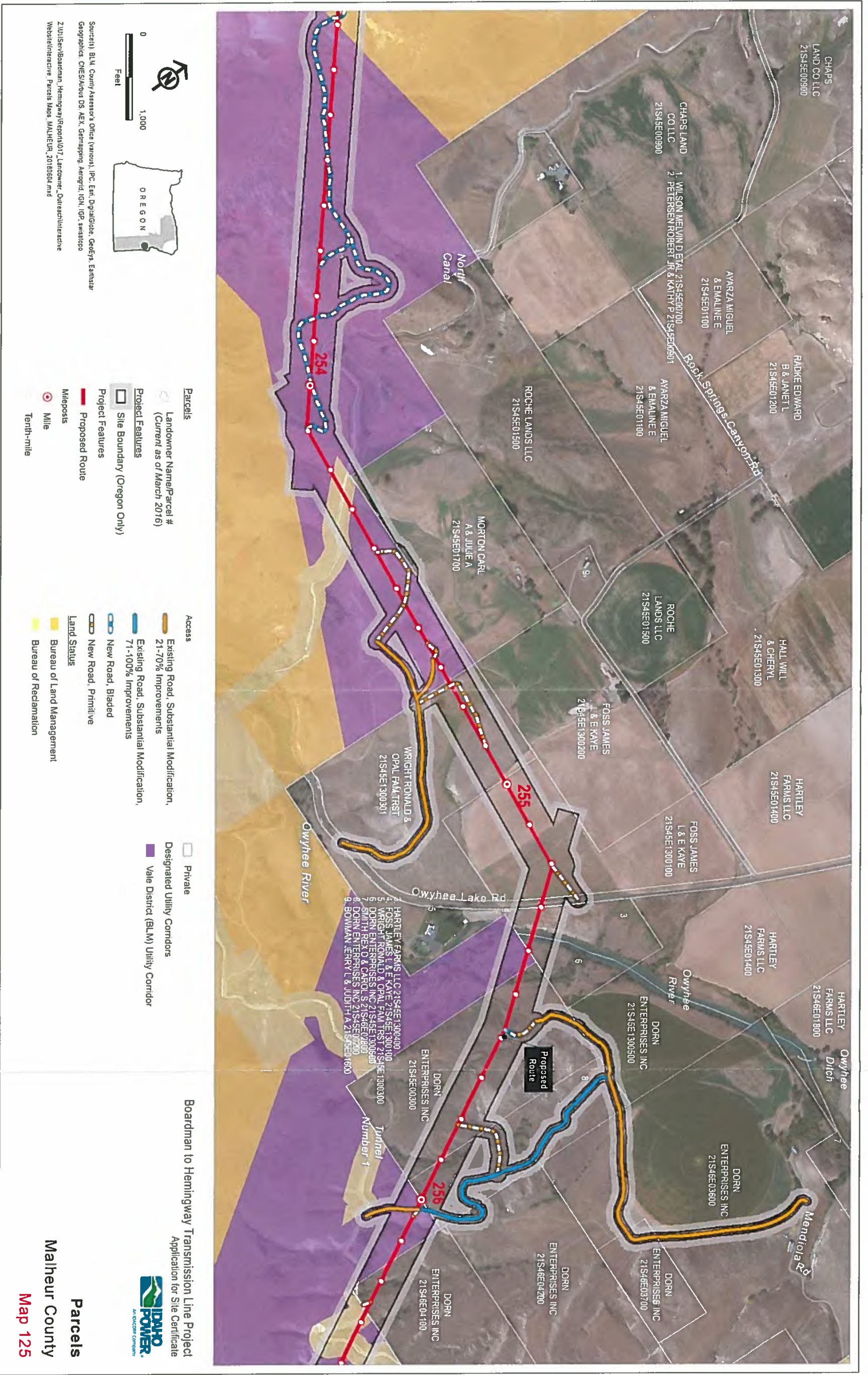
Because of prior decisions and commitments made in the MFP, OWFEIS, and the WRCS, the location of PP&L 500-kV existing route below the Owyhee Dam will remain the same. The MFP recommends a route which avoided the area of the dam by detouring to the north (see Map LAND-1). However, prior to the signing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

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

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

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





TARDAEWETHER Kellen * ODOE

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

Dear Chair Beyeler and Members of the Council,

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

Ed Mosiman
1710 2nd Street
La Grande, OR 97850
emosiman@gmail.com



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) David Moyal

Mailing Address (mandatory) 1804 2nd
La Grande OR 97850

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

Today's Date: 6/20/19

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

Written comments can also be submitted today.

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

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

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.)

6/20/19
Energy Facilities Siting Council
c/o Kellen Tardaewether, Sr. Siting Analyst
Oregon DOE
550 Capitol St. NE
Salem, OR 97301

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

Dear Chair Beyeler and Members of the Council:

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

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

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

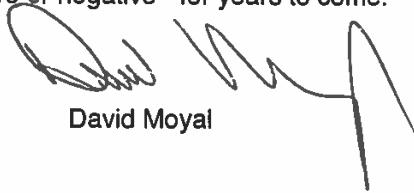
The application goes on to describe several appendices to the County Plan, but finds also that none of them will be impacted by the project.

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

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

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

Sincerely,

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

David Moyal

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

Page 30

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

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

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

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

Page 31

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

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

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

12 UNIDENTIFIED SPEAKER: Mr. Barnes is not here.
13 HEARING OFFICER WEBSTER: Well, then we are
14 going to skip Mr. Barnes and we will hear from JoAnne
15 Marlette after --

16 MR. MOYAL: David Moyal.
17 HEARING OFFICER WEBSTER: Yes, your turn, and
18 then Ms. Marlette.

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

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

Page 32

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

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

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

15 MR. MOYAL: Closer still? Is this okay?
16 HEARING OFFICER WEBSTER: Yes.

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

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

Page 33

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

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

11 The logic behind this dismissal of scenic
12 resources impact is flawed. The County, in defining
13 specific areas of concern, couldn't possibly in the
14 1970s have anticipated every possible project that might
15 deleteriously affect County viewshed, hence the general
16 mission statement of the plan, which I quoted earlier,
17 needs to be addressed in the application before
18 conclusions regarding scenic values can be reached.

19 I'll go off topic a little bit. I would like
20 to point out the injustice in the exclusion of the City
21 of La Grande from permitting and siting process. More
22 than any other municipality we are impacted by this
23 project, yet because it lies immediately outside our
24 city limits we are excluded beyond the City Council
25 proclamation opposing the project from the

Page 34

1 decision-making process.
2 Please remember as you reach your decision,
3 that you'll be gone tomorrow, but we'll be living with
4 the effects of your decision, positive or negative, for
5 years to come. Thank you very much.
6 HEARING OFFICER WEBSTER: Thank you.
7 Following Ms. Marlette we will be hearing from
8 Virginia Mammen.
9 Good evening.
10 MS. MARLETTE: Hi. Thank you for allowing us
11 to speak to you this evening. I am JoAnne Marlette,
12 2031 Court Street, Baker City, Oregon. You will
13 probably hear pretty much what I said last night.
14 As you are all well aware, Oregon has an
15 existing utility corridor which was set in place during
16 the administration of Governor Tom McCall. I knew Tom
17 McCall; as a matter of fact, I typed the first draft of
18 his mother, Dorothy Lawson McCall's, book, "Ranch Under
19 the Rimrock."
20 It was his love of this ranchland in Central
21 Oregon that led him to his commitment to preserve farm
22 and forestland. And in the early 1970s, as governor, he
23 signed Senate Bill 100, which created a statewide land
24 use regulatory system aimed at preserving farm and
25 forestland.

Page 35

1 Knowing how important preserving farm and
2 forestland would be, a utility corridor was set from
3 Boardman, Oregon, to the Idaho border, so that issues
4 such as what we are having right now would not exist.
5 All utilities would have their own corridor and would
6 not encroach on farm and forestland in other parts of
7 the state. Idaho Power has consistently claimed using
8 our existing utility corridor would cost too much money.
9 From what I could find, it appears to me that
10 Idaho Power is not going through our public lands
11 because the environmentalists would be after them like
12 stink on a dog, perhaps even suing Idaho Power for all
13 the reasons we are objecting to it coming through our
14 private property here in northeastern Oregon. I'm sure
15 they don't want to spend tons of their money defending
16 this B2H proposed project through our public lands with
17 impending threats of lawsuits at their every turn.
18 Also, I find quite a discrepancy as to need.
19 My research shows the market is not growing. Idaho
20 Power's billed sales for the last 10 years have been
21 essentially flat, if not declining. That is supported
22 by reports from the US government and Idaho Power's own
23 data.
24 And I will be providing further written
25 comment prior to the July 23rd deadline. Thank you so

Page 36

1 much.
2 HEARING OFFICER WEBSTER: Thank you.
3 Following Ms. Mammen, we will be hearing from
4 Adrian Henderson.
5 SECRETARY CORNETT: Because we are recording
6 it and we have people on the phone, if everybody could
7 speak into the mic, it will be much more helpful for us
8 and those on the phone.
9 MS. VIRGINIA MAMMEN: I'm Virginia Mammen. I
10 live at 405 Balsa here in La Grande. I have lived on
11 Balsa, off Modelaire/Hawthorne Loop for 50 years, and I
12 love and appreciate the area in which I live. Through
13 those years I have learned to appreciate the area in
14 which I live. Although, I have learned that the land
15 around me, not only under my house, but far up into the
16 hills above me are to be respected as much as my
17 neighbors are to be respected.
18 During that time I have also learned that
19 although I have taken good care of my body, age and time
20 demand that I not push it any farther than necessary or
21 it will break down in one place or another.
22 So too the hills west above my house. As I
23 have watched this land creak and grown with the seasons,
24 it has been plagued with fire, drought, and flooding. I
25 have learned it is to be respected as a living being and

Page 37

1 should not be pushed. In 2010, this area was determined
2 to be a hazard area and unstable. It moves and shifts
3 with the nudges from Mother Nature making appearances
4 down below my house with cracks and other minor
5 nuisances.
6 I don't see any respect for our hills or me or
7 my neighbors if B2H comes into our area, which is rated
8 "high" or "very high" as a landslide area, while not
9 just to give our hills an occasional push, but to slam
10 them with dynamite, create massive holes, introduce
11 excessively heavy weight and strip them of their beauty,
12 pride, and spirit while opening the opportunity for
13 causing the changing of the underground water paths and
14 land stability and introducing possible new elements for
15 fire hazard. Any one of these could create catastrophic
16 danger to the formerly quiet neighborhood below that I
17 have enjoyed for 50 years.
18 The disturbance of a soil and track-out would
19 pollute the clean area which we cherish. Then there is
20 the noise pollution from both construction and completed
21 project. To me this is not progress in the making but a
22 total lack of respect and appreciation for both people
23 and the land.
24 I would invite you to come walk my
25 neighborhood with me, on the streets meant not for

6/20/19
Energy Facilities Siting Council
c/o Kellen Tardaewether, Sr. Siting Analyst
Oregon DOE
550 Capitol St. NE
Salem, OR 97301

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

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

Sincerely,

David Moyal

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

Page 138

1 to your home. Microgrids would be nice. Instead the
2 trouble is we are locating wind farms such as the one in
3 the once naturally scenic Pyles Canyon south of
4 La Grande, the wind farms and once beautiful Columbia
5 River Gorge, and the wind farm in the once scenic Burnt
6 River Canyon on the way to Boise.
7 These unreliable sources of energy are far
8 from your home and the load they serve. These energy
9 sources load the power lines and increase power line
10 losses. This unnecessary transport of very unreliable
11 power has created the need for more ability to transport
12 power.
13 Idaho Power, PacifiCorp, and Bonneville Power
14 Administration are responding to the requirements that
15 power be maintained to your house whether or not the
16 wind is blowing, and they are keeping this power system
17 together whether or not the wind is blowing.
18 A big item in our lives is electric cars.
19 Transportation accounts for a huge part of our national
20 energy usage. We want to be able to provide energy for
21 electric cars. Electric cars hog a lot of electric
22 power. That will require nearly double the electric
23 output of our power system. Let's don't stall electric
24 cars because of stalling a power line.
25 Please don't pass the mess of a weak

Page 139

1 infrastructure of our power system to our children and
2 all the people in the Northwest. Let's allow Idaho
3 Power Company, PacifiCorp, and Bonneville Power
4 Administration to drive without their brakes on. Let's
5 allow Idaho Power Company, PacifiCorp, and BPA to heat
6 their house with the windows closed.
7 If we want to have unreliable energy sources
8 such as the wind farms located far from where the
9 electric load is, let's provide the power lines to carry
10 the load and maintain system stability. If we want to
11 provide for a huge electrical energy increase to support
12 electric vehicles, then Idaho Power Company, PacifiCorp,
13 and BPA have the power lines they need to handle the
14 load.
15 I understand your feelings about where to put
16 the line. Let's not allow our power system to become an
17 obsolete mess for our children. Let's figure out the
18 best place to locate B2H. Please make some siting
19 suggestions to the Commission and to Idaho Power
20 Company.
21 Thank you.
22 HEARING OFFICER WEBSTER: Thank you.
23 MR. ROD MUILENBURG: My name is Rod
24 Muilenburg. I reside at 412 16th Street, La Grande,
25 Oregon.

Page 140

1 From what I am understanding this form
2 provided by Idaho Power, the long and short, from what I
3 understand, Oregon is supposed to take one for the team
4 for the sake of Idaho. That makes me wonder. What is
5 it about the Idaho infrastructure and Idaho's power grid
6 that determines the demand from Oregon? It also makes
7 me wonder, why is it that you insist it be in our
8 backyard and not in your backyard?
9 I've been here my whole life. I remember the
10 fire of '73. I remember how hard people worked to save
11 their houses. I remember the sun disappearing, and I
12 remember a tinder box ready to go. And you want to go
13 with an overhead power system that the world doesn't
14 even recognize anymore. The world puts power grids
15 underground today. It's the future. It's how we do it.
16 You are taxing a system that doesn't have to be taxed.
17 These lines, they inevitably are overtaxed, and they
18 droop, they hang, and they cause fires. And as I said,
19 we've have got a tinder box surrounding us.
20 I don't know if we want to go through the
21 inevitable again of having another fire. I don't know
22 if we want to suffer the inevitable outcome that
23 happened to Paradise, California, when they had only
24 time enough to grab their purse and wallet and the
25 shirts on their backs before their house was rendered to

Page 141

1 a mere foundation and a fireplace and the rest is a
2 toxic waste element. Do we want to go through that?
3 And then I heard only yesterday that a diamond
4 factory in Washington is going to demand enough voltage
5 to supply 10,000 people to manufacture synthetic
6 diamonds. I don't know when this ends.
7 But I've listened to all these people behind
8 me talking about the eyesore we are going to see,
9 talking about the impact. And they are mentioning
10 things I haven't even considered; hearing problems,
11 sound transmission lines. There's a whole lot involved
12 that we have just barely touched the tip of the iceberg.
13 And is it a requirement that Idaho have its power in the
14 first place?
15 I don't know, I am just thinking we have got a
16 lot of small cities, too, with the prevailing winds
17 around this area, Ukiah, and all these little cities
18 surrounding here, and how bad will it be? Is there
19 enough fire suppression? Is there enough accountability
20 for the environmental impact?
21 I don't think anybody here has weighed this
22 whole thing out until they attended this forum tonight.
23 Which, by the way, I appreciate you putting it on. I
24 appreciate you being here. I appreciate Idaho Power for
25 allowing us to voice our opinions.

Page 142

1 But historically, like I said, the Oregon
2 Trail, we have to consider it. We have got the
3 procurement of land, and apparently no letters were
4 offered for the initial route before anybody had a
5 chance to respond. And now this new thing comes in and
6 we all get a surprise.
7 I think a lot of people have a lot more to say
8 about this than me; so I'm just going to yield back my
9 time.
10 HEARING OFFICER WEBSTER: Thank you.
11 Following Irwin Smutz, we have Jeri Watson,
12 and then I don't know if Idaho Power wants to -- okay.
13 So then we will hear from Idaho Power after that.
14 MR. IRWIN SMUTZ: My name is Irwin Smutz, and
15 I live at 59074 Foothill Road. My ranch borders the
16 game refuge. I have got two oil lines, two gas lines,
17 and two fiberoptic lines, and the power line that, I
18 think your alternative route, I think the preferred
19 route is going to be just above that power line.
20 I have two concerns: One of them is the fire
21 danger. That present power line set a fire a few years
22 ago close to Ladd Canyon. The people that ran the power
23 line, a long distance line, failed to keep the brush cut
24 underneath the line, and the tree grew up and that line
25 arced and started a fire.

Page 143

1 Also, in the site, the area where they are
2 going to put the proposed power lines through that you
3 are talking about is in an unstable area. My dad went
4 up and checked the cows when I was a boy, and he got up
5 to this real steep unstable area, and the ground had
6 shifted because of another line that came through, an
7 oil line, it shifted, and this pipe came out, out of the
8 ground 5 or 6 feet in the air and made a bend.
9 Fortunately, it did not break, or oil or gas or whatever
10 they put through that, would have ran down the hill.
11 Well, this proposed power line is going
12 through that area where that shift was. They cut
13 through shale type ground, and they kind of loosened the
14 thing up. So that's a thing that really kind of
15 concerns me. Of course, we have a lot of game of all
16 kinds, we border the game refuge.
17 But I would just like to share that this is
18 one problem that you would have. The building site
19 where all my buildings are on the ranch there are down,
20 of course, at the bottom of the hill, and I guess the
21 building site where my buildings are slid off the top of
22 the mountain some time in prehistoric history. And the
23 geologist out there told Dad, I guess the rest of it
24 will stay up there. But that line is going to be going
25 right across that unstable land.

Page 144

1 And also it was kind of hinted at by another
2 speaker, where the hospital is, that is really unstable,
3 too. They had to put in a huge amount of cement to try
4 to keep that thing from shifting, the new building that
5 they put there at the hospital.
6 The site that my house is on is also shifting.
7 I have a board fence and they have all pulled away from,
8 in places they have pulled away from the posts because
9 the building site is going down the hill. Well, that is
10 a thing that you are dealing with on the power line
11 going through that area.
12 So I just really appreciate you listening to
13 me, but I am concerned. These people have serious
14 concerns, it makes a really big difference. You can put
15 these things through and they'll pay so much a foot to
16 go through and then you put up with it for the rest of
17 your life.
18 Just an example, I went to put some fence
19 across all those pipe lines, and somebody came out and
20 told me I was not allowed to put any steel posts in the
21 fence going across that because some of the, I guess the
22 fiber optic lines or something were only underneath the
23 line about 4 inches they said.
24 So I really appreciate you folks listening.
25 And I just wanted to share that with you. I have had

Page 145

1 quite a bit of experience on things coming through my
2 land, and it does have everlasting consequences once
3 these things go through.
4 Thank you very much.
5 HEARING OFFICER WEBSTER: All right. Jeri
6 Watson.
7 MS. JERI WATSON: Hello. Long day. I really
8 appreciate you all being here. And I'm Jeri Watson,
9 J-e-r-i, W-a-t-s-o-n, and I live at 1906 Foley Street in
10 La Grande.
11 I've been here for about 40-some years. And I
12 moved here, I came from a city in California called
13 Torrance, and I moved here to teach school, knowing that
14 I wouldn't make the kind of salary here that I would
15 make in places that I was capable of going. I'm not
16 trying to be modest, but I'll just give you an idea of
17 my qualifications. I could teach, I'm certified in
18 special ed, high school, elementary school, I speak
19 three languages; one being Spanish. The others are
20 Japanese and obviously English. I was at the top of my
21 class at University of Southern California, and I really
22 could have gone anywhere if money was important to me.
23 Enough money to get by is important.
24 But my folks didn't want me to come here.
25 They said, You can't eat the scenery. But I live every

R2HAPPDoc8-121 DPO Public Comment Mvers 1



Oregon Department of Energy and the Energy Facility Siting Council

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

Name (mandatory) Jerry Myers
Mailing Address (mandatory) ~~629~~ 68477 Little Button Cr Rd
Heppner OR 97836
Phone Number (optional) 541-376-8322 Email Address (optional) _____

Today's Date: 6/27/19

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

Written comments can also be submitted today.

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

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

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

<p style="text-align: right;">Page 90</p> <p>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</p>	<p style="text-align: right;">Page 92</p> <p>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</p>
<p style="text-align: right;">Page 91</p> <p>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.</p>	<p style="text-align: right;">Page 93</p> <p>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>

TARDAEWETHER Kellen * ODOE

From: Sam Myers <smyers@eoni.com>
Sent: Sunday, June 23, 2019 5:19 PM
To: B2H DPOComments * ODOE
Subject: b2h, ODE SITTING COUNCIL(1)
Attachments: b2h, ODE SITTING COUNCIL(1).pdf

b2h, ODE SITTING COUNCIL(1)


Sent from my iPad

Sam Myers

68453 little Butter Creek Rd.
Heppner, Or. 97836
Sam.myers84@gmail.com

June 23, 2019

Energy Facilities
c/o Kellen Tardaewether, Senior siting Analyst
Oregon Department Of Energy
550 Capital St. N.E.
Salem, OR. 97301

Via EMAIL: B2H.DPOCComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

As an operator of a Century Oregon Farm directly impacted by the proposed transmission line. I am opposing this project because of the extreme fire danger it places on the livelihood of our entire operation. Our dry-land farming cropping system operates near the eastern edge of Morrow County and has been successfully producing wheat for many decades; a fire would be a catastrophic event that would reduce our ability to stay in operation.

The climate of our farm is such that we see many low Relative Humidity months and frequent "Red Flag" warnings are placed over our area in the summer. This is a huge problem for us. I believe we are being placed under an undue amount of danger from fire; specifically from the higher voltages proposed for this transmission line!

The soils that support our crops do not recover quickly from fires that occur during the pre-harvest fully mature stage of our crops, during this stage there is a very high fuel load created by the crop itself. A fire during this stage of the cropping cycle will devastate the soil for many years!

I do not believe that a "Right of Way" should be able to take away a person's livelihood! A very small fire occurred on a neighboring field some 6 years ago, I was able to fight that fire myself along with other responders, it was a post harvest fire most likely caused by a motorist's cigarette, this fire had repercussions for 2 cropping cycles, some 4 years later a reduced yield was reported to me by the farm's owner.

Please so do not allow this proposed transmission line to be placed over our farm.

Sincerely
Sam Myers

I do not believe this is acceptable risk we should suffer!
This "Right of Way" could take away our ability to financially survive!
Urna Semper

TARDAEWETHER Kellen * ODOE

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Sent: Sunday, June 23, 2019 4:58 PM
To: B2H DPOComments * ODOE
Subject: b2h, ODE SITTING COUNCIL.pdf
Attachments: b2h, ODE SITTING COUNCIL.pdf

Sent from my iPad

Sam Myers

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June 23, 2019

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Urna Semper



Oregon Department of Energy and the Energy Facility Siting Council

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June 18-20 and June 26-27, 2019, 4:30-8 p.m.
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Mailing Address (mandatory) 68453 Little Bottom Cr. Rd
Heppner, OR 97836
Phone Number (optional) () _____ Email Address (optional) SAM.MYERS@con1.com

Today's Date: 6/27/19

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

Written comments can also be submitted today.

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

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

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 22</p> <p>1 intention at this time and we'll circle back to you and 2 give you the opportunity. 3 I don't hear anybody on the line. 4 So I will call up the people with the cards 5 that I have here. But before I do that, I have at this 6 point four comment cards. I expect that some more will 7 trickle in. Because we have allotted several hours or a 8 few hours for this, I will not put any time constraints 9 on anybody this evening. But I do ask that you be 10 succinct in your comments. And as Kellen had indicated, 11 keep them -- the more effective the better for us. 12 Any requests that are made to EFSC will be 13 brought up at the conclusion of the public testimony 14 opportunity of the hearing. 15 Today's hearing, as well as all of the public 16 hearings on the Boardman to Hemingway draft proposed 17 order, are being documented by a certified court 18 reporter, and there will be transcripts of the testimony 19 made available after completion of the public hearings. 20 We are also recording the hearing tonight. 21 The presentations, written comments and oral 22 testimony are part of the decision record for the 23 proposed facility. 24 And then for the legalese. Pursuant to OAR 25 345-015-0220(5)(a) and (b), please note the following:</p>	<p style="text-align: right;">Page 24</p> <p>1 of the hearing. I will ask that when I call the speaker 2 up, the first thing you do is provide your name and 3 spelling and your address for the record, so that the 4 court reporter can have that information. 5 And the first person coming up to give 6 testimony is going to be Sam Myers. Mr. Myers. 7 MR. SAM MYERS: My name is Sam Myers. S-a-m, 8 last name M-y-e-r-s. Our address is 68453 Little Butter 9 Creek Road, Heppner, Oregon. 10 Thank you for allowing me to be here. Again, 11 my name is Sam Myers. I operate a family-owned dryland 12 wheat farm on the eastern edge of Morrow County. I am 13 here with my father, Jerry Myers, who is in agreement 14 with the comments that I'm about to make. 15 If I could, so I understand fully, when I'm 16 opposed to the project, do I call it the order or the 17 proposed order? Does it make a difference? 18 HEARING OFFICER WEBSTER: It doesn't really 19 make a difference. If you have concerns about -- you 20 would have concerns about the draft proposed order or 21 parts of the application. So either one of those two 22 would be where you would be addressing your concerns. 23 MR. SAM MYERS: My argument against the 24 proposed order has to do with and relates to the issues 25 regarding a fire. My arguments do not have to do</p>
<p style="text-align: right;">Page 23</p> <p>1 A person who intends to raise any issue that may be the 2 basis for a contested case must raise the issue in 3 person at the public hearing or in a written comment 4 submitted to the Department of Energy before the 5 deadline, which we just indicated has been extended to 6 August 22. 7 A person who intends to raise any issue that 8 may be the basis for a contested case must raise the 9 issue with sufficient specificity to afford the Council, 10 the Department, and the applicant an adequate 11 opportunity to respond, including a statement of facts 12 that support the person's position on the issue. 13 To raise an issue in a contested case 14 proceeding, the issue must be: Within the Council's 15 jurisdiction; raised in writing or in person prior to 16 the close of the hearing record comment period, which 17 is, as we have now said several times, is August 22, 18 2019; raised with sufficient specificity to afford 19 Council, the Department of Energy, and the applicant an 20 adequate opportunity to respond. 21 And as we have stated previously, to raise an 22 issue with sufficient specificity, the person must 23 present facts that support the person's position on the 24 issue. 25 We will now begin the public testimony portion</p>	<p style="text-align: right;">Page 25</p> <p>1 with -- they assume that the transmission lines are 2 going to light fires and that we have not come to a 3 conclusion that that doesn't happen. So my testimony 4 tonight wants to shed light on the issues that I have 5 regarding a potential fire from these transmission 6 lines. 7 The damage that concerns me the most is 8 long-term. Even more than the loss of buildings, 9 dwellings or equipment or crops that are destroyed, it 10 is the damage from an in-crop fire that is detrimental 11 to our soil and our livelihood. Buildings can be 12 rebuilt, equipment can be replaced. But the moment a 13 fire hits the soil, the soil can be damaged. 14 The cropping system this transmission line 15 crosses over is one of our really most prized fields, 16 untouched in many ways from any of mankind's buildings 17 or roads, so to speak. It is our job to manage this 18 field, and we do so, with respect to the soil, as best 19 we can. 20 We work to maintain the soil. Our livelihood 21 depends on the soil. We have to consider soil organic 22 matter, soil microbes, soil structure, and sequestering 23 as much rainfall into this soil as possible due to our 24 low rainfall area. The soil is our most precious 25 resource, and preserving its health is our top priority.</p>

<p style="text-align: right;">Page 26</p> <p>1 Firsthand experience, along with the counsel 2 from the researchers at Columbia Basin Research Center 3 near Pendleton, Oregon, have revealed to me that a fire 4 in our dryland crop, which this transmission line goes 5 over, does destroy the crop. In their words, a 6 gentleman I talked to this morning, a researcher, I 7 believe his name was Steve, said literally a fire takes 8 the life out of a soil. 9 Here's what a fire does specifically to a 10 soil. It burns off organic matter. It kills the 11 microbial colonies that are needed for soil health. It 12 destroys the carbon-nitrogen cycle that we depend on to 13 break down the previous crop into nutrients that can be 14 used for the next one. 15 It destroys soil structure. Soil structure is 16 critical for the ability of the soil to hold water and 17 also for the soil to be able to take higher rates of 18 water into it before it's eroded. Fire also creates a 19 wind erosion potential. In our area that's very 20 critical. 21 The long-term loss from soil damage could 22 threaten our livelihood. That is because the soil 23 rebuilding process takes years, perhaps 6 to 10 years, 24 to fully recover from a fire. Again, this is firsthand 25 knowledge and counsel from the research center.</p>	<p style="text-align: right;">Page 28</p> <p>1 What happens to our crop as it moves from a 2 small green, leafy plant and matures towards harvest to 3 this time of year, what they characterize as a living 4 load, a green, leafy plant, turns into what they call a 5 dead fire load. The Forest Service uses these 6 designations as they seek to understand how potentially 7 dangerous a fire can be in the forest. 8 So when our crop approaches a dead fire load 9 at full maturity, the fire that could happen at that 10 point in time is devastating to the soil. It does all 11 the things that I previously mentioned in destroying 12 that soil. 13 It is also important for me to note, however, 14 that a postharvest fire, fire when the crop has been 15 harvested, there is a significant height difference with 16 the remaining residue. It can also be very dangerous. 17 And those are the fires that I fought and had personal 18 comment from the neighbors describing to me years later 19 they can still tell where the yield reduces where the 20 line of the fire started. 21 This is the place we live in. These are the 22 climate conditions that we face; hot, dry, windy days, 23 wind speeds in the 20s or 30 miles per hour. They all 24 happen simultaneously. These are the conditions that 25 have me extremely concerned. If these transmission</p>
<p style="text-align: right;">Page 27</p> <p>1 The revenue loss encountered by the soil 2 destruction would be financially disastrous to us. We 3 currently have no protection from that kind of loss. We 4 are simply exposed to that risk. 5 The second issue that I think is specific to 6 our area is our climate. We have very dry conditions in 7 the spring, late spring and summer, sometimes into the 8 fall, with low relative humidity. Our area has some of 9 the lowest relative humidity percentages over a cropped 10 land of perhaps any place in the state. These dry 11 conditions do not suppress the ignition of a fire. 12 The National Weather Service issues red flag 13 warnings. We had one just a few days ago. I spoke with 14 the National Weather Service and had quite a 15 conversation with the gentleman there. Red flag 16 warnings happen a couple times during June, July, and 17 August in our area, sometimes even into September. 18 These warnings indicate that a fire can spread rapidly 19 upon ignition. The red flag warning is an indication 20 that widespread fire damage can occur. 21 Now, just to clarify, the Weather Service 22 cannot predict a fire; it can predict the possibility, 23 the probability of a lightning strike in your area. So 24 it also depends on determining fire load and other 25 weather conditions that can make a fire possible.</p>	<p style="text-align: right;">Page 29</p> <p>1 lines started a fire, it could spread for miles. 2 My goal here today is that you understand that 3 the destruction of our soil resource is very troubling 4 to me. The pennies we might receive from a right-of-way 5 to Idaho Power does not compensate us for the risk we 6 would bear. What is at stake here is our soil. 7 I would urge the Siting Council to consider 8 this testimony as it specifically relates to this area. 9 We cannot ignore the environmental damage to the soils 10 that could happen on an event that is possible almost 11 every year. Red flag warnings, like I mentioned, can 12 be -- we've seen them perhaps on average once a month, 13 maybe twice a month. Like I said, the Weather Service 14 lists those, put those out there so the general public 15 knows that if somebody is going to be doing something 16 that could potentially start a fire, it could spread 17 rapidly and cause massive amounts of damage. 18 So I thank you for being here and hearing my 19 testimony. When I had considered this project some, 20 almost 10 years old now, I can't believe that for 21 pennies for a right-of-way our farm could be devastated 22 financially. We could be left with nothing. Our 23 margins on that farm are small. There is no protection 24 for a 7-, 8-year yield reduction. We live with that 25 risk, and now we're adding potentially another risk</p>

<p style="text-align: right;">Page 30</p> <p>1 factor to that environment. 2 There are other problems on our farm that I 3 have with this. We have an airstrip that will probably 4 be rendered useless because of the transmission lines' 5 location; we have Internet communication that could be 6 interrupted; and the cropping system that we use, most 7 likely I can't use an aerial applicator in that area. 8 It would make it extraordinarily more expensive to fly 9 next to this transmission line. So I have a lot to 10 lose. I have a lot to overcome if this happens. 11 So I appreciate the Council's consideration of 12 what I hoped to have made very specific, very real, very 13 credible information. We're talking about an 14 environmental problem and we're talking about destroying 15 a resource that could probably, in my opinion, there 16 might be better ways to serve the needs of power 17 somewhere else than making me live under such a 18 disastrous risk from the transmission lines. 19 Thank you very much. 20 HEARING OFFICER WEBSTER: Thank you, 21 Mr. Myers. 22 Next up is John -- is it Luciani? 23 MR. JOHN LUCIANI: I'm not quite ready, 24 please. 25 HEARING OFFICER WEBSTER: Do you want me to</p>	<p style="text-align: right;">Page 32</p> <p>1 electrical industry. After over 125 years, our mission 2 still stands as that. 3 The things that I want to bring to light are 4 the IBEW is in agreement with this project. We're in 5 support of this project for all the reasons identified 6 by Idaho Power. But the most important is for balancing 7 the renewable resources throughout this region and the 8 Intermountain West. 9 When we look at the constraints that are on 10 current transmission right-of-ways, those constraints 11 lend to high-capacity time periods in which additional 12 transmission lines throughout our regions can help 13 minimize I think some of these fire concerns that a lot 14 of the public has. The more that a transmission line is 15 overloaded, the more likelihood or the potential for the 16 system to fail, and the more likelihood of those fires 17 could occur. 18 I'm not here to discuss the potential routing 19 as far as the benefits or the considerations that went 20 in prior to this. My testimony is just to discuss the 21 imminent need. Transmission lines throughout this 22 region as well as connecting the Intermountain West are 23 needed in order to balance the peak-and-valley nature of 24 our renewable portfolios. 25 The energy imbalance market is something that</p>
<p style="text-align: right;">Page 31</p> <p>1 put you at the end of the line? 2 MR. JOHN LUCIANO: Please. 3 HEARING OFFICER WEBSTER: Next is Travis Eri 4 or Eri? 5 MR. TRAVIS ERI: That's correct. 6 Hello. Travis Eri. It's T-r-a-v-i-s, E-r-i. 7 Address is 17200 Northeast Sacramento Street, Portland, 8 Oregon 97230. 9 So to start with, my background, I'm a 10 journeyman lineman, having worked in the Pacific 11 Northwest, earning my certificate right here throughout 12 Oregon, Washington, and Idaho. I currently am the 13 business manager for International Brotherhood of 14 Electrical Workers, Local Union 125. And IBEW 125 15 represents the electrical workers throughout Oregon, 16 Washington, Idaho, and Montana, consisting of 3600 17 members in the utility and construction industry in all 18 sectors of construction, transmission, and distrib- -- 19 or generation, transmission, and distribution services. 20 I'd like to start by recognizing all those who 21 may be in opposition of this project for various 22 reasons. My testimony is not to minimize any of their 23 concerns that they are here discussing today. 24 The IBEW was formed in 1891, and our purpose 25 and our mission was to stand for improving safety in the</p>	<p style="text-align: right;">Page 33</p> <p>1 Pacific Power started several years ago, and many of the 2 utilities have joined into this. And it's nothing more 3 than basically sharing transmission authority between 4 different regions and taking advantage of 5 peak-and-valley natures of renewable portfolios. 6 What it allows for is a reduction in having to 7 spend resources to create new generation, allowing for a 8 lot of our carbon-emitting generation facilities to be 9 able to scale back and take advantage of excess 10 renewable in other areas. 11 The Boardman to Hemingway line, in what I have 12 seen from the studies, will do just that. It will 13 balance out renewable portfolios within the 14 Intermountain West, and the Oregon and Washington 15 Columbia River Gorge renewable portfolio, taking 16 advantage of those resources at different times when 17 they will be able to exchange power. 18 The additional benefit, other than easements 19 to those that are affected by the transmission 20 corridors, are also going to be felt through the 21 reduction in necessary transmission -- or sorry, 22 necessary generation being built in order to cover the 23 electrical needs of our communities. 24 And with Bonneville Power Administration 25 joining the energy imbalance market, all of the</p>

ESTERSON Sarah * ODOE

From: sam myers <sam.myers84@gmail.com>
Sent: Wednesday, August 21, 2019 7:59 PM
To: B2H DPOComments * ODOE
Subject: B2H project siting comment

Sam Myers
68453 Little Butter creek road
Heppner, Oregon 97836
sam.myers84@gmail.com

August 21, 2019

Energy facilities
c/o kellen Tardewether, Senior siting Analyst Oregon Department of Energy
550 Capital St. N.E.
Salem, Oregon, 97301

Via, email.. B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for site Certification for the Boardman to Hemingway Transmisson Project 9/28/2019
Draft Proposed Order.

Dear Chair Beyeler and members of the council:

After giving a oral presentation at the Boardman Oregon public comment meeting, I have even more concerns about the B2H Transmisson line routed over our farm in Morrow county.

It seems that those involved with the use, construction and rent of this transmission line will be enriched financially while those who's lives are directly impacted by the risks and dangers of the transmission line get very little compensation!! A one time right of way payment does not even begin to compare with the value of the energy that passes through the line! The fact is, this transmission line's necessity has come under scrutiny and rightfully so!! This line does not meet the "good of the public" criteria any more!! The money makers at play in this project seem to be pushing the project to make money while those people directly impacted, are only to suffer the risks!! I am disgusted that we could be so unfairly compensated/abused!! This transmission line produces; health risks, fire risks, not to mention cropping restrictions, communication problems, land use issues and yearly ongoing structure avoidance! These problems will make our farming existence even more difficult. All of this for a minimal one time payment, an absolute disparity!! We have heard from various sources that right of way payments could range from 8 to 10 thousand dollars for various properties; this does not even come close to the risks we would encounter from the this transmission line!! While others continue to financially gain year after year we are offered nothing for the continued risks we endure!!

I am extremely concerned about the voltage of this transmission line as well, it is the highest voltage used (500kv). I am concerned that our low humidity and high temperatures have not been studied enough to guarantee our safety!! As I stated in my oral presentation, fire is our biggest concern and with the 500kv line no one has studied its impact at our location or the conditions that exist on our farm, at this highest voltage. I would contend that we simply do not have safe conditions for this transmission line!! Our livelihood is at stake potentially 6 months of every year!! This is also disturbing to me that utility companies are not fully dealing with the risks and continue the process to build this transmission line; to solve a problem that has many other solutions!! Even a quick google search online reveal several sites detailing the facts about health dangers of the electromagnetic field surrounding a transmission line of this voltage!!

Please do not allow a disaster to unfold over our farm!,

Sincerely,
Sam Myers

Sent from my iPad

ESTERSON Sarah * ODOE

From: sam myers <sam.myers84@gmail.com>
Sent: Thursday, August 22, 2019 1:19 PM
To: B2H DPOComments * ODOE
Subject: Weed Control Management Plan not consistent with Oregon or County requi...
Attachments: Weed Control Management Plan not consistent with Oregon or County requi....pdf

I agree with this report and find the omission of a valid weed prevention plan to be completely unacceptable, I'm constantly fighting weeds in our farm, this would only make matters worse!!! Please do not allow the incomplete project we'd plan to continue!!

Sincerely
Sam Myers

Sent from my iPhone

August 21, 2019

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

email: B2H.DPOComments@Oregon.gov

The Draft Proposed Order fails to control and treat Invasive Weeds resulting from the development.

NOXIOUS WEED CONTROL

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

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

Rules impacted with an example of the types of impacts which make the development out of compliance with the rule:

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

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

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

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

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

Comments provided by the Oregon Department of Fish and Wildlife state the need to address the introduction and spread of noxious weeds during the entire life of the project:

--OAR 345-025-0016 states, "In the site certificate, the council shall include conditions that address monitoring and mitigation to assure compliance with the standards contained in OAR Ch 35, Div. 22 and Div. 24. Given the speed with which invasive weeds can cause significant damage to surrounding habitat as well as agricultural and forest lands, the need exists to monitor and control noxious weeds on an annual basis during the life of the project.

The importance of this issue for the economic impact it has on the state is contained in Or. Report, 2014. That report estimated the economic impact of six invasive weeds studied was \$1.5 billion and \$2.4 billion personal income if infestation moved into the susceptible areas. This would represent 40.8 thousand jobs.

Following examples identify shortcomings in the draft proposed order and Noxious Weed Plan to meet the requirements of the above rules and statutes.

1. Construction and ongoing maintenance of the transmission line will introduce and stimulate the development of multiple noxious weed varieties which pose a threat to public and private property for many miles adjacent to the transmission line. Some seeds disperse for hundreds of miles. A failure to identify and treat noxious weeds prior to them dispersing seeds onto adjacent properties is a critical component of effective treatment to avoid these impacts. State law contained in ORS 569.390 requires the developer to treat weeds prior to seed dispersal, ORS 569.400 provides penalties for failure to do so and ORS 569.445 requires developer to clean machinery prior to moving it over any public road or movement from one farm to another. The statute requires cleaning to occur at the locations where equipment leaves or enters a public road or moves across a property boundary. Utilizing washing facilities located at multi-use areas or public facilities will not be consistent with the state statutes which the Oregon Department of Energy and Energy Facility Siting Council are required to adhere to.
2. The site certificate needs to include a monitoring schedule during the spring and summer periods of rapid growth that will address the actual invasive weeds along the right of way. Since different weeds go to seed from early spring through late fall, in order to meet the requirements of the statute, the monitoring plan must address the life cycle of the weeds potentially present at different locations along the right of way to assure weeds are identified and treated prior to seed dispersal. This would require visual inspections to occur based upon the timeframes for specific weeds to develop. Multiple examples are provided for Category A weeds which occur along the proposed transmission line. For example, flowering and seed production for the List A invasive weeds occurs as early as March for Scotch broom and extend into October for Purple loosestrife. These are both on List A.
3. *Section 1.3 of the Draft Plan indicates the following, "**IPC will only be responsible for the control of noxious weeds that are within Project right-of-way (ROW) and that are a result of the company's construction- or operation-related surface-disturbing activities. For EFSC purposes, IPC is not responsible for controlling noxious weeds that occur outside of the Project ROW's, or for controlling or eradicating noxious weed species that**

were present prior to the Project. With respect to pre-existing weed infestations, IPC recognizes Oregon Revised State (ORS) Chapter 569 imposes onto occupiers of land within a weed district certain obligations to control and prevent weeds; if IPC identifies pre-existing weed infestations within a Project ROW, IPC will work with the relevant landowner or land management agency to address the same consistent with ORS Chapter 569.”

As noted in the August 22, 2017 communication, IPC is responsible for all weed infestations in the right of way, regardless of whether or not they existed at the time the transmission line right of way is assumed just as any person assuming a right of way would be responsible.

4. *Section 2.1, Page 4 , last sentence in section, states counties were contacted to determine if each county requires specific noxious weed control methods or best management practices **“No specific best management practices were requested by any of the county weed management personnel contacted.”**

Contrary to this statement, Union County Weed Control submitted 31 comments and concerns developed by the weed supervisors of Morrow, Umatilla, Union County, Dept of Agriculture and Tri-County CWMA and incorporated comments from previous meetings with Malheur and Baker County weed supervisors. Most of those requirements submitted on August 22nd, 2017 do not appear in the draft proposed order or the Draft Weed Management Plan. The site certificate needs to include a condition requiring the Weed Management Plan to include these 31 items. The Draft Proposed Order and Draft Weed Management Plan fail to assure that the counties (as well as private landowners) will not sustain significant and ongoing financial consequences due to the failure of Idaho Power to control the invasive weeds which will be introduced and the numbers increased due to the development of this transmission line. It is, therefore, imperative that the counties receive the proposed final Weed Management and Habitat Restoration Plans for their approval prior to being implemented; and an advisory council of private landowners should be included.

5. ***Section 5.0 repeats the limit of IPC’s responsibility** and lists specific areas which with existing roads only includes areas involving ground-disturbing construction and/or improvements (e.g. new cutouts.)

IPC is responsible for all noxious weeds within the site boundary as well as noxious weed infestations outside the site boundary if the development and/or use of the ROW contributed to the increase in noxious weeds. IPC is responsible for areas of overland travel which they indicate they will be using as well as any weed infestations occurring as a result of IPC use of other roads.

6. *Section 5.0 , Page 18, also states **“IPC is not responsible for controlling noxious weeds that occur outside of the Project ROWs or for controlling or eradicating noxious weed species that were present prior to the Project.”**

IPC states they will work with landowner to deal with pre-existing weeds consistent with ORS Chapter 569. IPC is responsible for all weeds inside the ROW which are there once they assume control of the transmission line corridor. In addition, they are responsible for any increased number or species of weeds that occur as a result of the development action they are proposing.

7. ***Section 5.2.1 Vehicle Cleaning: States construction contractors vehicles and equipment will be cleaned prior to arrival at the worksite.**

It fails to require vehicles and machinery to be cleaned prior to moving onto public road or require vehicle and machinery cleaning as construction progresses along ROW and moves from one property owner to another. The plan indicates that will be determined by land management agency and ODOE. The requirement is dictated by statute and the land management agency and ODOE do not have the authority to overrule the statute.

8. ***Section 5.2.3 “ On BLM or USFS land the construction contractor may be required to provide additional treatments to prevent return of noxious weeds where topsoil is removed (i.e., pre-emergent pesticides).”**

The Weed Management Plan for Private and State lands needs to include this option as determined by the local weed management supervisor.

9. ***Section 5.3.2, page 24, paragraph 1 states that Idaho Power will identify areas where preconstruction noxious weed control measures will be implemented.**

Preconstruction noxious weed control measures need to be implemented wherever noxious weeds exist.

10. ***5.3.4 Page 24 states: “Noxious weed control efforts will occur on an Annual Basis for the first 5 years post-construction. When it is determined that an area of the Project has successfully controlled noxious weeds at any point during the first 5 years of control and monitoring, IPC will request concurrence from ODOE. If ODOE concurs, IPC will consult with ODOE to design an appropriate plan for long-term weed control. If control of noxious weeds is deemed unsuccessful after 5 years of monitoring and noxious weed control actions, IPC will coordinate with ODOE regarding appropriate steps forward. At this point, IPC may suggest additional noxious weed control techniques or strategies, or may request a waiver from further noxious weed obligations at these sites. If a waiver of noxious weed control is granted, it will include justification for how the waiver is consistent with the appropriate EFSC standards.” This is repeated in Section 6.1, Page 25.**

This section does not support management of noxious weeds for multiple reasons including:

1. During the first five years after construction, weed control needs to occur on a timeline that addresses the weeds present at the location as determined by Idaho Power and the local Weed Supervisor. Annual control does not account for the timing for noxious weed species going to seed.
2. Following the initial 5 year period, noxious weed control needs to occur at least annually for the life of the project as IPC will be using the ROW on an ongoing basis for repairs, monitoring, inspection, vegetation management, etc. In addition, there may be unauthorized uses of the transmission line right of way by such things as ATV's, hunters, etc. that increase noxious weeds due to the access the developer is providing by building the transmission line. These impacts must be addressed by the developer.
3. Noxious weed control efforts are planned to occur annually for the first 5 years post-construction and can end sooner if ODOE concurs that noxious

weeds have been controlled. Noxious weeds will not be controlled absent ongoing monitoring and treatment for the life of the project. No waiver of annual control and monitoring of noxious weeds should occur due to the fact that in a single year, large numbers of plants can occur given that some of these plants disperse at least 900 to 1,500 seeds as the previously referenced and attached information sheets on some of the plants on the A list confirm.

11. ***Section 6.2 The annual Noxious Weed Monitoring Report is only planned to be submitted to IPC and ODOE and land management agencies as required.**

These reports should also be submitted to the County Weed Control Supervisors and private land owners. Idaho Power needs to be designated as the responsible party for completion of things such as annual reports rather than “construction contractors.” If Idaho Power wants to contract with a construction contractor to complete these for their approval and submission, they have the option of doing that. The contractors will change and there will be no continuity in terms of methodology, reporting, etc.

12. ***Section 6.3 Ongoing Monitoring and Control “IPC will be responsible for monitoring and control of noxious weed infestations as set forth in the terms and conditions of the ODOE Site Certificate, BLM ROW grant, and USFS special-use authorization. The BLM, USFS, ODOE, and counties may contact IPC to report on the presence of noxious weed populations of concern within the ROW.” “IPC will control the weeds on a case-by-case basis in consultation with the land management agency and/or landowner, as appropriate.”**

Following a report of a noxious weed infestation, IPC needs to provide the information including the location of the noxious weed population and consult with the local weed management supervisor to identify an appropriate plan of action.

13. ***Section 8.0 Places responsibility for development of Final Noxious Weed Plan, documentation of existing infestations adjacent to the survey area, documenting results of the preconstruction noxious weed inventories, mapping areas subject to preconstruction noxious weed treatment, and providing a detailed control methodology for each noxious species, etc. to “The Construction Contractors”.**

Idaho Power is assuming no responsibility and the accompanying accountability for this program or the results. The developer needs to be listed as the responsible party.

14. ***Section 3.2 states “existing site-specific disturbances and land uses (e.g. grazing, grading, etc.) that could be contributing to the introduction, spread, or viability of weed populations were also recorded.”**

This information should only be used to identify areas where the opportunity provided by the construction and operation of the transmission line could provide an opportunity for an increased occurrence of noxious weeds. It should not be used to provide the developer an excuse for not meeting their responsibility for monitoring and controlling weed infestations which are going to be stimulated due to the existence of the transmission line. The draft weed management plan

provides ongoing references which indicate that IPC does not consider themselves responsible for noxious weeds when they are present in areas outside the ROW or when they result from things such as recreational use, grazing, other construction projects, natural occurrences, or when the developer did not physically disturb the area. It needs to be clear that the existence of the transmission line will increase the numbers and species of invasive weeds absent ongoing monitoring and treatment which the developer is required to provide.

15. ***Section 5.3.1.3, Third Paragraph, Page 22 says herbicide and application rates will be approved by "County Weed Supervisors or Superintendents". Top of Page 23 says "Herbicide will not be applied prior to notification and receipt of written approval from the applicable land management agency, ODOE, or private landowner."**

This section appears to allow ODOE to determine what herbicides are used. Appears at least some landowners will have "landowner agreements." Developer needs to be required to develop landowner agreements with willing landowners and provide written notice to any landowner who's property will be sprayed with chemicals so that the unless there is a landowner agreement, the impacted landowner can determine if chemicals should be used, and if there should be any restrictions based upon the conditions on their land or adjoining land such as organic gardening, necessary setbacks due to flowing water or wetlands, sensitive plant species, etc.

16. **Page 23, final paragraph says, "Final species-specific noxious weed control methodologies will be included by the Construction Contractor(s) in the Final Noxious Weed Plan."**

The noxious weed plan is the responsibility of Idaho Power and should involve the county weed control agency as well as the landowner.

A failure to manage noxious weeds would result in a significant financial burden being placed upon the county and landowners. Noxious weeds have been identified as the most significant threat to agriculture. In addition, introduction and increased numbers of noxious weeds in wildlife habitat would reduce the value of this habitat to wildlife dependent upon it and result in wildlife fatalities through starvation or displacement to less desirable habitat. Native plant species are at risk of depredation, some to the point of extinction, if weeds are not controlled.

The application and draft proposed order lacks conditions that will keep noxious weeds from spreading within the counties and the state. There is no serious effort to provide mitigation for the negative impacts of the spread of weeds within habitat or on agricultural or forest land.

The final plan will not be completed until after the site certificate is issued. County Commissioners need to be able to assure the citizens that the final plan provides adequate management of noxious weeds. For this reason, the concerns listed in this letter need to be addressed in the site certificate and the following site certificate conditions need to be included.

Recommended site certificate conditions:

- The revegetation plan will require ongoing inspections of the right of way based upon the types of noxious weeds present and be performed in a timeframe that will allow for treatment prior to seed dispersal.
- The monitoring plan will remain in effect for the life of the project including annual monitoring and treatment necessary to address invasive weeds within the ROW and adjacent land identified as having increased occurrence of invasive weeds compared to control sites.
- The County will be provided a copy of the completed weed management plan for county comment and approval prior to it being accepted as final. Advisory consultation of landowners and professionals will be part of the county approval process.
- Two sample plots will be identified in each county outside the right of way at locations within ½ mile of the right of way to be monitored for increased invasive weeds. Two additional sample plots will be identified at distances recommended by the Oregon Department of Agriculture from the transmission line in areas that should not be impacted by weeds on the ROW. In the event that noxious weed infestations increase at a rate greater than similar areas located in sample plots, Idaho Power will treat or provide funding for County staff, equipment and means to treat the area of increased infestations outside the ROW.
- Increased invasive weeds in the area of seed dispersal determined by the Oregon Department of Agriculture, will be presumed to have occurred as a result of habitat impacts of the development. This includes noxious weeds spread from areas outside the ROW, recreational use, grazing, other construction projects, unless the developer provides convincing evidence that the infestation would have occurred absent the development of the transmission line.

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

Sincerely,

ESTERSON Sarah * ODOE

From: Kathy Myron <krmyron@frontier.com>
Sent: Tuesday, August 20, 2019 4:32 PM
To: B2H DPOComments * ODOE
Subject: Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

August 20, 2019

Energy Facilities Siting Council

c/o Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St, N.E.

Salem, OR 97301

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

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

RE: Anadromous Fish in Ladd Creek, Union County

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

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

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

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

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

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

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see <https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151>).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see <https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648>). Construction has resulted in costs over 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service

(see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and ([PPT] Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it's determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species (ESA). The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

The B2H Draft Proposed Order contains the following outdated information:

1. In *Table 1. Road-Stream Crossing Ownership, Risk Summaries, Proposed Crossing Types, and Fish Passage Information* Idaho Power names 5 waters in the Ladd Creek area (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*) with stream crossings. The report states that the only fish in these waters are resident fish. This information is now incorrect.

2. The B2H Draft Proposed Order states that for all of Ladd Creek and its tributary streams that “No new ODFW fish plan anticipated.” (page 9-11 of Attachment BB-2). It cannot be overemphasized that this information is now incorrect.

3. The alternative route Idaho Power has chosen will necessitate a 3a/3b (page 11 BB-2) design change for a bridge crossing on Ladd Creek if this route is chosen, this will trigger an ODFW fish passage plan to be implemented (OAR 17 412-0035) based on Oregon Administrative Rules (OAR) 635-412-0020. Again, the B2H Draft Proposed Order information is now incorrect.

Because of the change of status of the fish population in Ladd Creek, the B2H Draft Proposed Order is out of compliance with several Federal and State laws including:

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

(a) The mitigation goal if impacts are unavoidable, is no net loss of either habitat quantity or quality and to provide a net benefit of habitat quantity or quality.

(b) The Department shall act to achieve the mitigation goal for Category 2 habitat by recommending or requiring:

(A) Avoidance of impacts through alternatives to the proposed development action; or

(B) Mitigation of impacts, if unavoidable, through reliable in-kind, in-proximity habitat mitigation to achieve no net loss of either pre-development habitat quantity or quality. In addition, a net benefit of habitat quantity or quality must be provided. Progress towards achieving the mitigation goals and standards shall be reported on a schedule agreed to in the mitigation plan performance measures. The fish and wildlife mitigation measures shall be implemented and completed either prior to or concurrent with the development action.

(c) If neither 635-415-0025(2)(b)(A) or (B) can be achieved, the Department shall recommend against or shall not authorize the proposed development action.

In conclusion, the B2H Draft Proposed Order contains an improper evaluation of the potential short and long term negative impacts to the fish habitat in the Ladd Creek drainage, including surrounding creeks, given the fact that species listed as threatened under the Endangered Species Act are now returning to Ladd Creek, with their numbers expected to increase in upcoming months and years.

Sincerely,

Kathy Myron
640 N. 9th St.
Union, OR 97883
krmymron@frontier.com
(541)562-5629

August 2, 2019

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

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

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

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

Some forest facts related to this section:

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

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

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

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

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

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

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

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

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

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

In summary:

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

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


Signature


Printed Name

Mailing Address:

TARDAEWETHER Kellen * ODOE

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

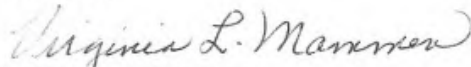
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

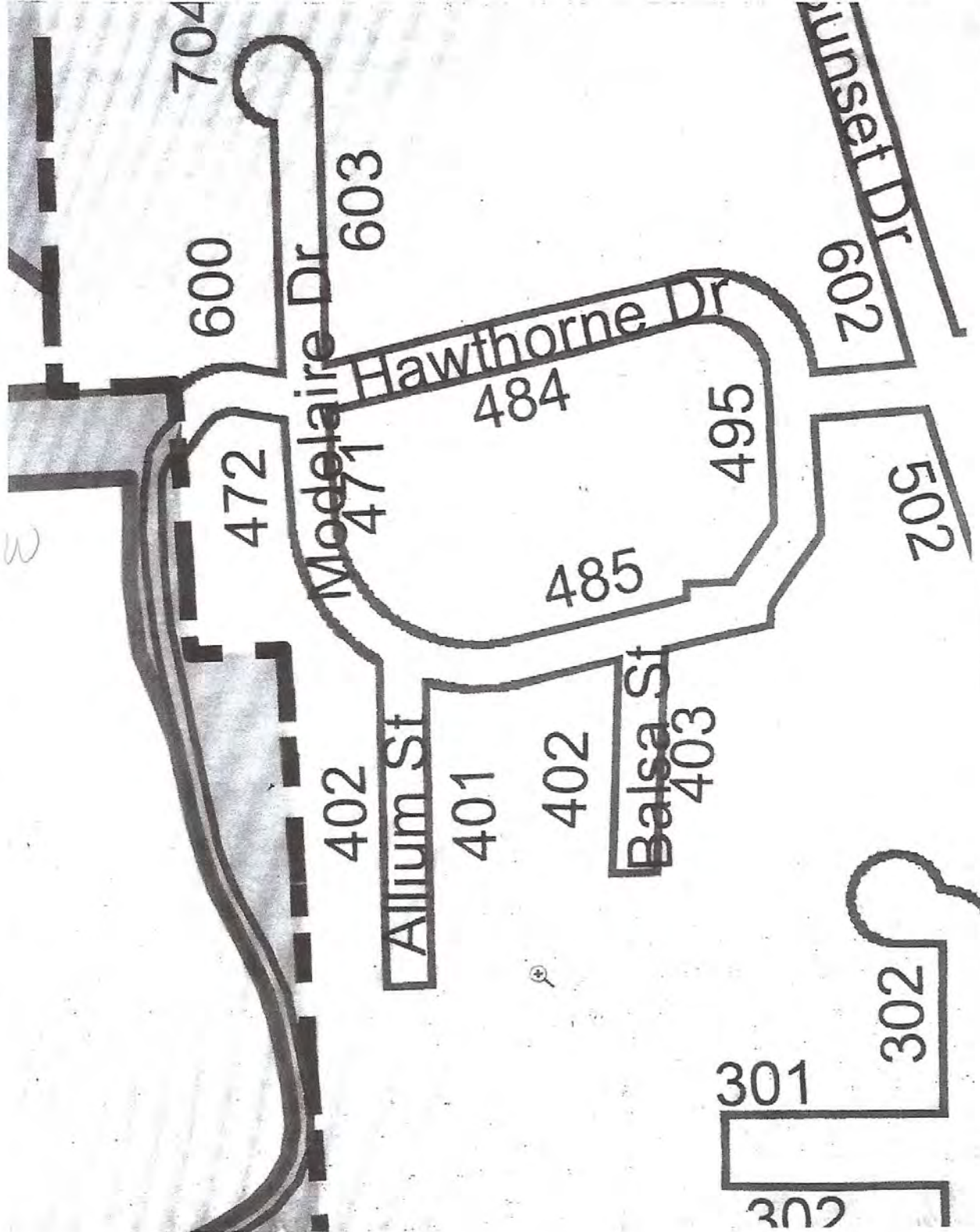


Exhibit 3

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



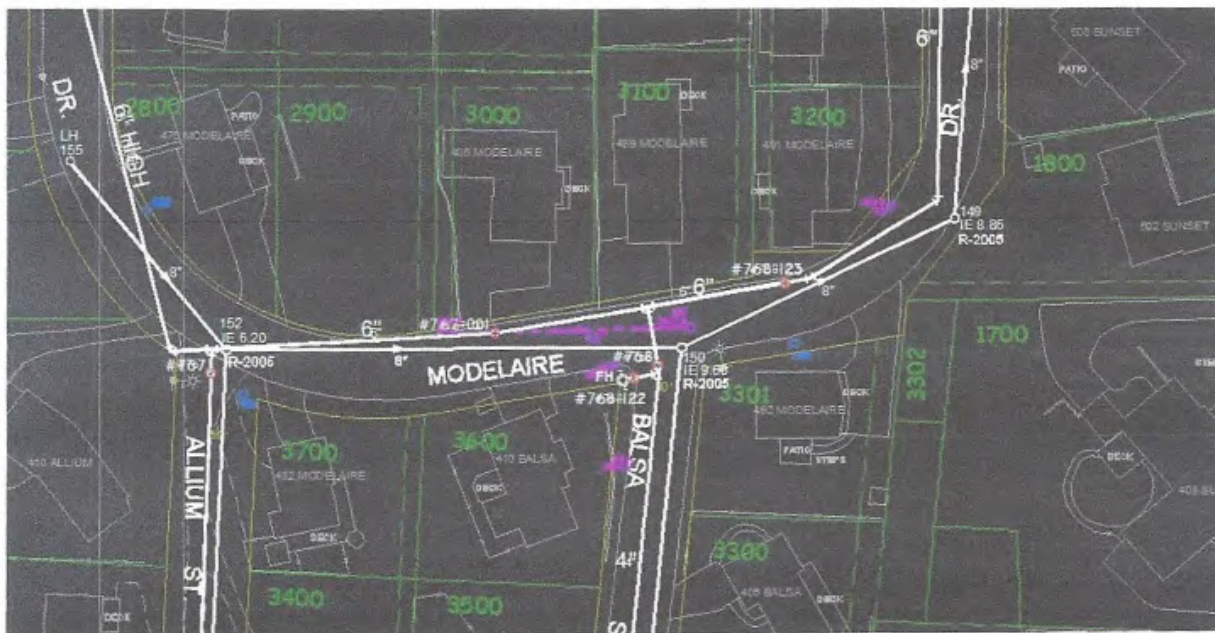
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

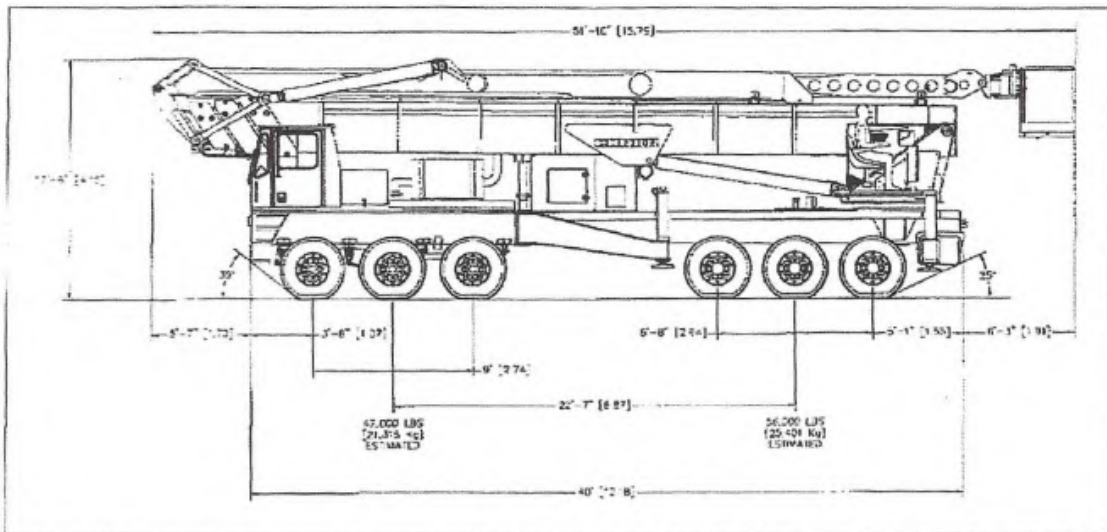


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

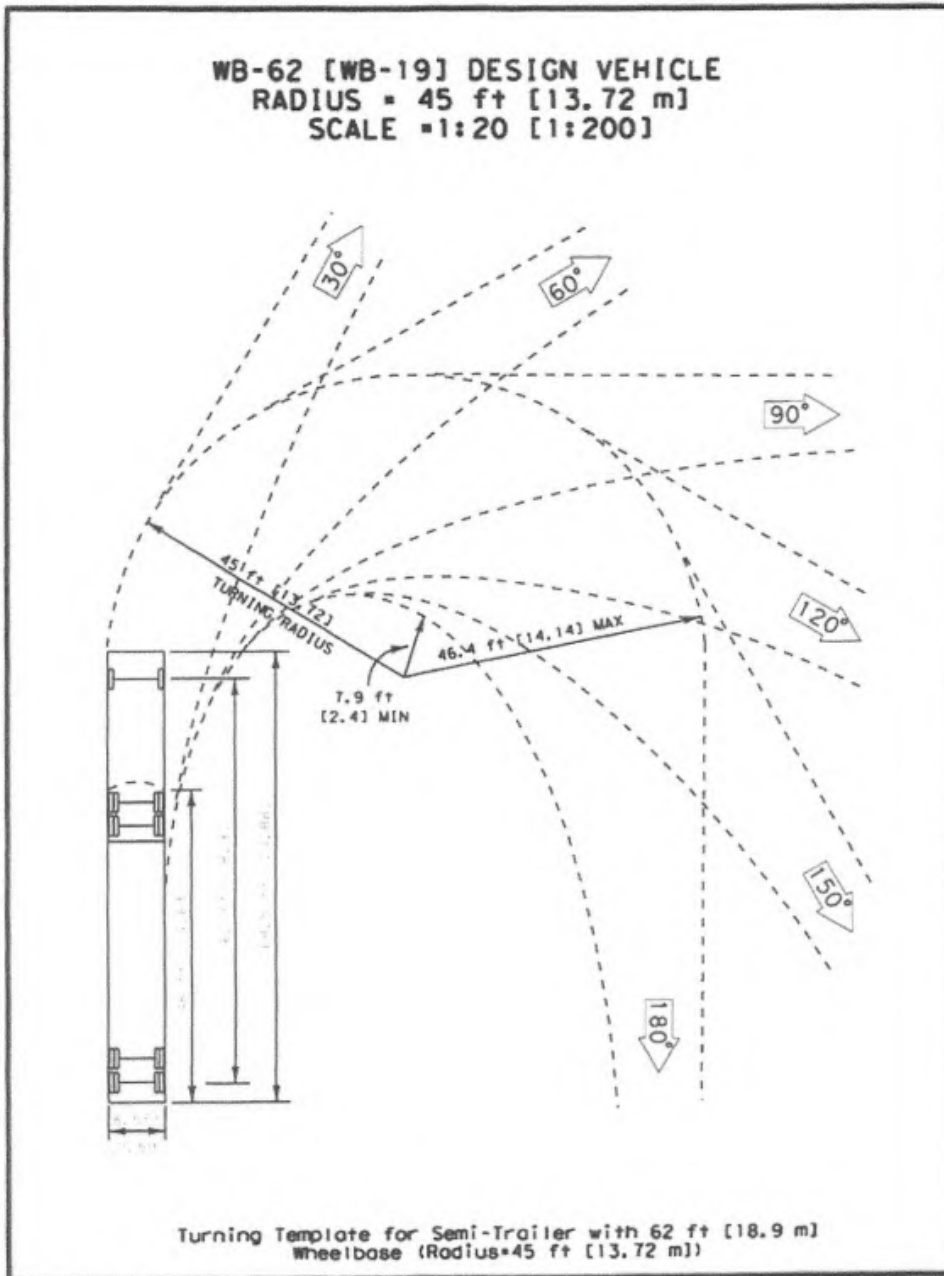


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

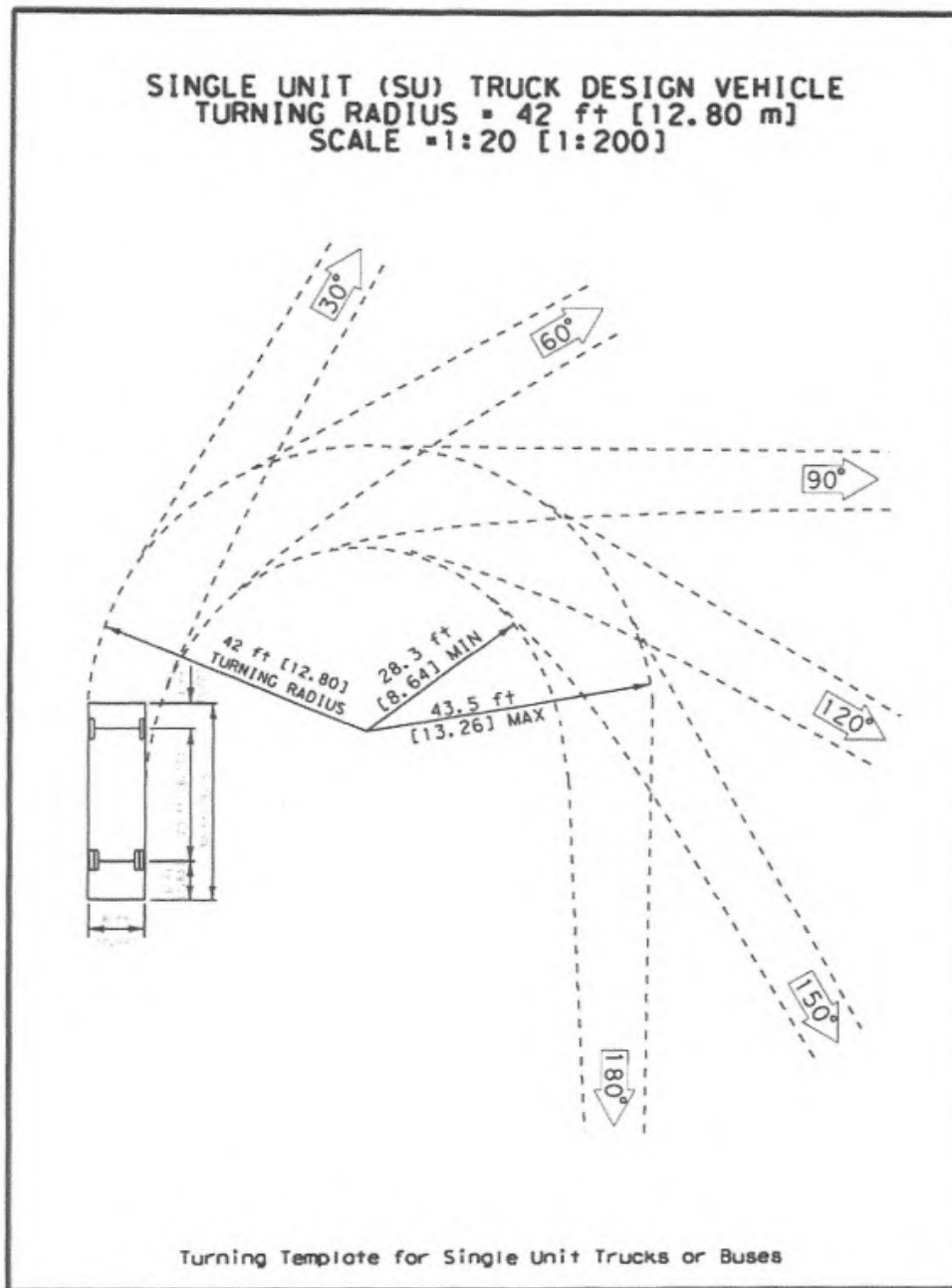


Exhibit 15

**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.

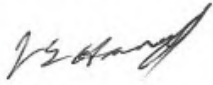
Section 17. TRUCK ROUTES

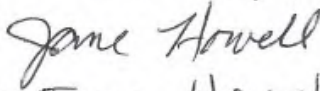
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000,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

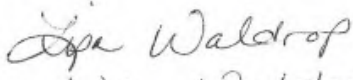
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

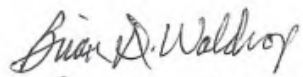
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement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

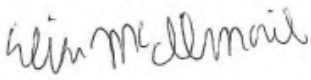
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this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


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

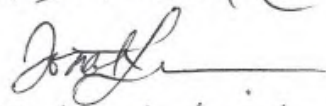

Chris Huxell
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CHRIS Huxell @ EMAIL.COM

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Jonah Lindeman
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Marie Skinner
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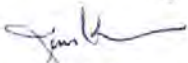
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EMAIL

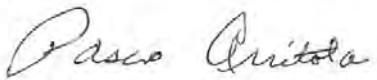
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

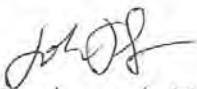
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
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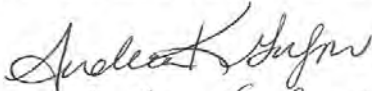
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PRINTED NAME Jim Kreider
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EMAIL jkreider@campblackdog.org

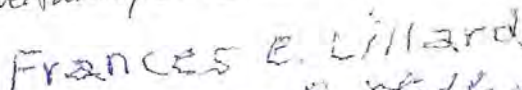
SIGNATURE 
PRINTED NAME Judie Arritola
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SIGNATURE 
PRINTED NAME Pasco Arritola
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PRINTED NAME John Bazuta
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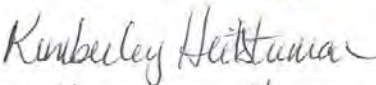
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
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SIGNATURE 
PRINTED NAME Frances E. Lillard
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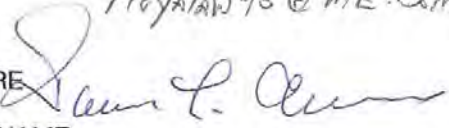
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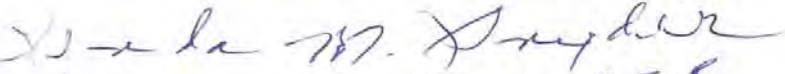
SIGNATURE 
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ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

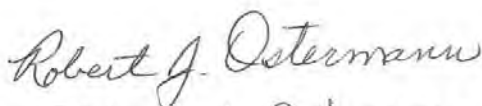
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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EMAIL kimheitstuman@hotmail.com

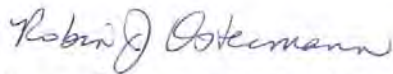
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SIGNATURE: 
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SIGNATURE 
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EMAIL N/A

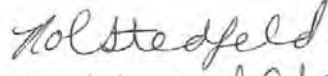
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ADDRESS 491 Modelaire
EMAIL

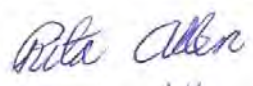
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ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

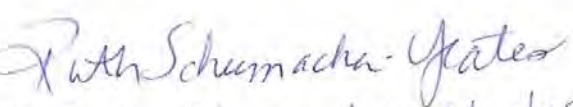
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ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

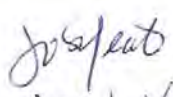
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SIGNATURE 
PRINTED NAME Jonathan D. White
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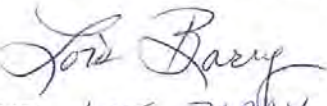
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

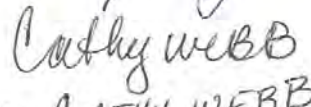
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

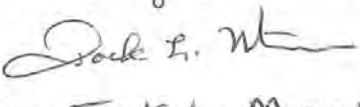
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PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

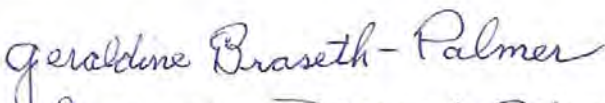

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

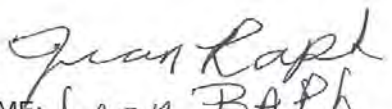
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

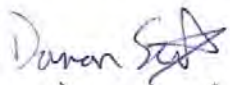
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


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

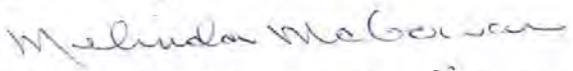
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 Goldenest Drive LA GRANDE, Ore 97850
EMAIL 


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

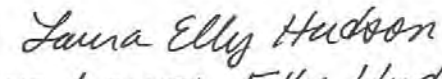
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SIGNATURE 
PRINTED NAME Damon Sexton
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE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

SIGNATURE 
PRINTED NAME Laura Elly Hudson
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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
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EMAIL rlvwd1910@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
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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
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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 - 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

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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.

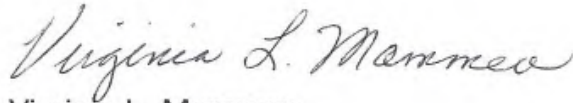
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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,

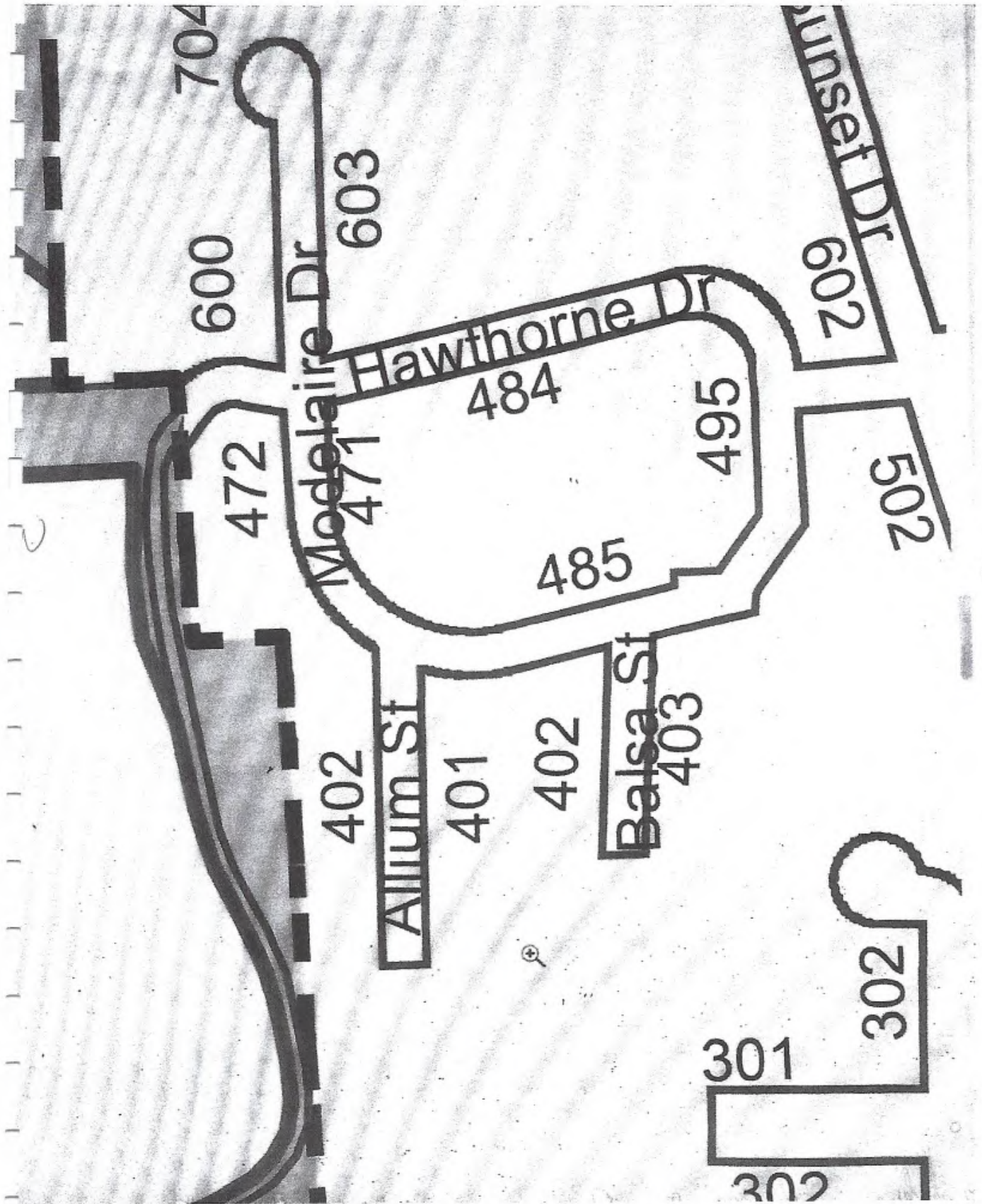


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



2

11

5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

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.

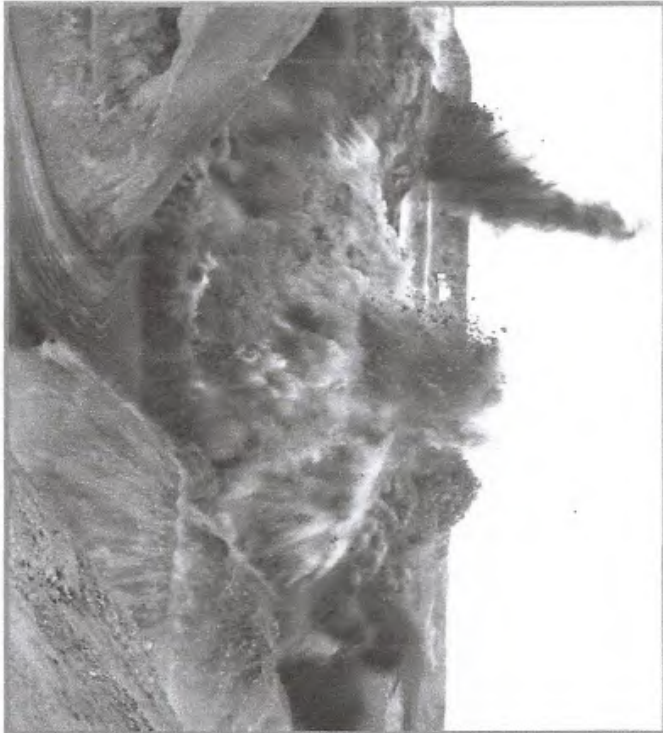
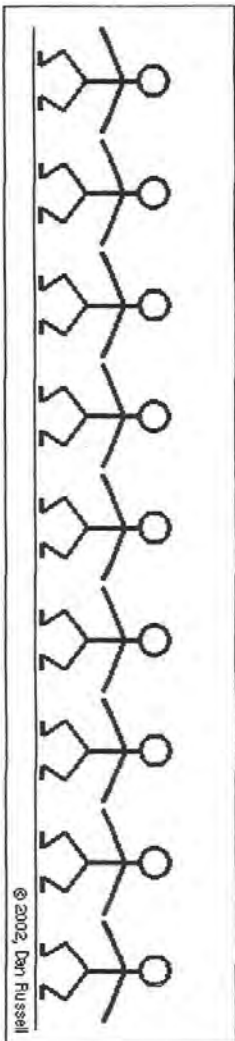


Exhibit 5b

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.

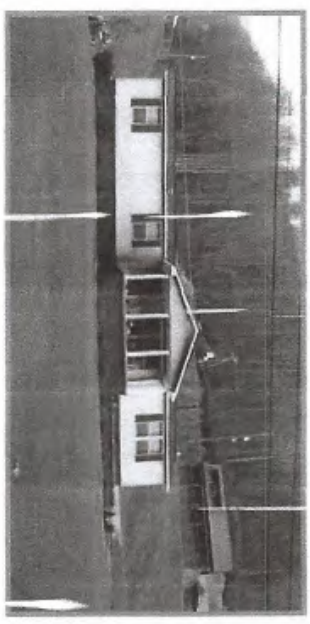
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior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

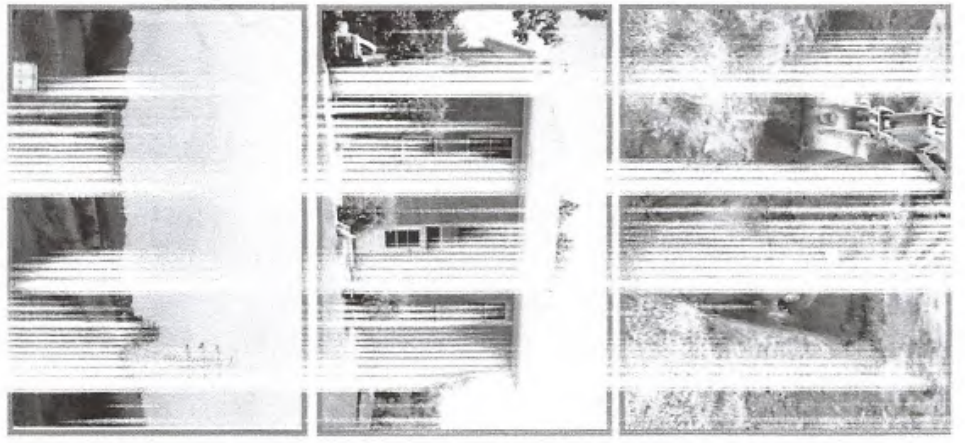
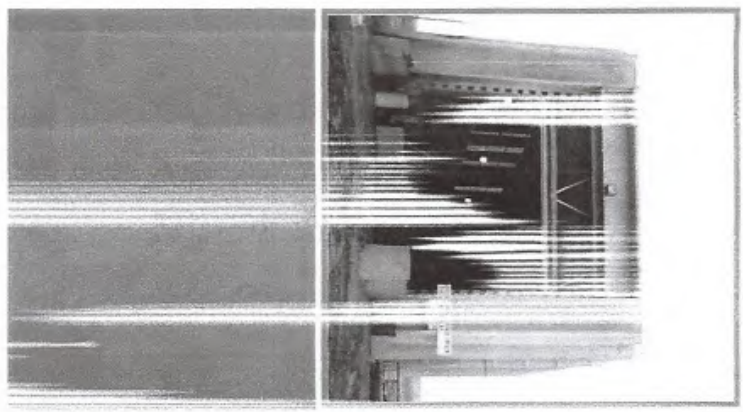
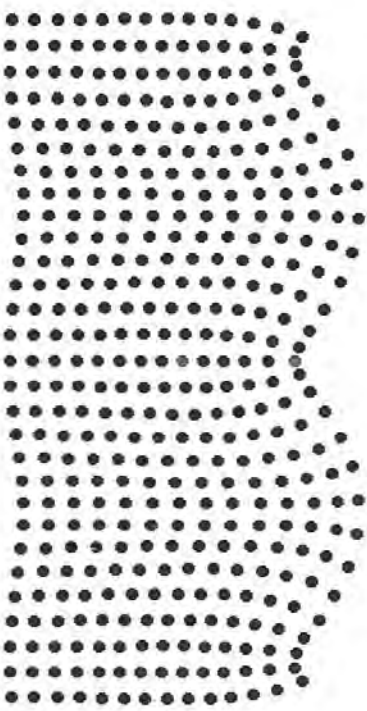


Exhibit 5D

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.



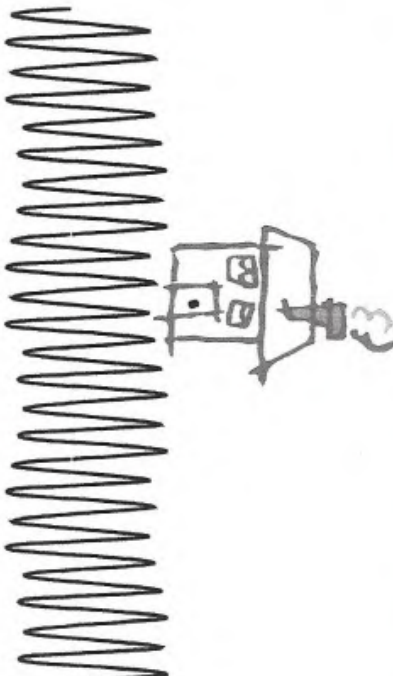
©1999, Daniel A. Russell

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.

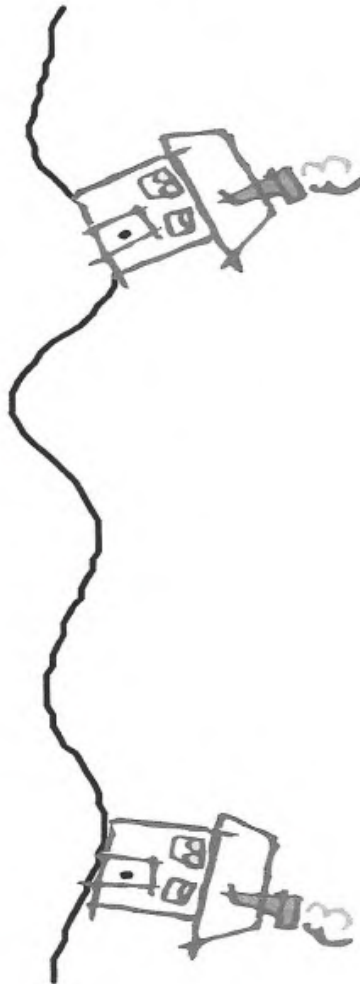
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

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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Trusted advice for a healthier life

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

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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

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

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Abstract

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

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

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

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EXPERT
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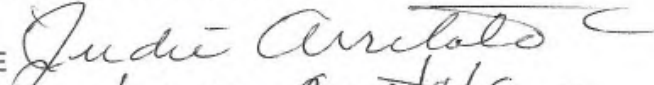



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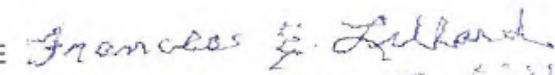
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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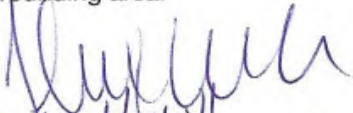
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to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

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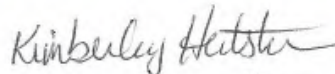
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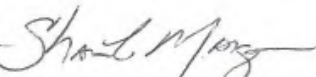
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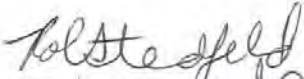
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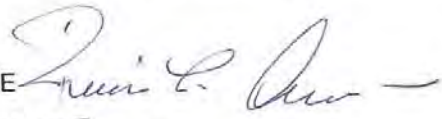
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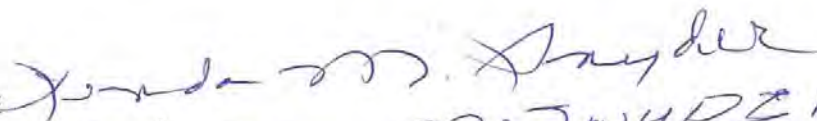
I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Madelaine Dr
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 17702 SHIRE
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

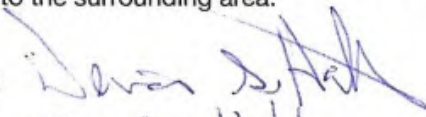
SIGNATURE *John Yeates*
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DRIVE LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

SIGNATURE *Ruth Schumacher Yeates*
PRINTED NAME Ruth Schumacher Yeates
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EMAIL ruthschumacheryeates@gmail.com

SIGNATURE *D. Dak Mammen*
PRINTED NAME D. Dak Mammen
ADDRESS 405 Balsa. La Grande, Or.
EMAIL dmammen@conic.com

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SIGNATURE



PRINTED NAME

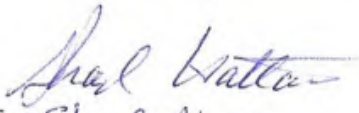
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

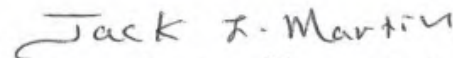
ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



PRINTED NAME

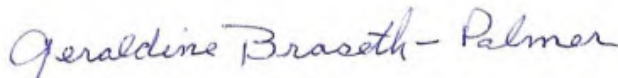
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

GERALDINE BRASETH-PALMER

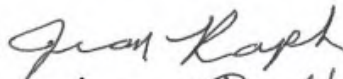
ADDRESS

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
ADDRESS 401 Balsa St La Grande, OR 97850
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
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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

SIGNATURE *Lois Barry*
PRINTED NAME LOIS BARRY
ADDRESS P.O. Box 566, LA GRANDE, OR 97850
EMAIL loisbarry31@gmail.com

SIGNATURE *Cathy Webb*
PRINTED NAME CATHY WEBB
ADDRESS 1700 Cedar St. LA GRANDE, OR 97850
EMAIL thinkski@gmail.com

SIGNATURE *JoAnn Marlette*
PRINTED NAME JOANN MARLETTE
ADDRESS 2031 Court St. #8, Baker City, OR 97814
EMAIL joannmarlette@yahoo.com

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

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

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

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

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

SIGNATURE *Anne G. Cavinto*
PRINTED NAME Anne G. Cavinto
ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL acavint@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR. 97850
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
ADDRESS 209 SWAPLO LA GRANDE OR 97850
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SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
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SIGNATURE *Carol Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekelen 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@coni.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

TARDAEWETHER Kellen * ODOE

From: Patricia Traffas <traffasp@gmail.com>
Sent: Wednesday, June 19, 2019 8:13 AM
To: B2H DPOComments * ODOE; MStokes@idahopower.com; JMaffucio@idahopower.com;
Gail Carbiener; Travis Boley
Subject: B2H

Thank you for the opportunity to comment once again.

You have, on numerous occasions, received explicit and precise information from Mr. Gail Carbiener who represents the Oregon-California Trails Association. His expert work should be carefully considered.

As President of the Oregon-California Trails Association, I wish to comment once again regarding B2H. Our Association (OCTA) has a very detailed Strategic Plan calling for action on many fronts, and many projects. The Number One goal we have is "To Preserve, Protect, and Develop Trail Resources." There are precious Trail Resources which would suffer great adverse effects with the B2H Project.

Please consider the viewshed at the National Historic Oregon Trail Interpretive Center at Baker City. Here, any visitor has unobstructed views of the Oregon Trail. This experience is one of a kind at this particular site, and offers the viewer an exceptional opportunity. Proposed towers would obstruct this view as well as threaten on-the-ground trail resources and remnants. **Our mission is to advocate for the preservation and protection of both the viewshed and on-the-ground trail resources. I ask a question of you: "Would you want a similar transmission tower in YOUR backyard?" Well, we do not want a transmission tower in OUR backyard! If this transmission power line must go through, only an underground line would be the acceptable result.**

And there are other areas and trail resources which will be impacted by the BSH project. Because of the threats to trail resources, the Oregon-California Trails Association (OCTA) recommends that the Council add an Oregon Trail expert to the Cultural Resource Team. The qualified Oregon Trail individual should have an undergraduate degree, with emphasis and specialty of anthropology, archaeology, or in the field of geology, engineering or history. This individual should be recommended by the National OCTA President and agreed to by B2H Field Director.

Please share this communication at the upcoming comment meetings. Thank you for the opportunity to comment on the B2H Draft Project Order.

Patricia Traffas,
National OCTA President

July 27, 2019

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

Via EMAIL: B2H.DPOComments@Oregon.gov

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

Dear Chair Beyeler and Members of the Council:

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

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

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

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

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

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

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

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

Table C1: Summary of Proposed Borings; Map Sheet 36

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

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

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

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

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

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

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

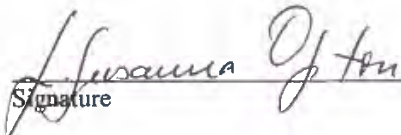
The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

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

I appreciate your consideration and your attention to this matter.

Sincerely,


Signature

G. Susanna Ogston
Printed Name:

Mailing Address: G. Susanna Ogston
96 3rd St
La Grande, OR 97850

References

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

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

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

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

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

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AUG 13 2019

DEPARTMENT OF ENERGY

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

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of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence. In other words, the cost of fencing an acre of lost forest land would exceed the value the applicant claims the land would add to the local economy per acre for the 50 years the transmission line is predicted to be in place.

The applicant also claims that the transmission line right of way through forest lands will not cause a substantial change in accepted forest practices or cause a significant increase in the cost of accepted forest practices on lands to be directly impacted by the Project or on surrounding lands. Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. Soil compacted by heavy equipment used to access the line will discourage regrowth.

The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line; it will increase costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require new access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission line, It will decrease the harvest along the transmission line due to tree loss along the corridor from wind and weather conditions impacting weakened root infrastructure once the transmission corridor is cleared.

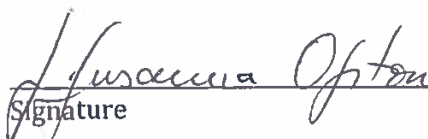
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, introduction of noxious weeds, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, decreased value of land if it is sold, long-term reduction in assessed value of the land, etc. The conclusions stated by the applicant in section 8.0 are false, absolutely without merit.

In addition, the applicant has failed to provide documentation to support their conclusions. The only reference the applicant cites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.


Signature

G. Susanna Ogston
Printed Name

Mailing Address: G. Susanna Ogston
96 3rd St
La Grande, OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

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: G. Susanna Ogston
96 3rd St
La Grande, OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

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.

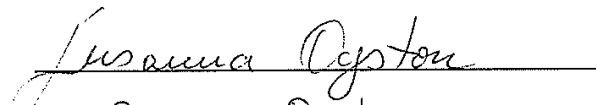
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (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: Susanna Ogston

Address: 96 3rd
La Grande, OR. 97850

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

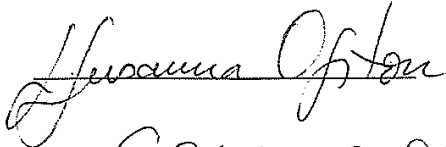
Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,



Name: G. SUSANNA OGSTOY

Address: 96 THIRD ST.
LA GRANDE, OR
97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

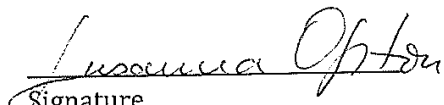
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant" (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38).
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, "Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary; 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,


Signature

Printed Name: Susanna Ogston

Mailing Address:

96 Third St.
La Grande, OR
97850

TARDAEWETHER Kellen * ODOE

From: SHEERAN Kristen * GOV
Sent: Monday, July 22, 2019 11:49 AM
To: B2H DPOComments * ODOE
Cc: BENNER Janine * ODOE; CORNETT Todd * ODOE
Subject: Letter in Support of B2H Draft Order
Attachments: B2H Letter.pdf

Dear Kellen,

Please add this letter to the official record of comments on ODOE's DPO on the proposed B2H project.

Sincerely,
Kristen Sheeran

Kristen Sheeran Ph.D.

Energy and Climate Change Policy Advisor to Governor Kate Brown
Director, Carbon Policy Office
775 Court Street NE
Salem, Oregon 97301
Kristen.Sheeran@oregon.gov
Cell: 971-240-0140
Office: 503-378-5145

Assistant: Miles Palacios
503-986-6543 (w)| Austin.M.PALACIOS@oregon.gov

KATE BROWN
GOVERNOR



July 21, 2019

Barry Beyeler, Chair
Energy Facility Siting Council
Oregon Department of Energy
550 Capitol St NE
Salem, OR 97301

CC: Kellen Tardaewether, Senior Siting Analyst

Dear Chair Beyeler and members of the Energy Facility Siting Council,

On behalf of Governor Brown, I am pleased to submit this letter in support of the Oregon Department of Energy's Draft Proposed Order recommending EFSC approval of the proposed Boardman to Hemingway Transmission Line (B2H). Governor Brown appreciates Idaho Power's due diligence in acquiring permits and collecting feedback from constituents over the course of the last decade to determine the most beneficial route for this important transmission line.

To facilitate utilities' transition from coal and fossil fuel resources to meet our state and regional climate and clean energy goals, the West requires new and upgraded transmission capacity to integrate and balance intermittent resources like wind and solar. B2H can help balance renewable resources across the West and relieve congestion on existing transmission lines in Eastern Oregon through connections with larger transmission lines across the West. Electricity customers in Oregon and across the Pacific Northwest and Mountain West will benefit as a result. The project can deliver clean energy in the winter months to the Northwest and give the Northwest's utilities and independent energy generators a path to sell excess energy to Mountain West customers during the summer. For these reasons, B2H is a critically important investment in maintaining a robust electrical grid while integrating clean, renewable energy resources across the Pacific Northwest and Mountain West states.

The B2H project is also an important driver of economic activity in Eastern Oregon. By relieving transmission congestion, the B2H project can bring new economic opportunities related to wind and solar development to the region. The construction of the project can also create jobs and expand the tax base in Eastern Oregon.

For these reasons, Governor Brown supports the proposed B2H project as a benefit to electricity customers, businesses, and local governments in Oregon.

Thank you for your thoughtful consideration of this important project.

Kristen Sheeran, Energy and Climate Policy Advisor to Governor Kate Brown
Office of Governor Kate Brown

TARDAEWETHER Kellen * ODOE

From: Andrea fry <andrea@ibew125.com>
Sent: Wednesday, June 19, 2019 8:32 AM
To: B2H DPOComments * ODOE
Subject: OSAEW Letter to support Boardman to Hemingway Transmission Line
Attachments: 20190612153819432.pdf

Hard copy to follow in the mail.

Thank you,

Andrea

IBEW Local 125

Oregon State Association of Electrical Workers

Gary Young
President
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15937 N.E. Airport Way
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busmgr@ibew48.com

Travis Eri
Secretary Treasurer
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banjo@ibew659.org

June 11, 2019

Mr. Barry Beyeler, Chair
Energy Facility Siting Council
200 City Center Circle
Boardman, Oregon 97818

Dear Chair Beyeler:

On behalf of the Oregon State Association of Electrical Workers and its 14,390 members who work, we offer the follow comments in support of the Boardman to Hemingway Transmission Line.

All Oregonians benefit from a stable economy; reliable, safe, and low-cost energy is the foundation of that economy. Our members work in varying classifications in the electric industry, and they live throughout the Pacific Northwest. The B2H Project is necessary for the Northwest and Intermountain West regions to make certain the electricity that our state depends on will be available when we need it.

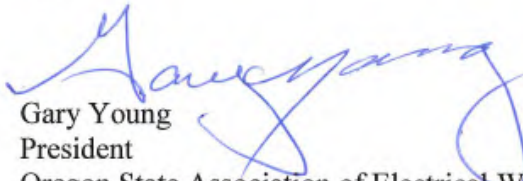
Oregonians have taken great pride in being a leader to shape discussion and policy on renewable energy. We have reduced carbon emissions while building renewable generation facilities, improving efficiency, and educating the public. No matter how well we do with reducing emissions, the need to have affordable, reliable, and safe power will not go away. The B2H Transmission Line is needed to ensure that occurs. To maximize the gains that have been made, the ability to transfer electricity between the Northwest and Intermountain West regions must be maximized.

There is no doubt that our members will have a direct benefit from the construction of this transmission line. We applaud the work that has been done by Idaho Power, Pacific Power, and Bonneville Power Administration to hear the public's concerns and propose a route that took environmental responsibility, cost, and efficiency into account. We know that a 500-kilovolt transmission line that is approximately 300 miles long will have a lasting impact beyond the construction phase, so this project is about more than immediate construction jobs to us.

B. Beyeler
June 11, 2019
Page 2

We respectfully offer our formal support of the B2H and hope that Oregon's Energy Facility Siting Council and appropriate federal agencies will issue their approval for the project. Please contact me if you have any questions about the OSAEW's position. Thank you for your consideration.

Sincerely,



Gary Young
President
Oregon State Association of Electrical Workers

Oregon State Association of Electrical Workers

Gary Young
President
IBEW Local 48
15937 N.E. Airport Way
Portland, OR 97230
(503) 256-4848
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June 11, 2019

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Energy Facility Siting Council
200 City Center Circle
Boardman, Oregon 97818

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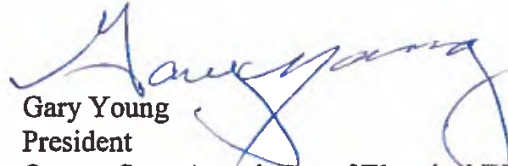
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B. Beyeler
June 11, 2019
Page 2

We respectfully offer our formal support of the B2H and hope that Oregon's Energy Facility Siting Council and appropriate federal agencies will issue their approval for the project. Please contact me if you have any questions about the OSAEW's position. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Young", is written over the typed name and title.

Gary Young
President
Oregon State Association of Electrical Workers

RECEIVED

JUL 10 2019

DEPARTMENT OF ENERGY

Verlyn D. Osborne
former OCTA board member and Kansas House of Representatives, 61st. District
1191 Granite Springs Rd. Lot 33
Cheyenne, WY 82009

July 4, 2019

Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon, 97301

RE: B2H Transmission Project public comments

There are two major issue that I am concerned with. The first issue is the fact that it has been stated that the Trail has been misrepresented on the maps. May I ask whose maps are we talking about. If its Idaho Power Company's maps, then I suggest that they be corrected by true Trail experts. The second issue is the statement made by the Idaho Power Company proposal that they will "try" to avoid damaging the Oregon Trail. We all know that once a Trail segment is damaged, it is impossible to repair that very important resource.

We all need to stand back and remember the long history of the Oregon Trail and how it has affected our country's history. OCTA has long attempted to protect this valuable resource and we challenge Idaho Power Company to join us in this preservation effort.

So, in this situation, we first need to make sure the maps are absolutely correct prior to any activity in the field and second is Idaho Power ready to spend the effort in conjunction with the Oregon-California Trail Association, in preserving our country's fantastic trail history? Finally, keep in mind, mediation is a process which is attempted after damage has occurred.

Sincerely,



Verlyn D. Osborne
former OCTA board member and Kansas House of Representatives, 61st. District

TARDAEWETHER Kellen * ODOE

From: SEVERSON Joe * OSMB
Sent: Monday, July 22, 2019 1:37 PM
To: B2H DPOComments * ODOE
Subject: Boardman to Hemingway Transmission Line

Attn: Kellen Tardaewether
Boardman to Hemingway Transmission Line Comments

Thank you for the opportunity to participate in the proposed Boardman to Hemingway Transmission Line project.

The Oregon State Marine Board (OSMB) is an advocate for recreational boating safety, navigation and access pursuant to Oregon Revised Statutes chapter 830 and Oregon Administrative Rules chapter 250. The Boating Facilities Program provides engineering services, technical assistance and grant funding for public recreational boating access facilities.

The Oregon State Marine Board comments are made in part based on a comprehensive review of the cumulative impact on recreational boating activities, public boating facilities, waterway rules, safety, conflict and congestion within the project area and potential impacts upstream or downstream.

The primary interests of the Oregon State Marine Board as they relate to recreational boating; include impacts to river navigation, construction timelines construction staging, in-water work, buoy placement, nighttime lighting, neighboring public boating facilities, placement of in-water structures, and placement of over-water structures.

Activities that would raise concern include: any staging of equipment at nearby boating facilities, any in-water work, any use of public boating facilities on or off the water, construction of infrastructure over boated waters, and changes in vertical and horizontal clearance that may impact river navigation and safety, among other activities planned that we may be unaware of.

Additionally, in-water construction activities have the potential to change or alter the geomorphology of the river; OSMB recommends a careful review for any impacts that may lead to scour, sedimentation or historical water elevations at any public boating facilities within or impacted by the Boardman to Hemingway Transmission Line.

OSMB recommends careful evaluation of activities that may impact boating facilities; including the historical and current recreational boating activities for safety, navigation. Given materials provided to OSMB and the current state in the planning process for the Boardman to Hemingway Transmission Line, OSMB is unable to fully ascertain direct or indirect impacts that may be of interest to OSMB. Therefore, the Oregon State Marine Board would like to remain informed on this planning process.

Thank you for this opportunity to comment and for including the Oregon State Marine Board in this planning process.

Joe Severson, GISP
Oregon State Marine Board
Planning and GIS Coordinator
Boating Facilities Program
503.378.2629



SERVING OREGON'S BOATERS SINCE 1959.

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" 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

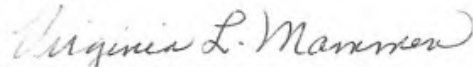
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

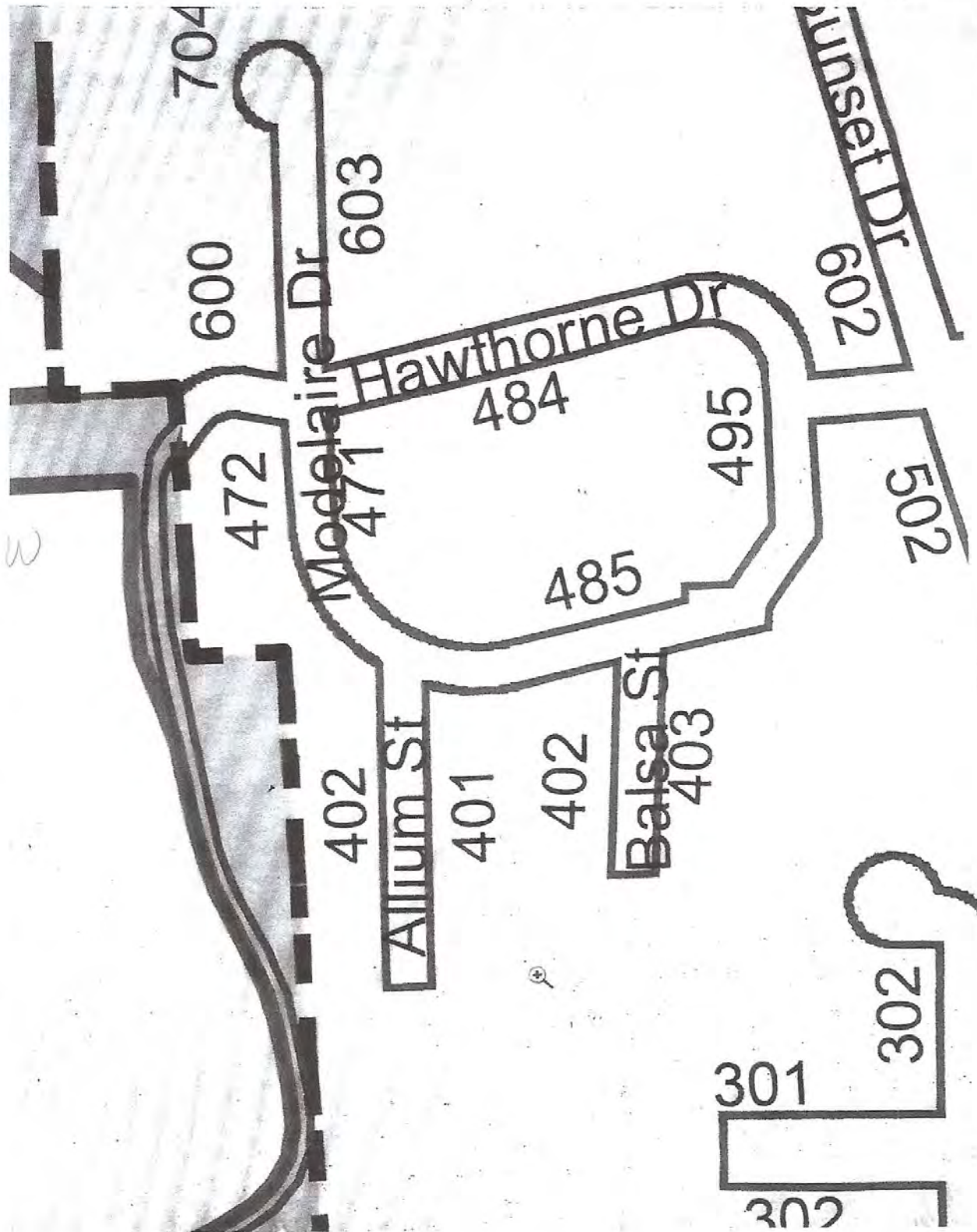


Exhibit 3

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.

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



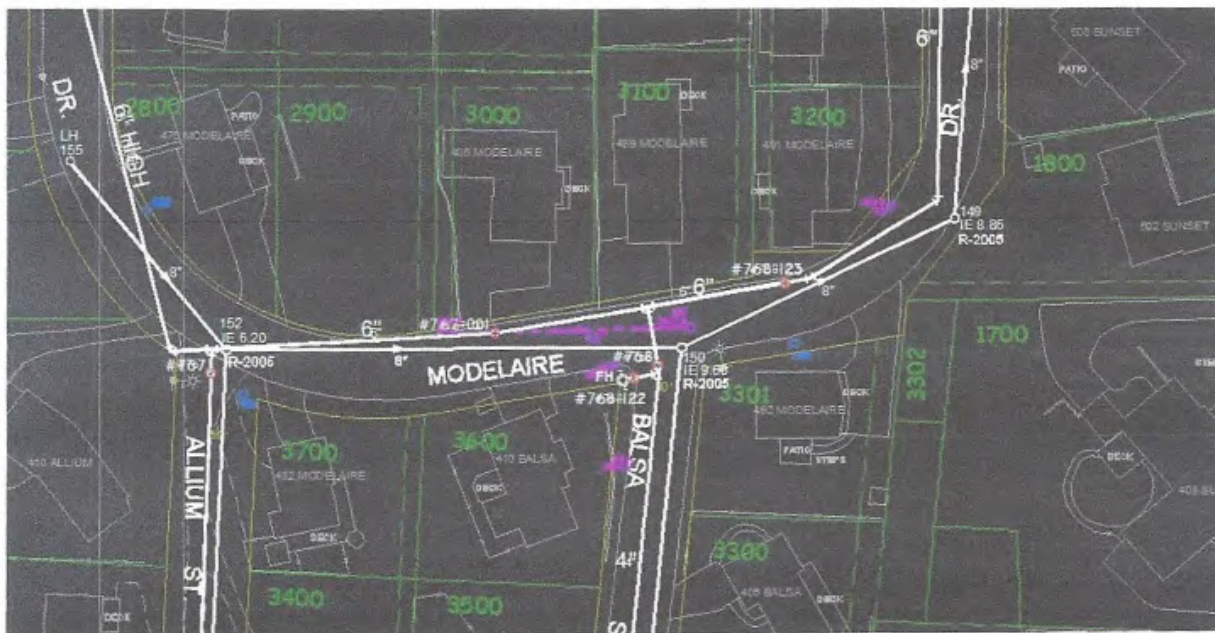
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

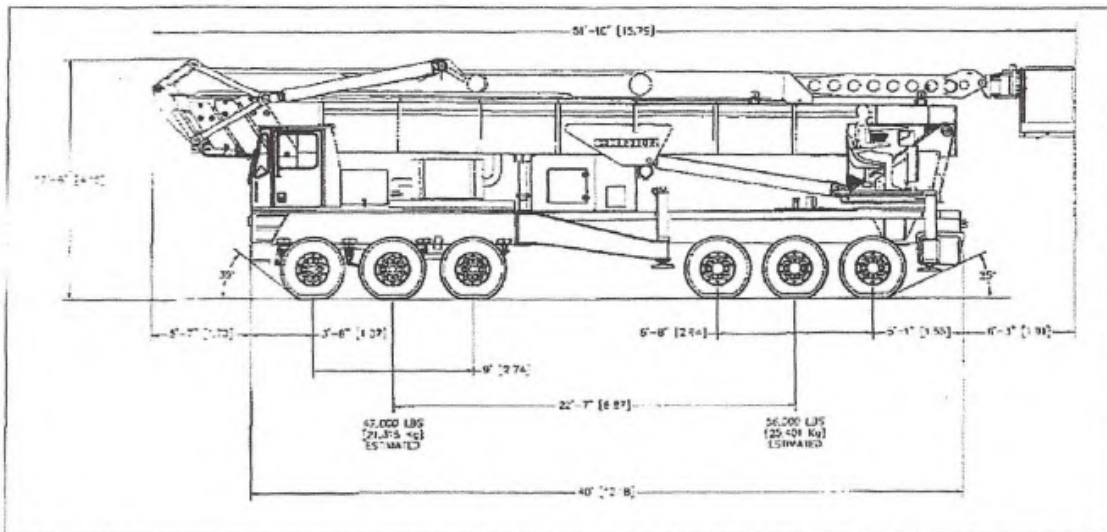


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

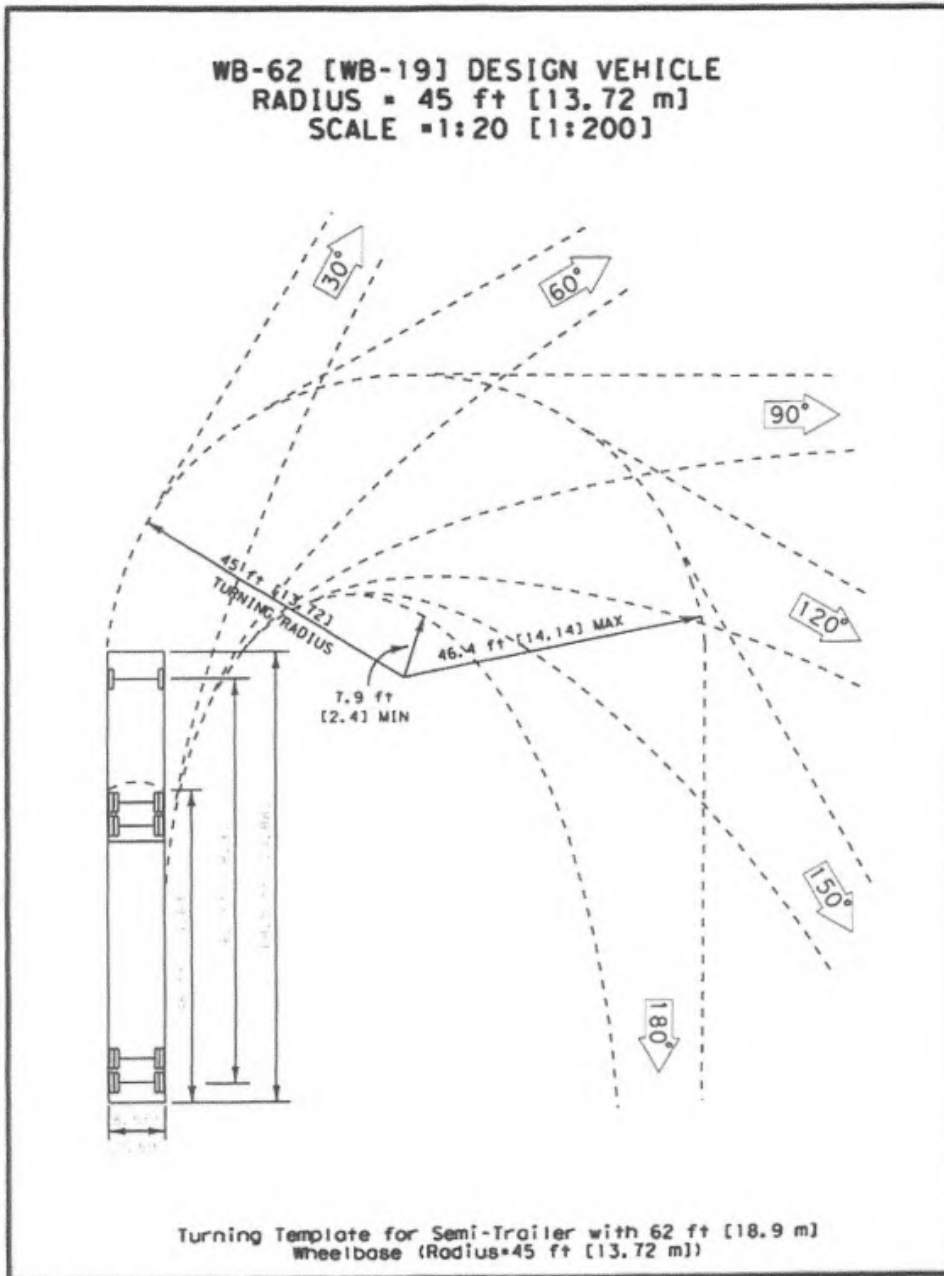


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

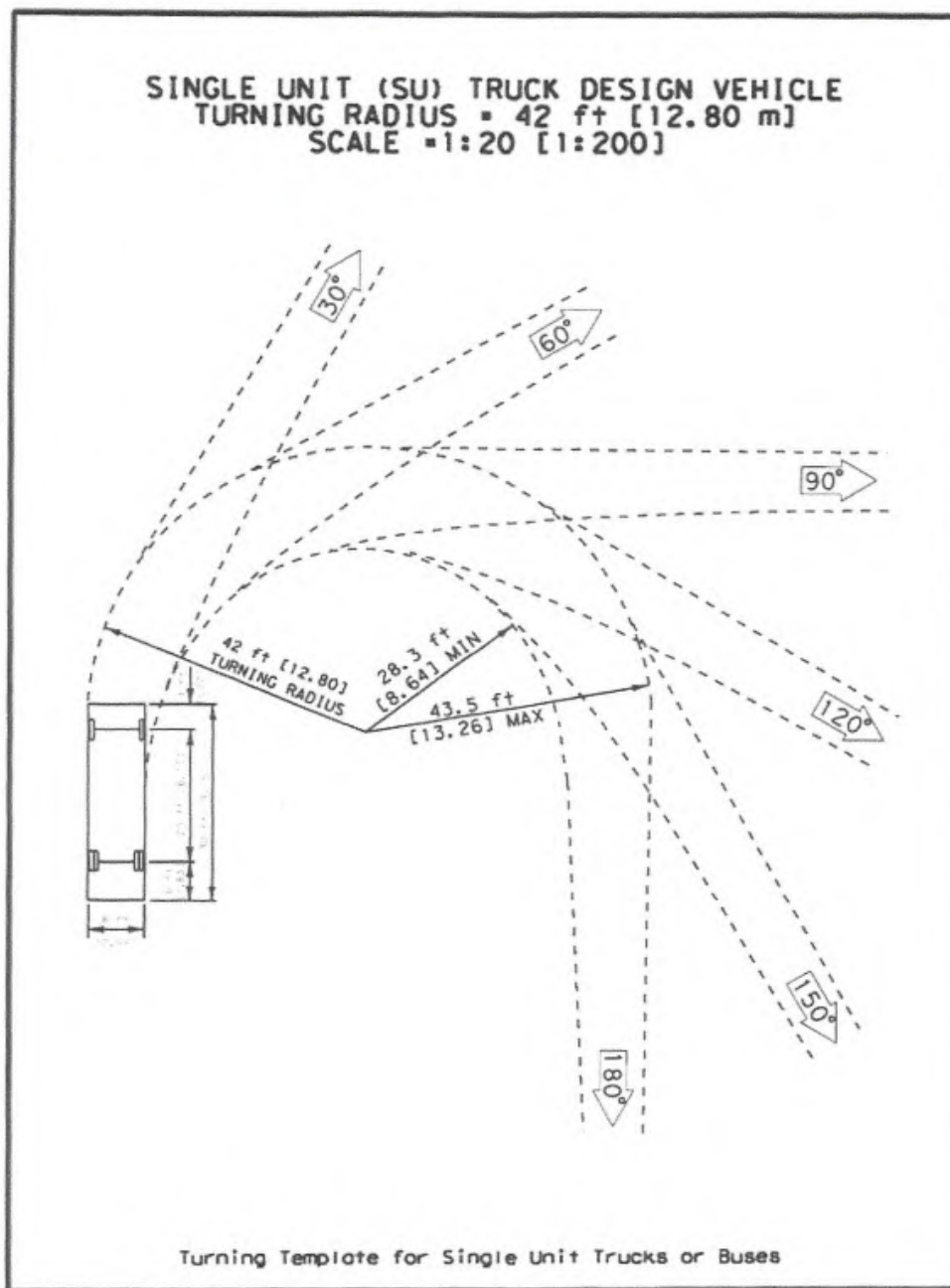


Exhibit 15

**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.

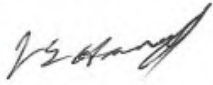
Section 17. TRUCK ROUTES

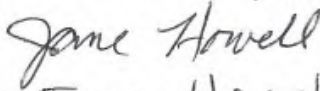
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

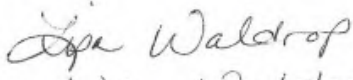
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

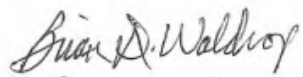
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

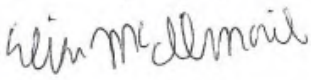
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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
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


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

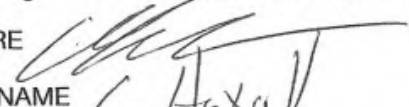

Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

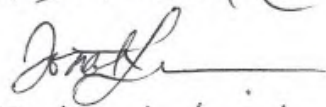

Chris Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

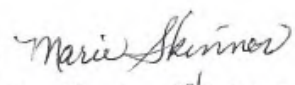

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

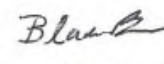

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

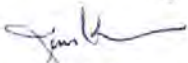
ADDRESS

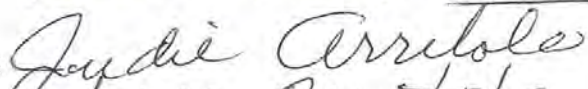
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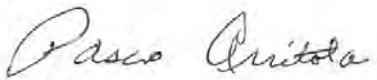

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

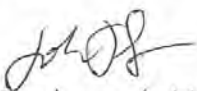
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SIGNATURE 
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SIGNATURE 
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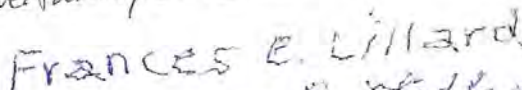
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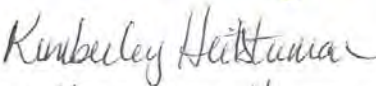
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SIGNATURE 
PRINTED NAME Frances E. Lillard
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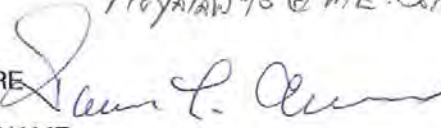
SIGNATURE 
PRINTED NAME Brent H. Smith
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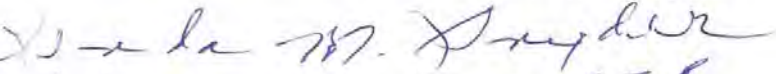
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
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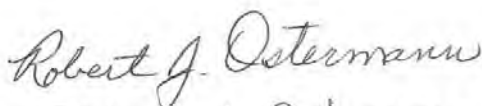
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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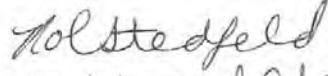
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
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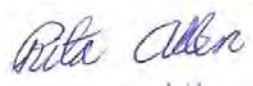
SIGNATURE 
PRINTED NAME Robert J. Ostermann
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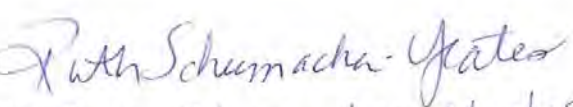
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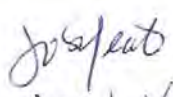
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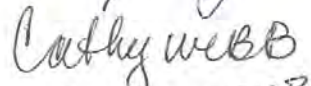
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

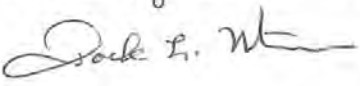
SIGNATURE 
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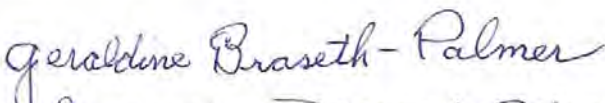

SIGNATURE 
PRINTED NAME JOHN YEATES
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SIGNATURE 
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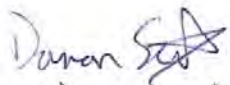
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SIGNATURE 
PRINTED NAME Jack L. Martin
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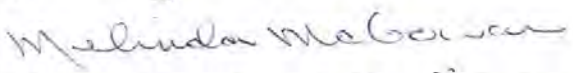
SIGNATURE 
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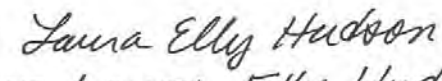
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SIGNATURE 
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SIGNATURE 
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SIGNATURE *Gary D. Pierson*
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SIGNATURE *Lynn Wheeler Duncan*
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I 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*
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EMAIL lindz_mm91@hotmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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SIGNATURE *Merle E. Comfort*
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SIGNATURE *Robin L. Maille*
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SIGNATURE *Carol S. Summers*
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SIGNATURE *Caroline Kaye Juniper*
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EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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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,

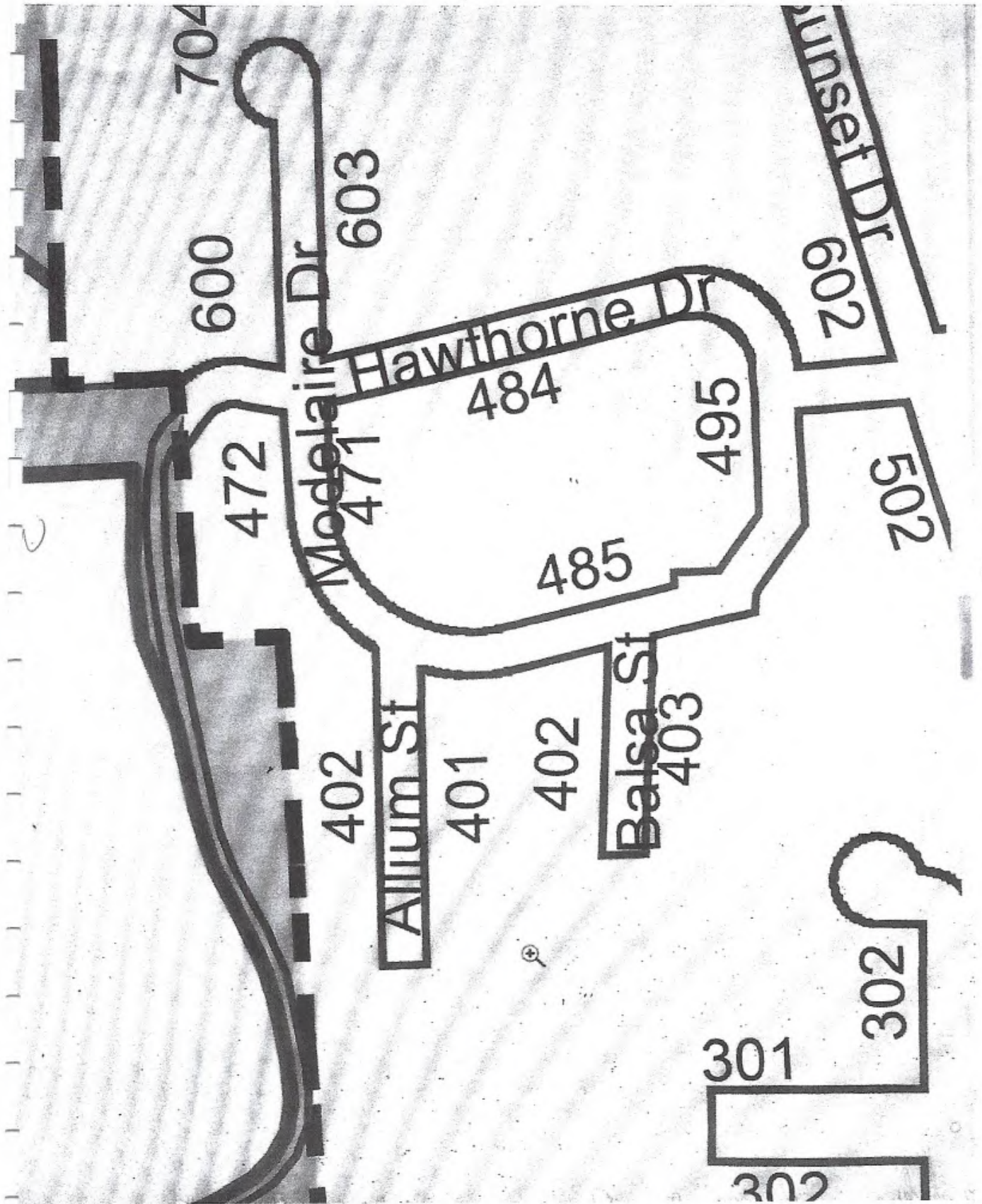


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



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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.



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.

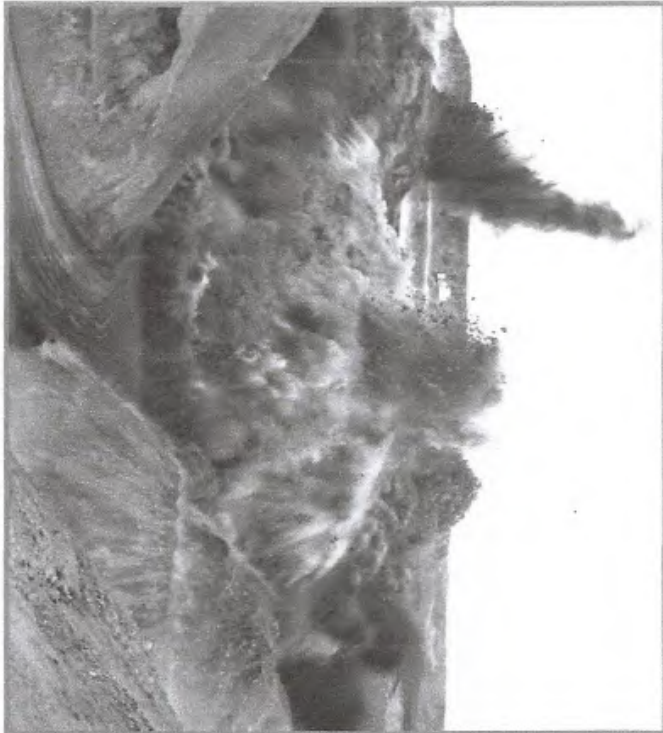
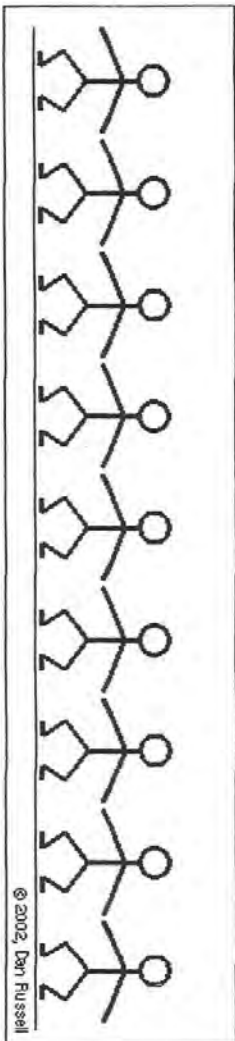


Exhibit 5b

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.

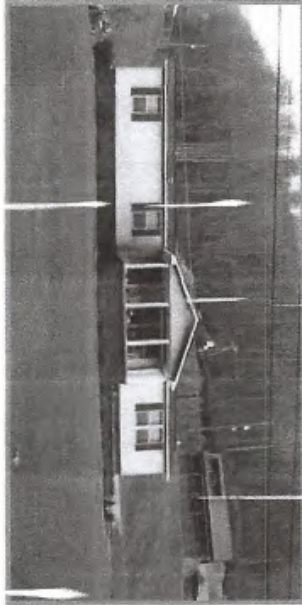
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

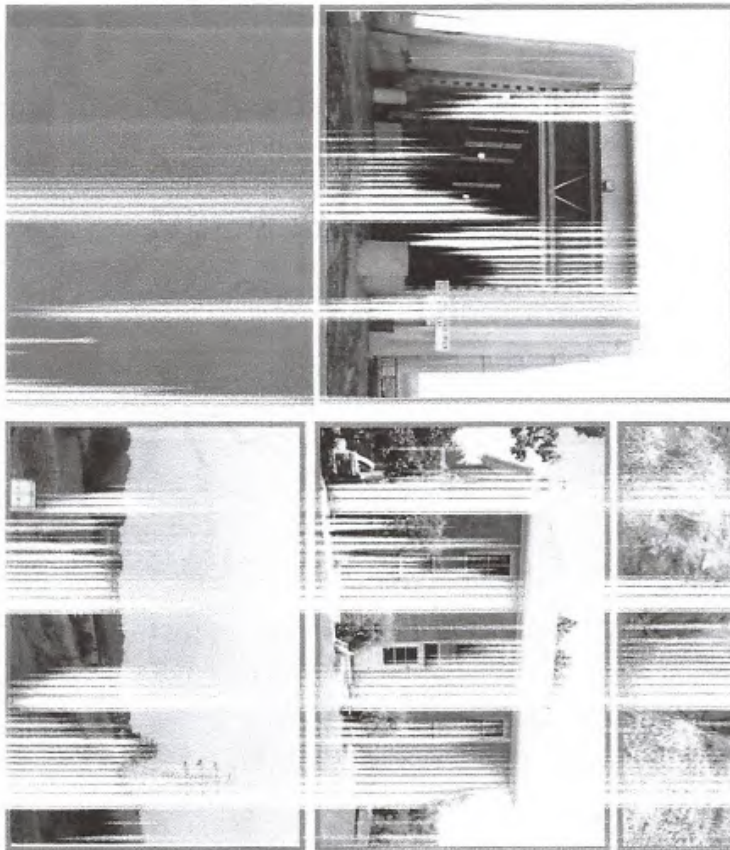
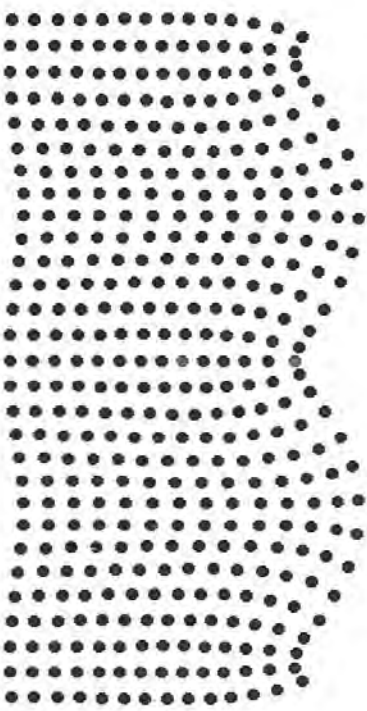


Exhibit 5D

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.



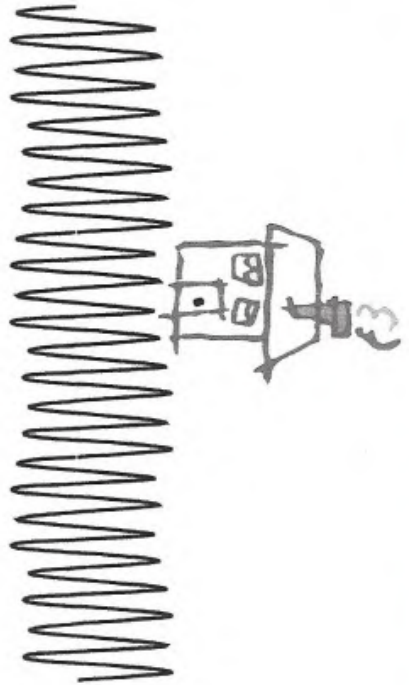
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Ground vibrations are measured in terms of **particle velocity** and are reported in inches per second (ips) or the speed at which a particle of soil or rock moves.

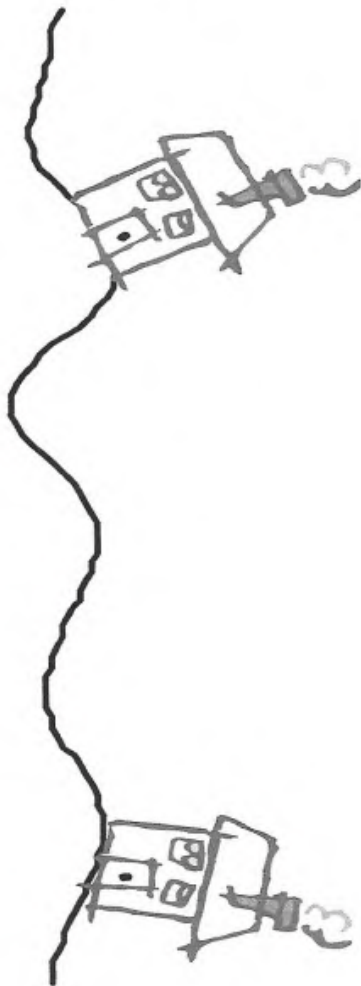
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

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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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

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

8/4/2019

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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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PMCID: PMC3757288

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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](#)

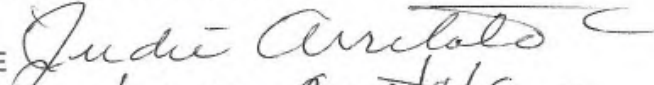


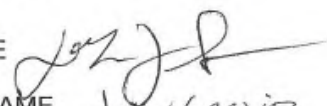
SCIENCE
NEWS


EXPERT
OPINION

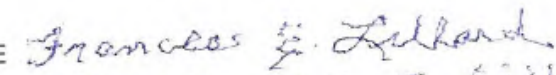
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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.

SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelane La Grande OR
EMAIL pjtolac@charter.net

SIGNATURE 
PRINTED NAME JOHN GARLITZ
ADDRESS 484 HAWTHORNE DR. LG, OR 97850
EMAIL

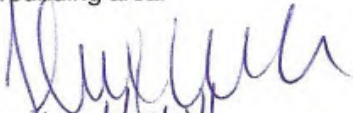
SIGNATURE 
PRINTED NAME Andrea Gulzow
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EMAIL foreverfamily33@adl.com

SIGNATURE 
PRINTED NAME FRANCES E Lillard
ADDRESS 471 Maxaire DR. LG
EMAIL

SIGNATURE 
PRINTED NAME C. Huxoll
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EMAIL CHRISHUXOLL@EMAIL.COM

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE



PRINTED NAME

Jessie Hutull

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JESSIEHutull@LIVE.COM

SIGNATURE



PRINTED NAME

Brent H Smith

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410 Allium St La Grande 97850

EMAIL

smithbrent@gmail.com

SIGNATURE



PRINTED NAME

M. Jeannette Smith

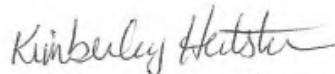
ADDRESS

410 Allium Street

EMAIL

jeannettecupton@gmail.com

SIGNATURE



PRINTED NAME

KIMBERLEY HETSTUMAN

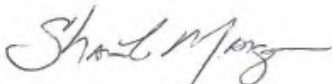
ADDRESS

2409 CENTURY LP, LA GRANDE, OR 97850

EMAIL

kimheitstuman@hotmail.com

SIGNATURE



PRINTED NAME

Shawn K. Mangum

ADDRESS

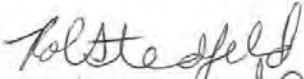
2409 E. M. Ave.

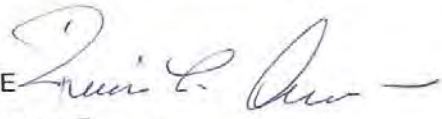
EMAIL

Hoyalaw95@me.com

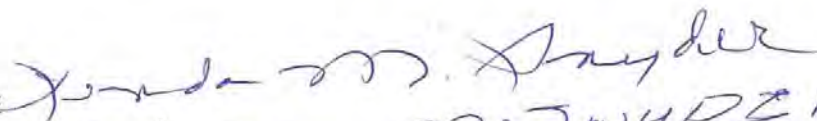
I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE 
PRINTED NAME 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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SIGNATURE 
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SIGNATURE 
PRINTED NAME Linda M. SNYDER
ADDRESS 491 17702 SHIRE
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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EMAIL

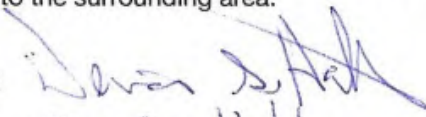
SIGNATURE *John Yeates*
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SIGNATURE *Ruth Schumacher Yeates*
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE



PRINTED NAME

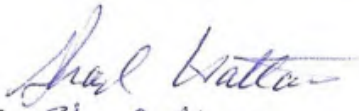
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

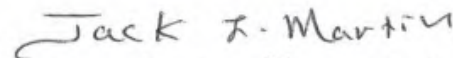
ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



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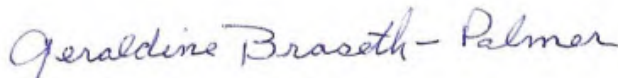
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



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GERALDINE BRASETH-PALMER

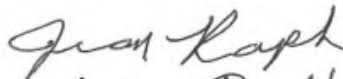
ADDRESS

1602 Gildcrest Drive - LaGrande, Or; 97850

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PRINTED NAME

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.

SIGNATURE *Damon Sexton*
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SIGNATURE
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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
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EMAIL thinkski@gmail.com

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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 *Lynn Wheeler Duncan*
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EMAIL rlwd1910@gmail.com

SIGNATURE *Gary D. Pierson*
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SIGNATURE *Joe Horst*
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Merle E Comfort*
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SIGNATURE *Gerald D. Juniper*
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EMAIL

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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
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SIGNATURE *Heather M. Null*
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EMAIL hnull@coni.com

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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

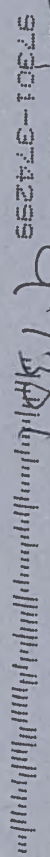
1112 1/2 Adams Ave
La Grande, OR 97850

POSTAGE WILL BE PAID BY ADDRESSEE
17 AUG 2019 PM 4 L



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 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: Robert J. Ostermann

Mailing Address: 495 Modelaire Dr.
La Grande OR 97850

Email: roboster5@gmail.com

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:53 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019
Attachments: Scan 2019-8-15 17.38.19.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter signed by me and 54 other residents of La Grande expressing our concerns regarding the B2H Project and we request that EFSC deny the Site Certificate.

I have also sent a bound copy of this material by the US Postal Service.

Sincerely,

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the usage of the "Local Streets" 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

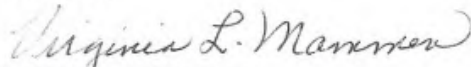
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

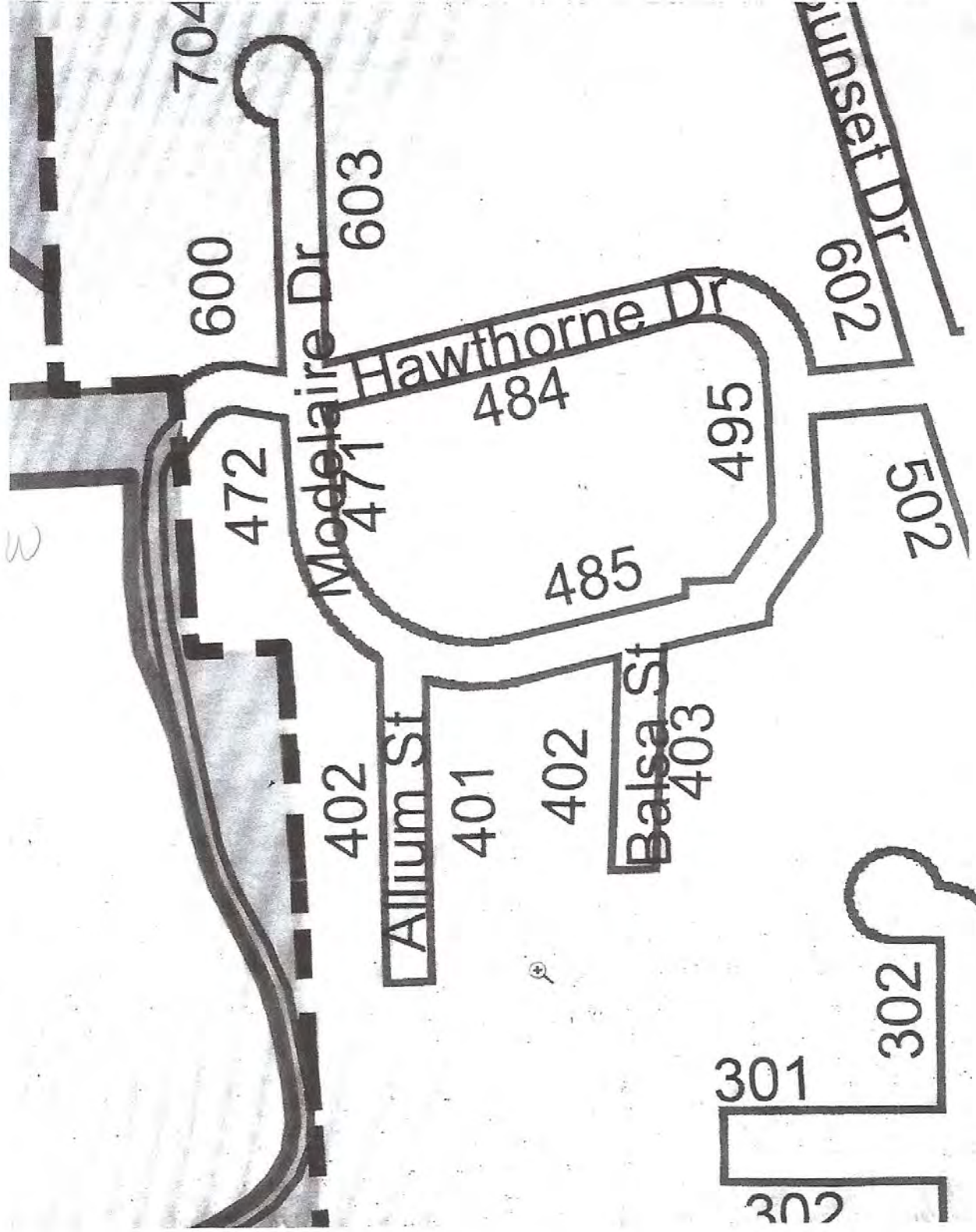


Exhibit 3

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



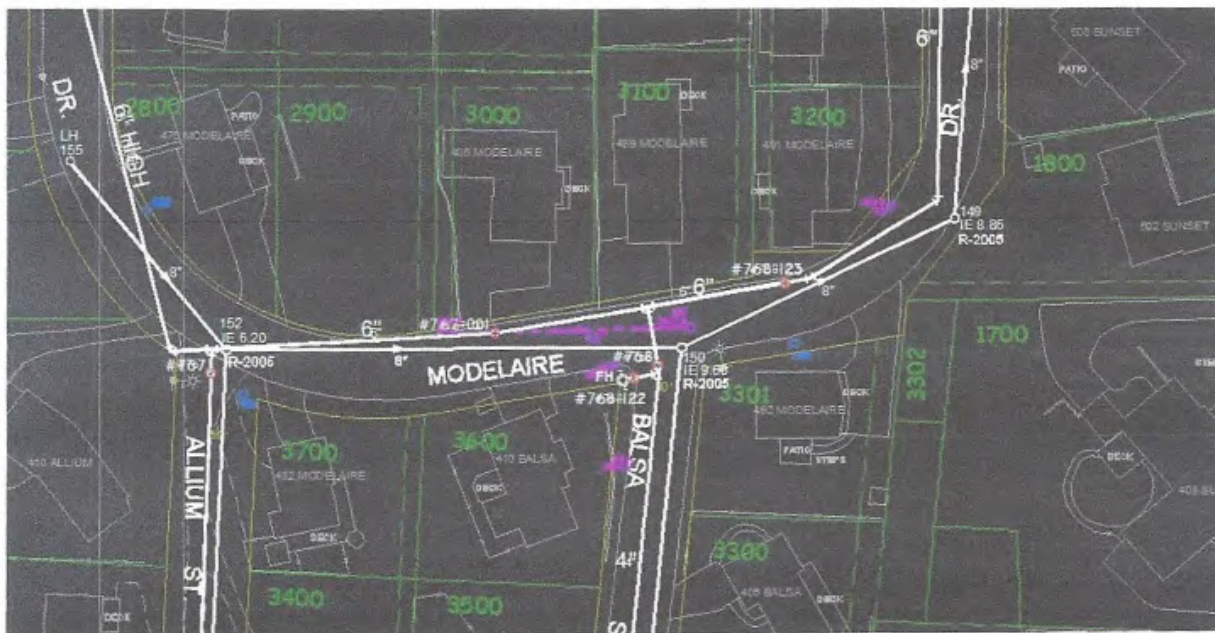
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

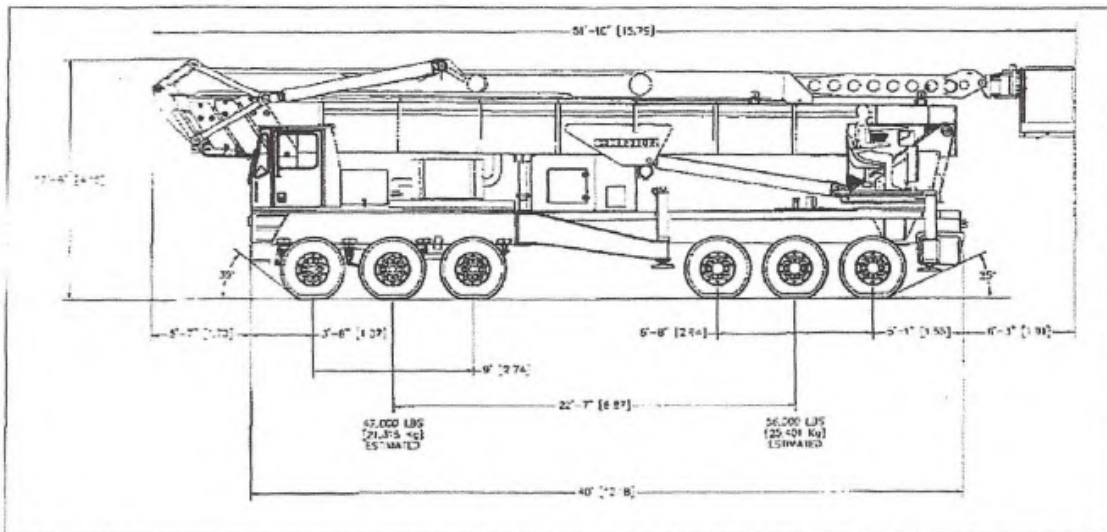


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

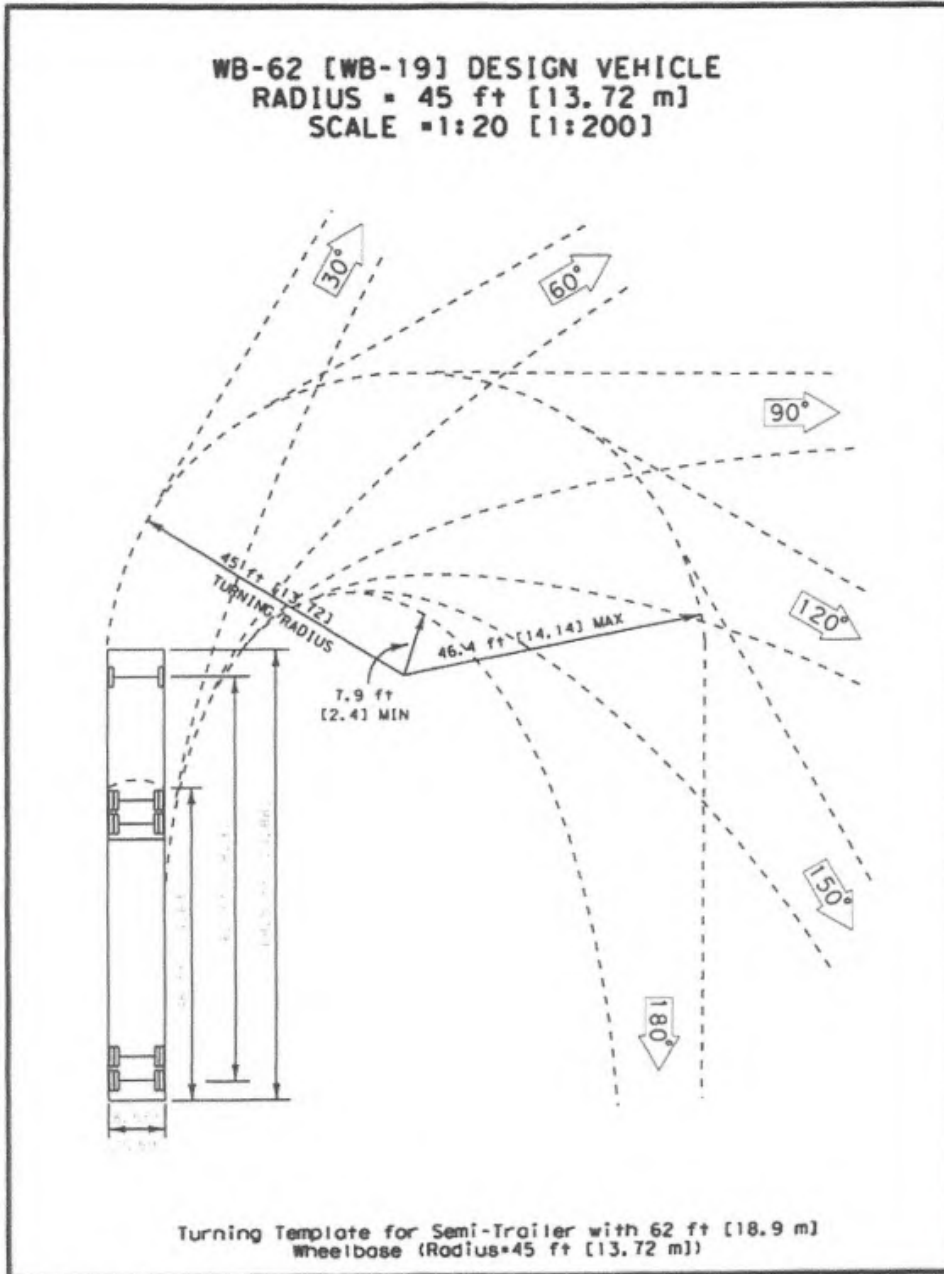


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

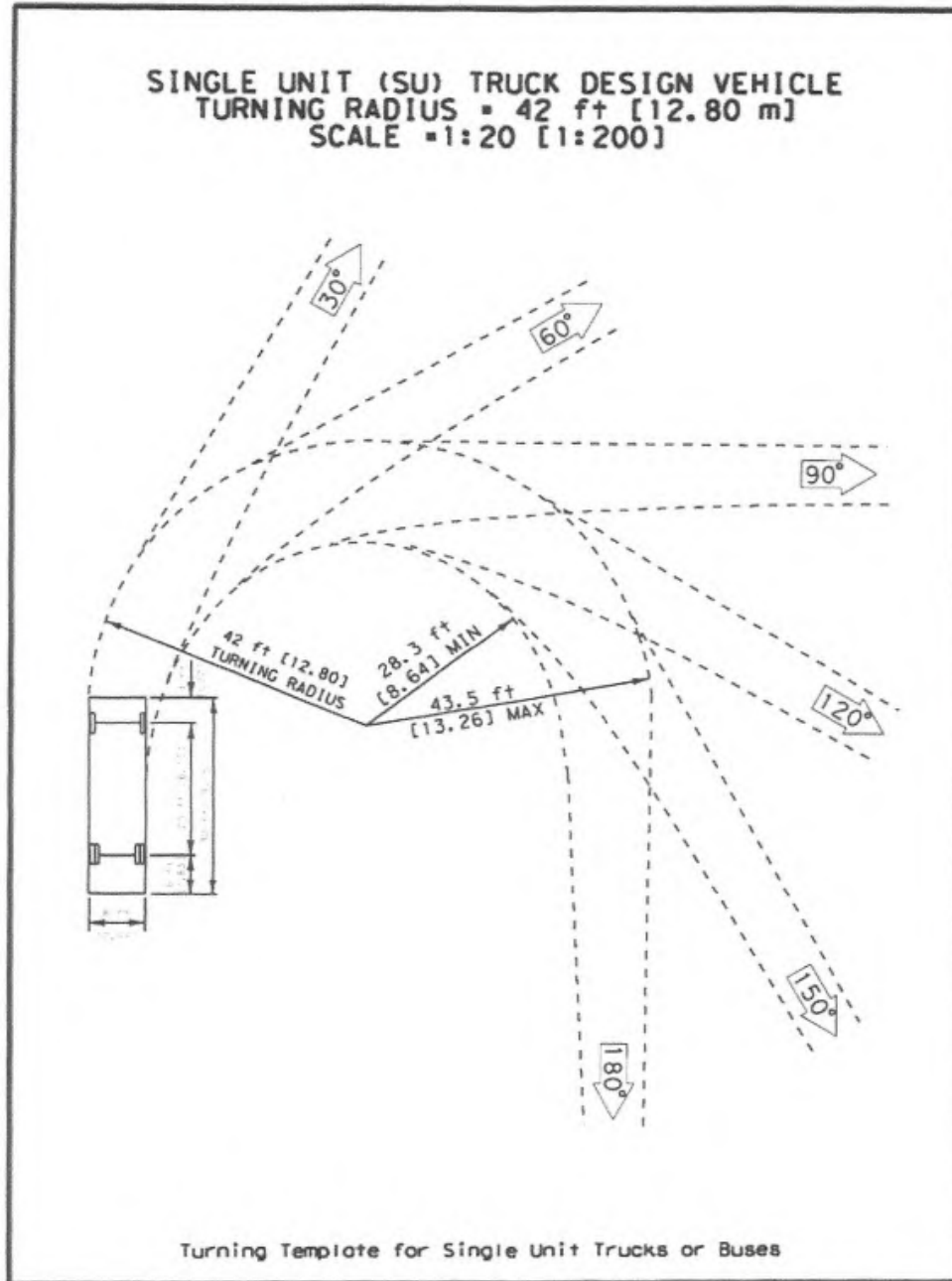


Exhibit 15

**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.

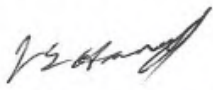
Section 17. TRUCK ROUTES

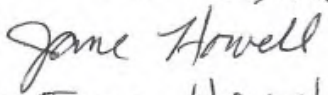
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

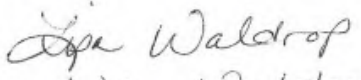
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

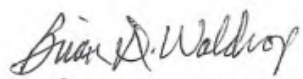
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

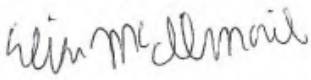
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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 mcilmail151@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

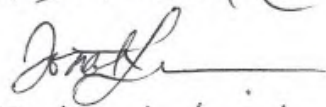

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

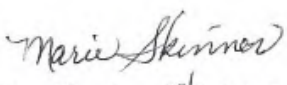

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

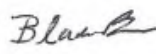

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

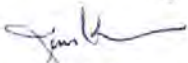
ADDRESS


EMAIL

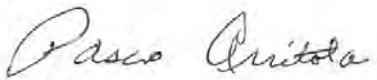

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

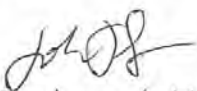
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@comi.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

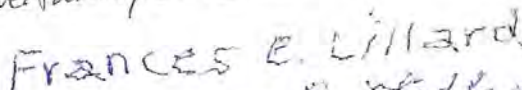
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande, OR
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SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL PSTOLA@CHARTER.NET


SIGNATURE 
PRINTED NAME John Bazuta
ADDRESS 414 Hawthorne LG, OR 97850
EMAIL

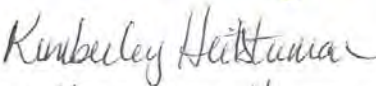
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

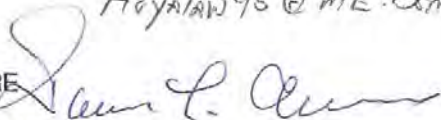
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrant@gmail.com

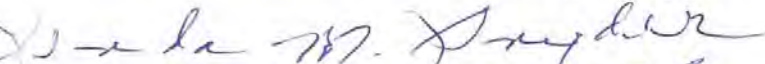
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

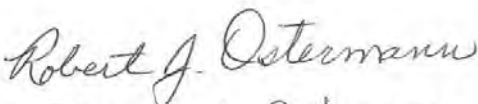
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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EMAIL Kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Lonnie L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

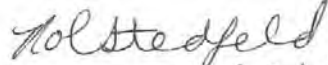
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL


SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

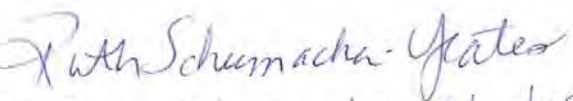
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

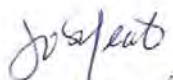
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
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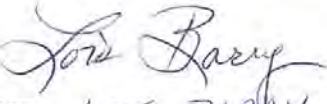
SIGNATURE 
PRINTED NAME Robin Stedfeld
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EMAIL rstedfeld@yahoo.com

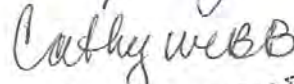
SIGNATURE 
PRINTED NAME Rita Allen
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EMAIL

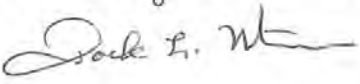
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
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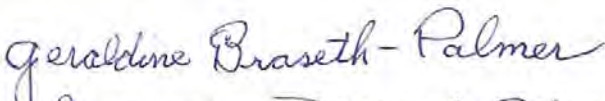

SIGNATURE 
PRINTED NAME JOHN YEATES
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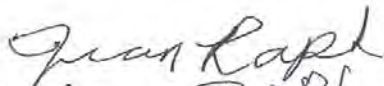
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SIGNATURE 
PRINTED NAME LOIS BARRY
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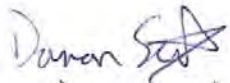
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

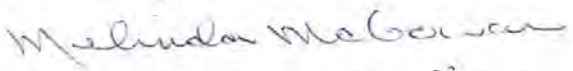
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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SIGNATURE 
PRINTED NAME Jean BAPH
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EMAIL Jraph19@gmail.com

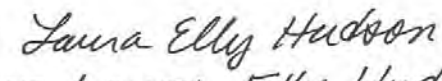
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SIGNATURE 
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SIGNATURE 
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PRINTED NAME Laura Elly Hudson
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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
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EMAIL v1wd1910@gmail.com

SIGNATURE *Anne G. Cavinato*
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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*
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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SIGNATURE *Bert R. Freewing*
PRINTED NAME Bert R. Freewing
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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*
PRINTED NAME Robin Maille
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SIGNATURE *Bruce C Kevan*
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SIGNATURE *Carol S. Summers*
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EMAIL carolsummers1935@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 NTH St. LaGrande - OR 97850
EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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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.

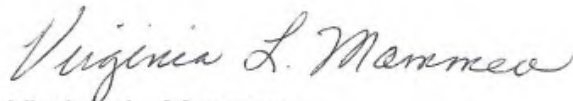
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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,

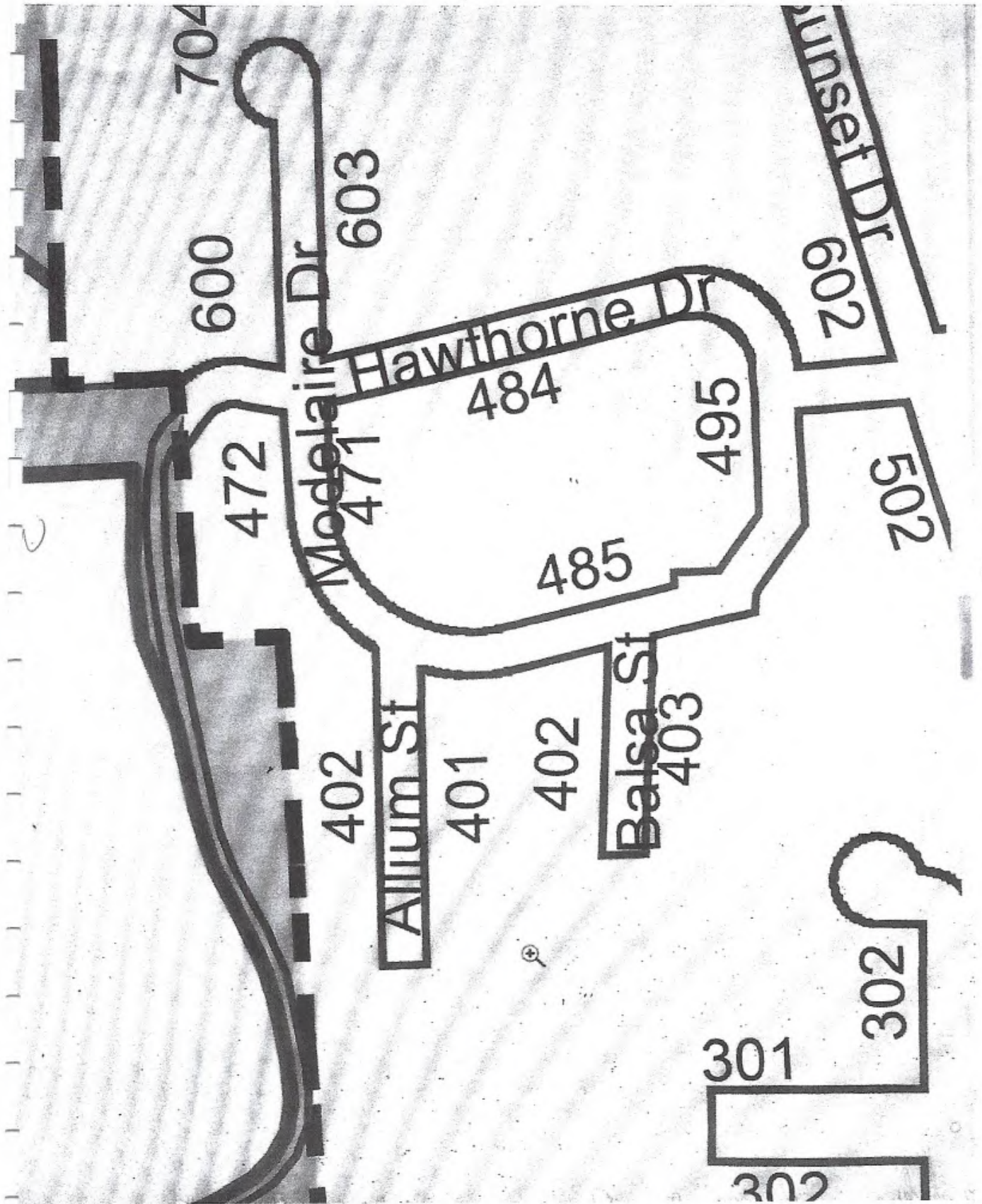


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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.

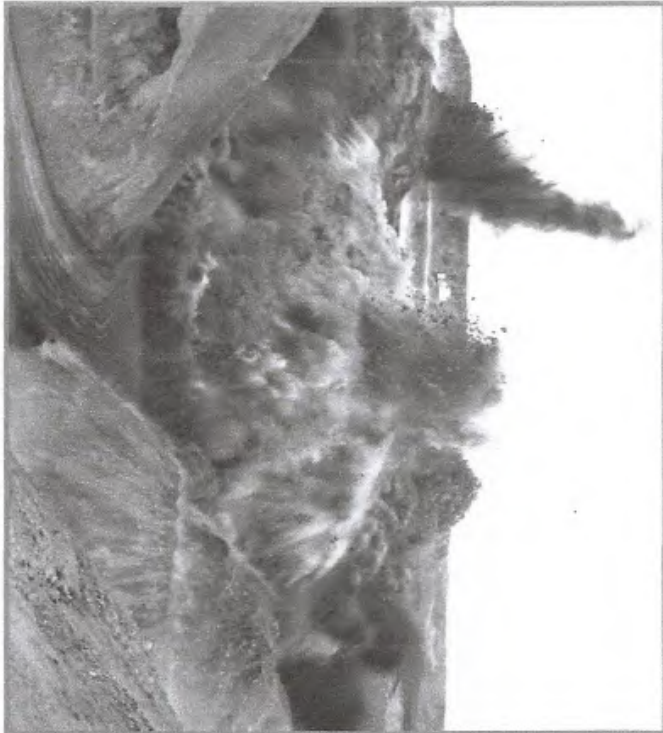
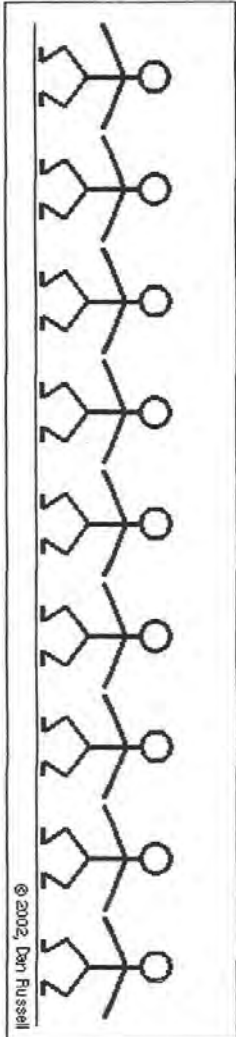


Exhibit 5b

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.

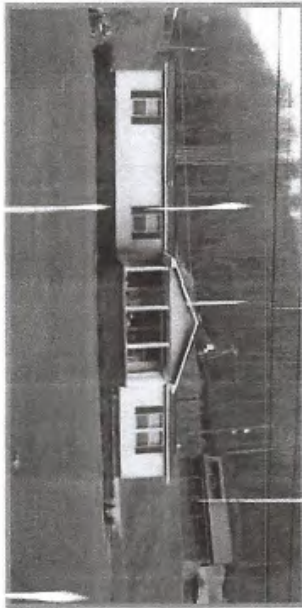
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

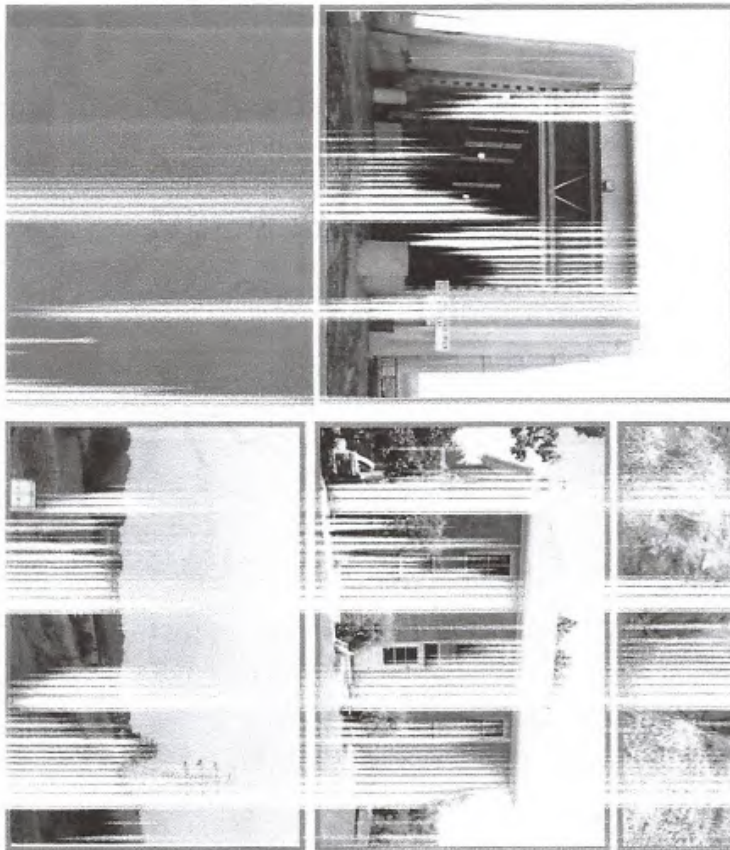
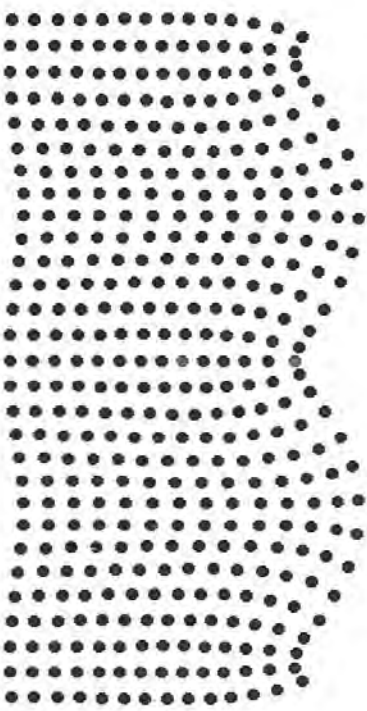


Exhibit 5D

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.



©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.

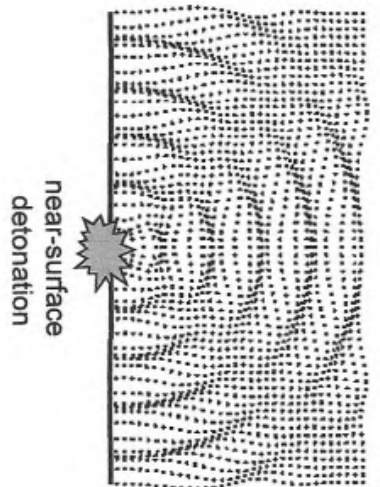
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

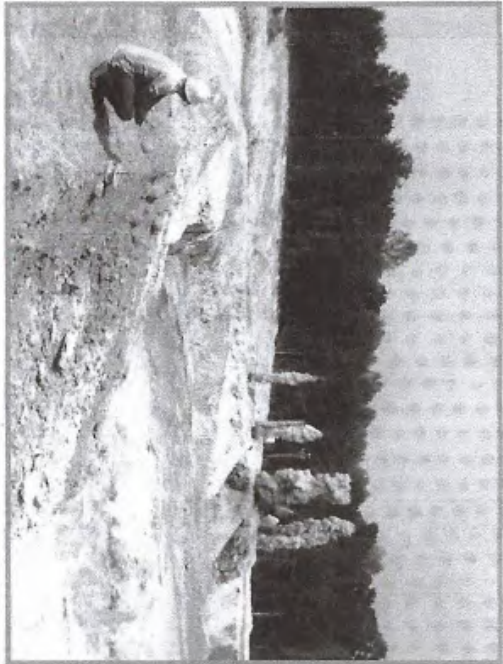
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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.



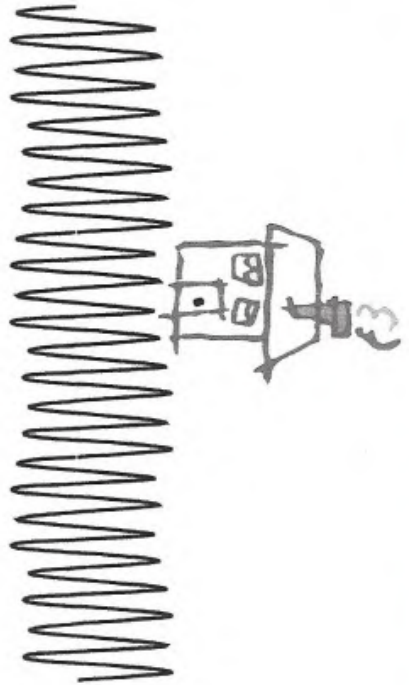
Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

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.

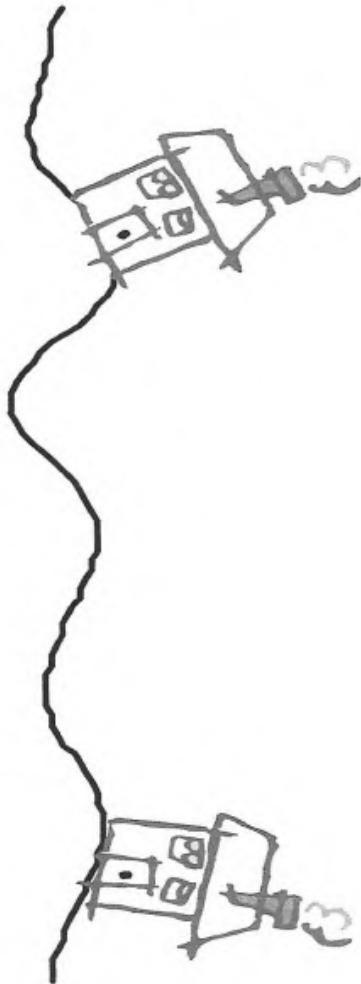


Ground Vibration Structure Response

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

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

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



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PMCID: PMC3757288

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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](#)

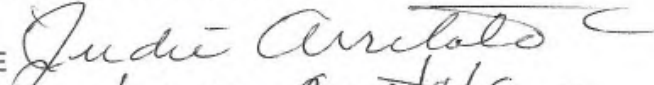


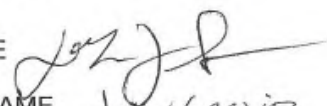
SCIENCE
NEWS


EXPERT
OPINION

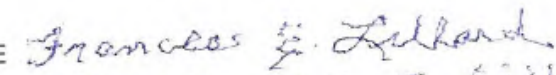
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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.

SIGNATURE 
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SIGNATURE 
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Shawn K. Mangum

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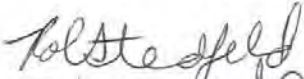
2409 E. M. Ave.

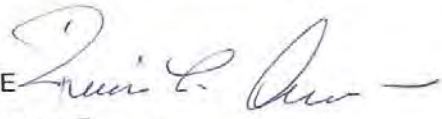
EMAIL

Hoyalaw95@me.com

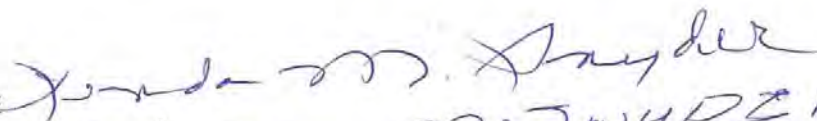
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EMAIL N/A NONE:

SIGNATURE 
PRINTED NAME Rita Allen
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SIGNATURE 
PRINTED NAME Linda M. SNYDER
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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 *Robin J. Ostermann*
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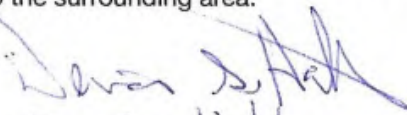
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SIGNATURE *Ruth Schumacher Yeates*
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SIGNATURE *D. Dak Mammen*
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE



PRINTED NAME

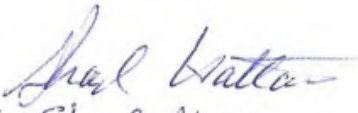
Denise Hattan

ADDRESS

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EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

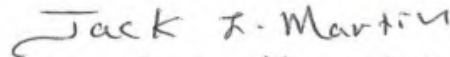
ADDRESS

507 Sunset Dr

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hattansl88@gmail.com

SIGNATURE



PRINTED NAME

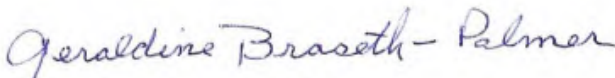
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



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GERALDINE BRASETH-PALMER

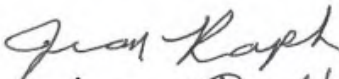
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PRINTED NAME

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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SIGNATURE *Lois Barry*
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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 *Lynn Wheeler Duncan*
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Merle E Comfort*
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SIGNATURE *Caroline Kaye Juniper*
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EMAIL

SIGNATURE *Gerald D. Juniper*
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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*
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EMAIL jeanfrewing@gmail.com

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EMAIL

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PRINTED NAME
ADDRESS
EMAIL



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Ashley O'Toole

Mailing Address (mandatory) 2 1/2 Depot Sq. #A
La Grande, OR 97850

Phone Number (optional) (541) 663-7187 Email Address (optional) asootoole1985@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 114

1 impossible. We have families, we have jobs. We can't
2 afford litigation. A lot of us, I can't speak for
3 everybody, but I know I can't. This whole process is
4 the sacrifice of a few to serve the many. It's a
5 divide-and-conquer approach. It's not right.
6 I have to answer the questions of my kids
7 almost every weekend when we work the property, when we
8 go to hunt, hike, whatever it is that we do. Why does
9 that power line -- meaning the existing power line --
10 why does that exist? I don't know, that was before my
11 time, but it's here. What are we going to do if another
12 one comes through? I don't know. Dad, how is this
13 legal, how can they take our property? I don't know.
14 Imagine that for a second, trying to answer a
15 9-year-old boy of how you can have property and people
16 just take it. It's impossible.
17 I feel like the Council should take into
18 account the ability of the average person to be able to
19 comb through this paperwork and to present an articulate
20 argument which is being requested and demanded of us.
21 It's impossible. The Council should take into account
22 the average person's ability to understand and to
23 articulate this.
24 So ORS says that we have to cite certain
25 things; recreation, hunting, hiking. Hiking the Oregon

Page 115

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

Page 116

1 Tweit.
2 MR. ASHLEY O'TOOLE: Hi. My name is Ashley
3 O'Toole. I live at 2 1/2 Depot Street in La Grande.
4 Thank you to the Council for being here and staying here
5 with us to the bitter end and hearing what we all have
6 to say. I appreciate that.
7 I'll start with referencing a letter To the
8 Editor that appeared in "The Observer" that I wrote. It
9 was published online on March 7th of this year, titled,
10 "Nothing to gain, everything to lose: B2H Transmission
11 line is obsolete and devastating." I am just going to
12 read a few excerpts and sort of expand on a few of the
13 points.
14 "The B2H transmission line is a 20th century
15 solution in search of a modern problem that doesn't
16 exist. It's wasteful, obsolete and potentially
17 devastating."
18 La Grande has nothing to gain from this
19 project and everything to lose. It will ruin our
20 surrounding ecosystems, our hunting and recreational
21 grounds, and our historical sites, our property values,
22 our view of the surrounding mountains and our ability to
23 effectively protect ourselves from devastating
24 wildfires. All of this, to help a private corporation's
25 customers in another state receive hydropower originally

Page 117

1 intended for our state and Washington.
2 Since 2009, at least 12 similar proposals
3 across the country for these new high-voltage
4 transmission lines have been denied, and they have been
5 replaced by more cost-effective solutions.
6 I think that is it from the article. But as
7 you can see, I'm definitely of the Stop B2H crowd, not
8 move B2H crowd. So we hear people complaining about
9 this route or that route. Let it be clear, we really
10 are Stop B2H. I want to touch on a few points I think
11 from both of those routes, proposed routes.
12 I think I wanted to, at least first ask, just
13 because I'm not familiar with how long the Council has
14 been in town today or yesterday or tonight or tomorrow
15 morning, but I'm sure we have read the proposals, I'm
16 sure we have reviewed the engineering plans and
17 elevations and things. My question is: Perhaps, have
18 you yet physically been on Morgan Lake Road or do you
19 intend to be on Morgan Lake Road as you research this?
20 I think the points I wanted to make were how
21 steep it is and how sharp of turns those are, and I
22 understand that there could potentially be a mitigation
23 plan to that effect. I would love to see where in the
24 proposal in writing Idaho Power is really going to be
25 compelled to reach certain minimums with the municipal,

Page 118

1 the effectiveness of how these in town, along the route,
2 both at the county level and the city level.
3 Specifically when we talk to residents on the
4 Modelaire and Hawthorne Loop, which is in the city
5 limits, you guys want to try -- I should say Idaho Power
6 would love us to just kind of swallow this Morgan Lake
7 route in exchange for, what was it, \$100,000 to make the
8 park a little prettier? It doesn't make the towers go
9 away. It really doesn't.
10 I wanted to -- let me kind of continue to
11 expand on a few other points though. You may have also
12 already seen what we call the "mock tower," that sort of
13 model of the tower up on the hill facing town. That is
14 pretty darn close to where one of the proposed towers
15 will be on the Mill Creek route.
16 By my calculation and guess, if I was standing
17 in the middle of the south side of La Grande, say, on
18 the EOU football field, we will see about 13 towers,
19 plus or minus 1 or 2. I would love to be proven wrong,
20 but I have not seen any renderings from Idaho Power of
21 what this is going to look like. Surely in their master
22 plan that they are trying to sell to you an engineer has
23 put together an elevation of a view of what these things
24 are going to look like from certain points of view
25 overhead and so on.

Page 119

1 If they are so proud of the line, why have
2 they not shared this, why are we guessing what it could
3 look like from a visual standpoint?
4 I think one of the other points I wanted to
5 make was, we are sending this power over there. Idaho
6 Power did announce that there is going to be a new solar
7 plant come online, 120 megawatts just south of Twin
8 Falls. This kind of speaks to what Mr. Cimon was
9 talking about with this paradigm shift. That is solid
10 evidence of that concept, and it's announced and
11 probably touted by the same energy corporation that is
12 touting the archaic solution to the same problem.
13 So we have not seen the power demands in Idaho
14 follow the trends that they hoped they would see. The
15 population didn't grow like we said it would, people are
16 moving to more energy-efficient appliances and light
17 bulbs and smart meters. So how can you tell me 2026,
18 when this thing is scheduled to come online, that we are
19 going to need it.
20 I would love Idaho Power -- I just need to see
21 more proof from them that they actually need this line 5
22 years from now, 7, geez, 7 years from now, Matt. So
23 that's another point.
24 I think another point I'd like to touch on
25 here real quickly, looking at the time here especially,

Page 120

1 I am a real estate agent. And a point that hasn't
2 really been brought up very much, I think the Mayor
3 briefly mentioned that property values that are going to
4 be affected. As a real estate agent, I've already seen
5 this in our town. If you guys are interested, there is
6 a listing on Gekeler Lane right now, directly underneath
7 the 230kV line, where we currently get our power, that
8 listing agent has told me that that house was on the
9 market for most of last year with no success. Here we
10 are back in the selling season, it's still sitting on
11 the market with no success.
12 I can tell you with firsthand evidence, 2
13 years ago I sold a house that was on the market for 4
14 years because it was underneath the 230kV line.
15 So we are not just talking about home values,
16 but also just marketability, sellability. I mean,
17 people pull up on the driveway and they see the giant
18 power lines and they turn around. It's over.
19 There are many, many citizens on Morgan Lake
20 Road, Wood Road, and Marvin Lane, Modelaire and
21 Hawthorne, that are going to be dealing with this, and
22 Idaho Power's attempt to give them a one-time cash
23 payment for an easement to make them go away, it's not
24 going to work for the next generation, it's not going to
25 work to help sell that property down the line. There is

Page 121

1 going to be a very real effect on property values for
2 many, many of our citizens along the route.
3 The last point I wanted to make was about the
4 blasting in the geological hazard zone. Again, as a
5 real estate agent, I can give you evidence of a home on
6 Modelaire that was affected by recent blasting from
7 Grande Ronde Hospital. The hospital put in a parking
8 lot, they had to demolish or blow away a lot of earth.
9 When I submit my written statement -- I see my
10 time is up. When I submit my written statement to you,
11 I will demonstrate evidence from a home inspection
12 immediately before and after of a 3-inch crack in that
13 foundation that formed. Of course, correlation is not
14 always causation, but it's a pretty sure thing. It has
15 something to do with all the damn dynamite that was
16 going on for months and months right across the street.
17 Don't let them blast in the geological hazard
18 zone. You are asking for landslides, you are asking for
19 a lot of other dangerous things.
20 I've got more to talk about, but I want other
21 people to speak. Again, I really thank you all for
22 coming out this evening. Have a good night.
23 HEARING OFFICER WEBSTER: I don't know yet if
24 the Applicant wants to make any statements tonight or
25 not, but let me know.

Ashley O'Toole

road damage. no written
promise of repair.

How do we know these
aren't empty promises?

→ Has council traveled ML road?

- you've seen elevation map +
engineer plans but have you actually
seen it?

demand in 2026?

housing market ^{Blasting etc} \leftarrow quite showing
less values

Renderings?

Solar Plant in Idaho
south of twin Falls 120 MW

Fire mitigation - no project is best

dynamite in geo hazard
Hawthorne etc.

approx 12 towers visible from
cow football field. Renderings?

Fire
@

Stop, not move

August 14, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

Via E-MAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project
9/28/2018; Draft Proposed Order 5/23/2019

To: Chairmen Beyeler and Members of the Council

I appreciate the opportunity to comment on the B2H Draft Proposed Order. The Oregon National Historic Trail will be significantly affected by the B2H Transmission Line.

The Draft Proposed Order identifies significant impacts to the Oregon Trail in several Exhibits, including Exhibit C: Property Location and Maps; Exhibit L: Protected Areas; Exhibit R: Scenic Aesthetic Values; Exhibit S: Cultural Resources; Exhibit T: Recreational Facilities; and Exhibit X: Noise.

B2H crosses the Oregon Trail at least 8 times. EFSC has done a reasonable job of protecting the Trail during construction and operation, if the proposed requirements are followed, **except at the Oregon Trail Interpretive Center at Flagstaff Hill.**

The B2H Transmission Line should be buried for approximately 2 to 2 ½ miles to comply with the exhibits indicated above. Idaho Power has from the early years refused to do any significant analysis for this option. IPC uses cost as the reason for stating that undergrounding is not feasible. Cost is not a specific standard, and costs are the responsibility of the Oregon Public Utilities Commission during rate considerations. EFSC has determined that IPC has the Financial ability even if some partners choose to not participate, so reasonable cost should not be a determining factor for EFSC.

EFSC should refuse to approve the Draft Project Order for the following reasons:

1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center and hiking trails noise will be disturbing. Map 23 in Attachment X-1 does not even show the Oregon Trail.
2. Within OAR 345-022-0040 Protected Areas and ODEQ standards 340-035-0000-0100, this area should have been monitored and modeled as a Noise Sensitive Property and was not.
3. Does not comply with Scenic Values from the Blue Mountains Parkway and Oregon Trail Interpretive Center. The OR 86 encourages drivers to STOP and read interpretive signs, so viewer perception and resource change cause significant decrease of scenic values. IPC says no significant impact.
4. The DPO does not comply with Exhibit L Protected Areas. The BLM ACEC at Flagstaff Hill has not considered undergrounding for the protection of the Oregon Trail. No analysis found the pristine, Class 1 swales of the Oregon Trail within the ACEC located at: Lat 44.813762 Long -117.750194 or 44° 48'


48.26°N 117° 75' 57.97°W. IPC proposes to build a new constructed road over the Oregon Trail in the area identified in the location above.

5. The DPO does not meet the standards required for Exhibit T Recreational Facilities, OAR 345-022-0100, especially at the Flagstaff Hill interpretive center, because of:
 - a. It is a BLM ACEC area managed for public tourism
 - b. It is the single most visited tourist facility in Baker County
 - c. The quality of the facility is outstanding
 - d. There is no other place where the Oregon Trail can be seen and interpreted.
6. The cost estimates of IPC do not compare with those of the *Edison Electric Institute*, January 2013 publication "Out of Sight, Out of Mind, An Updated Study of the Undergrounding of Power Lines." This article suggests that for 2.5 miles of rural undergrounding, the cost will be \$67,500,000. This is almost half the IPC estimate.

The Oregon Trail along the route of the B2H has the most damaging effects to its critical historic elements. Once the Trail is gone it cannot be reconstructed or mitigated back to life. Once gone, always gone. The only easily accessible public facility in Oregon is the Flagstaff Hill Interpretive Center near Baker City. The B2H must be buried to preserve this important site.

Considering the reasons above and the unconscionable desecration of our national treasure, the Council Must Deny the site certificate for the Boardman to Hemingway Transmission project.

Thank you,



Signature

Printed Name:

Ashley O'Toole

Mailing Address:

2 1/2 Depot St. # A
La Grande, OR 97850

Email:

aso+toole@gmail.com

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

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: Ashley O'Toole
Address: 2 1/2 Depot St. #A
La Grande, OR. 97850

TARDAEWETHER Kellen * ODOE

From: Cecelia Otto <ceceotto@yahoo.com>
Sent: Thursday, August 15, 2019 7:15 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019

Dear Chairmen Beyeler and Members of the Council:

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,

A handwritten signature in black ink, appearing to read "Cecelia Otto". The signature is written in a cursive style with a large, stylized initial "C" and a distinct "O" at the end.

Printed name: Cecelia Otto
Mailing address: 4630 NE Hancock Street, Portland, OR 97213
Email address: ceceotto@yahoo.com

12 August 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

Noise Sensitive Property is "property normally used for sleeping, or normally used as schools, churches, hospitals, or public libraries. Obviously the noise corona of popping, humming transmission lines will interfere with the silence campers have every right to expect in a natural setting.

This transmission line is planned to be sited within 500' west of the park boundary, which would place it easily within less than 1/5 of a mile of overnight camp sites.

The applicant's ASC should be denied until all required and adequate noise modeling has been performed.

Melissa Over
(Signature)

Name: *Melissa Over*

Address *PO Box 71*
Cove OR 97824

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

**APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN
THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT**


Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (l) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,



Signature

Printed Name: *Melissa Over*
Mailing Address: *PO Box 71
Cove OR 97824*

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means “the perimeter of the site of a proposed energy facility, it’s related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant” (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38).
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, “Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement.” The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary; 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,

Melissa Over

Signature

Printed Name: *Melissa Over*

Mailing Address: *PO Box 71
Cove OR 97824*

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I do not believe it was extensive because it is entirely inaccurate:

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, which is developed with primitive campsites and fishing docks.

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300’ of Morgan Lake; it covers 27 acres.

Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. In their application, Idaho Power conveniently omits any references to Twin Lake.

Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe “extensive work on this siting study” ever occurred.

The applicant also used aerial photography to identify and avoid, where practical, irrigation pivots, houses, barns, private runways, other structures (e.g., wind turbines), and land use features. The corridors were adjusted using topographic maps to avoid or minimize distance across very steep slopes and other physical features less desirable for transmission line construction and operation. The corridors were again checked against the constraint and opportunity geographic information system (GIS) database to avoid, where possible, exclusion areas and areas of high permitting difficulty such as potential Oregon Department of Wildlife (ODFW) Category 1 habitats. The applicant then grouped the alternative corridors into 14 regions and evaluated on the basis of permitting difficulty, construction difficulty and mitigation costs. Using the constraint database, which incorporated the eight siting factors, the applicant reviewed the alternatives to determine the most reasonable corridor within each region. (DPO p. 11)

It is distressing to think that this is only one of many errors in Idaho Power’s ASC. If the IPC surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it’s disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety

If this slipshod effort is typical of IPC's careful attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake route rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by a individuals whose remote properties and summer cabins would have been impact by the line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the routes proposed for the B2H. The haste of this effort is evident in the abundant errors of omission and misinformation typical of the B2H ASCand DPO which will be addressed in a separate comment.

Melissa Over
Signature

Name: *Melissa Over*

Address: *PO Box 71
Cove OR 97824*

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development **before** issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

Melissa Over

Name: *Melissa Over*

Address: *Po Box 71
Cove OR 97824*

July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

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,

Melissa Over

Signature

Melissa Over

Printed Name:

Mailing Address: *PO Box 71
Cove OR 97824*

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

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,

Melissa Over

Name: *Melissa Over*

Address: *PO Box 71*
~~La Grande, OR. 97850~~
Cove 97824

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

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 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.)



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Bruce Owen

Mailing Address (mandatory) PO Box 137 Durkee Or 97945

Phone Number (optional) (541) 8772245 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.

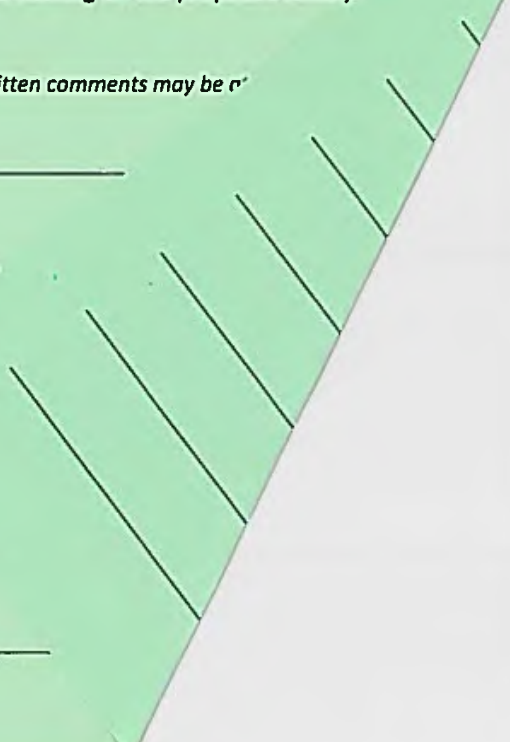
All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

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 future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony

(Please print legibly – Use the back for additional space if needed. Additional written comments may be on



Page 54

1 I'd like to digress momentarily to put forth a
2 brief history of where I'm coming from. No. 1, I've
3 been here in this area long enough to remember some of
4 the promises that were made by Idaho Power. Fish
5 passage either fish ladder, trucks or with -- pardon me,
6 thank you, Todd -- or with the construction of
7 fish-raising facilities. In every case, they have
8 waffled under these regulations to which is part of
9 Oregon law.
10 I could go on and have reams of material I've
11 collected on this. I'll get to some of the more recent
12 things here. Idaho Power most recently went to Oregon
13 asking about changing the laws about fish habitat in the
14 Snake River. They managed to do it, not because Oregon
15 felt it was appropriate, this was against Oregon law as
16 it stood, but because our own politicians waffled
17 underneath this.
18 This has been done over and over again. Most
19 recently in the paper as of June 6, 2019, once again,
20 our own politicians waffled under the regulations of
21 fish habitat, the passage of Clean Water Acts. It goes
22 on and on.
23 From a personal standpoint, the property to
24 which I have that is being impacted, years ago, 20 years
25 ago, we were required by Oregon state law to build

Page 55

1 another road that did not follow a tributary to Ladd
2 Creek. That road was built because we were required by
3 Oregon law to do it. This very same power line that B2H
4 wants to put in impacts that same tributary. A 250-foot
5 wide swath of barren ground to which they said they did
6 not want a road, barren ground road next to the water
7 source that would impact the redband trout.
8 Question to Oregon I have: Why is it I have
9 to obey Oregon laws and Idaho Power does not?
10 The other thing I question about that, too, in
11 terms of habitat, if you look at an aerial photograph of
12 our place, it's the only place within miles that has
13 old-growth timber, that has been a wildlife habitat in
14 our family for 60 years. That, in effect, is going to
15 be erased by this B2H line.
16 The question remains: Who's running Oregon;
17 Idaho or the Oregon citizens?
18 CHAIRMAN BEYELER: I did have one question.
19 MR. WAYNE KAAEN: Yes.
20 CHAIRMAN BEYELER: The nature of the lobbying
21 that you have talked about with Idaho Power, that was
22 with the Oregon Department of Fish and Wildlife or the
23 Oregon DEQ?
24 MR. WAYNE KAAEN: Near's I can tell it was
25 both.

Page 56

1 CHAIRMAN BEYELER: Was the nature of it
2 nitrogen supersaturation?
3 MR. WAYNE KAAEN: It had to do with water
4 temperature, it had to do with fish passage, and it had
5 to do with pollution in the river. Those three items
6 are the items that I researched on.
7 CHAIRMAN BEYELER: Okay. Thank you.
8 MR. WAYNE KAAEN: This is all on the Internet
9 that I have got out. And the last portion is my own
10 personal experience. Everything before that is stuff
11 that I extracted off the Internet and Oregon laws.
12 CHAIRMAN BEYELER: Will that be submitted?
13 MR. WAYNE KAAEN: I thought I just submitted
14 it.
15 CHAIRMAN BEYELER: I mean in writing, the
16 article?
17 MR. WAYNE KAAEN: I can do that, but I cannot
18 afford a dozen Philadelphia lawyers to defend me either.
19 Idaho Power can and I can't. But I suppose I could get
20 somebody to write up something for me. Would that be
21 appropriate?
22 CHAIRMAN BEYELER: Yes.
23 MR. WAYNE KAAEN: Okay, Barry. Thank you very
24 much for that comment. I appreciate it.
25 HEARING OFFICER WEBSTER: And if you submit

Page 57

1 it, please do so by July 23rd.
2 MR. WAYNE KAAEN: Boy, that's quite a time.
3 That really puts me under the crunch. Okay. Thank you.
4 HEARING OFFICER WEBSTER: Thank you.
5 Mr. Owen?
6 And is there anybody on the phone that would
7 like to give comment? Hearing none, we will take a
8 break after we hear from Mr. Owen, probably about a
9 15-minute break, and then we'll reconvene and then I
10 have a comment card here, we'll hear from Idaho Power.
11 MR. BRUCE OWEN: My name is Bruce Owen. I
12 live at 27910 Oxman Ranch Lane in Durkee, Oregon.
13 HEARING OFFICER WEBSTER: Your street name
14 again.
15 MR. BRUCE OWEN: 27910 Oxman Ranch Lane,
16 Durkee.
17 HEARING OFFICER WEBSTER: Thank you.
18 MR. BRUCE OWEN: You're welcome.
19 Twenty-five years ago, I retired and moved to
20 a lifelong dream of mine, a ranch in the Durkee area. I
21 bought it because of the scenic value and the isolation
22 with that. And for 25 years I've lived happily on that
23 ranch with the elk and the deer, and all the other game
24 animals there.
25 There is a power corridor through Durkee right

Page 58

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.

Page 59

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

Page 60

1 tonight.
2 UNIDENTIFIED SPEAKER: Thank you.
3 HEARING OFFICER WEBSTER: Mr. Nickels. Thank
4 you.
5 COMMISSIONER BRUCE NICKELS: Thank you for
6 making me first.
7 So basically what I'm going to do is reiterate
8 what Baker County's position is. And one, the first
9 thing, there's no mitigation for the people that have
10 been promised things from Idaho Power in Durkee. And
11 the farm ground there is important to people. And
12 there's been cases that there's other sites that are
13 better.
14 Anyway, that's what I wanted to say. They
15 were promised they would be taken care of. That's now
16 been taken away, for whatever reason, I don't know.
17 There's also the Oregon Department of Energy.
18 There hasn't been any analysis done of burial to
19 mitigate the visual impact of the Interpretive Center or
20 compensatory mitigation for Baker County. That
21 Interpretive Center is very important to tourism for our
22 whole county and all of eastern Oregon. Tourism is very
23 important to Baker, and we have a hard enough time
24 trying to build that up and then you take away the
25 visual aspect of it, and you're making us go backwards

Page 61

1 again. And we get nothing other than grief out of it.
2 The last thing, you didn't comply with Baker
3 County's land use plan. We need a substation if you're
4 going to put this thing here. And I know substations
5 cost a lot of money but Baker County is getting really
6 nothing out of this but grief. And with power, extra
7 power for Baker, we have a chance of some economic
8 development. We need some or a lot of power for
9 manufacturing and also business. If we don't have that,
10 Baker County has little chance to grow because we don't
11 have enough power; we can't attract those kind of
12 businesses.
13 So that's all I have to say. Other than the
14 fact I personally don't want to look at the dang lines
15 because I'm living very close to the freeway so I will
16 be able to see them, whether they're brown or whatever
17 color you want to make them. So I really don't want to
18 look at those. You should have put them on the other
19 side of somebody else's hill.
20 So thank you.
21 HEARING OFFICER WEBSTER: Thank you. And
22 we'll need the green sheet.
23 MR. BRUCE NICKELS: Yes. I told you I'd give
24 you that.
25 HEARING OFFICER WEBSTER: And I don't know if

August 18, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

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.

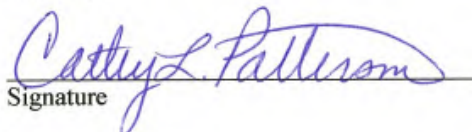
The area surrounding the drill site **95/3 and 95/4** is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.


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: Cathy L. Patterson

Mailing Address:
405 First St.
La Grande, OR 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

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95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

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Sincerely,



Signature



Printed Name: Les L. Patterson

Mailing Address:
405 First St.
La Grande, OR 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

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.

July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - Drill site 95/3 and 95/4 on unstable and steep slopes
345-022-0020

(c) ...*The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30; High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states *“The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.”* Idaho Power Corporation admits in ASC page B-12 that *“The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges.” IPCs stated original intention to the EFSC was the following: “Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled 184 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,


Signature Printed Name:

Mailing Address: 60751 Wood Road
LaGrande, OR 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing 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

LANETTA S. PAUL
Printed Name

Mailing Address: 60751 Wood Road
LaGrande, OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

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,

Janetta S. Paul

Name: Janetta S. Paul

Address: 66751 Wood Road
La Grande, OR. 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within ½ mile of site and include all noise sources required to be included in establishing the noise level generated directly or indirectly by the development. Idaho Power has not provided information adequate to determine if they are able to meet the noise standard, even with site certificate conditions.

IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant" (OAR 345-001-0010(55)).

1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed to do noise modeling for all noise sensitive property as they did not include churches, schools, libraries, or hospitals as is required by the definition in OAR 340-035-0015(38).
3. The applicant also failed to include the noise identified in OAR 340-035-0035(1)(b)(B)(ii) as not being exempt from the ambient statistical noise level indirectly caused by or attributable to that source including all its related activities. This section states, "Sources exempted from the requirements of section (1) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement." The application is not complete prior to the applicant finishing Exhibit X to include all sources required by this rule as

well as all receptors within ½ mile of the entire site boundary. No decisions can be made absent an accurate accounting of the predicted noise impacts which has not occurred.

No Proposed Order can be issued until the developer has shown that they meet the requirements at the time a site certificate is issued. OAR 345-015-0190(5) allows the Department to find the application is complete when the applicant has submitted information adequate for the Council to make findings or impose conditions on all applicable Council standards. While not all information required by OAR 345-021-0000 and 0010 must be submitted, there must be information adequate to show they meet the requirements or will meet them by implementing the conditions contained in the site certificate. The draft site certificate does not assure that the noise standard will not be exceeded, and the developer has not provided noise modeling or included modeling for all required sources of noise to establish the ambient statistical noise level of the development for all NSR's. Missing information includes: 1. Identification of all noise sensitive receptors within ½ mile of the entire site boundary; 2. Identification and notice to the owners of all noise sensitive properties; and 3. Modeling which includes Items (5)(b) - (f), (j), and (k) which cannot be excluded from the ambient noise measurement.

Sincerely,



Signature

Printed Name: JANETTA S. PAUL

Mailing Address: 60751 Wood Road
LaGrande, OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

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:

LANETTA S. PAUL

Mailing Address:

60751 Wood Road
LaGrande, OR 97850

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 5, 2019

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

To: Chairman Beyeler and Members of the Council

I am very concerned about the risks to our communities during construction of the proposed transmission line. I take particular exception to the Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN. The document states; "This plan framework serves as baseline document to guide development of the complete Blasting Plan developed with the Plan of Development before issuance of the site certificate and commencement of construction."

On page 7, at 3.4, Design Feature 32 states; "Watering facilities (tanks, natural springs and/or developed springs, water lines, wells, etc.) will be repaired or replaced if they are damaged or destroyed by construction and/or maintenance activities to their pre-disturbed condition as required by the landowner or land-management agency. Should construction and/or maintenance activities prevent use of a watering facility while livestock are grazing in that area, then the Applicant will provide alternate sources of water and/or alternate sources of forage where water is available."

The stated purpose of blasting is to "crack" rocks to facilitate geotechnical drilling. Introducing new or expanded fissures/cracks into rock may alter the flow direction or amount of water to existing natural springs or wells.

Since there is no indication that Idaho Power will determine "predisturbed" water flow from wells or springs, how will the landowner prove that flow has been reduced? Without an agreed upon baseline, negotiation or legal action will be required. In the case of private landowners, that will mean legal expenses that may not be available.

Prior to the issuance of a Site Certificate, EFSC should require the additional condition:

ADDED CONDITION TO BLASTING PLAN, DESIGN FEATURES:

Idaho Power will determine baseline flow of natural springs or wells within ¼ mile of blasting site.

Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN on page 5 at 3.3 Safety Procedures, 3.3.3 Fire Safety: Posting fire suppression personnel at the blast site during high-fire danger periods and prohibiting blasting during extreme fire danger periods is not sufficient to minimize fire risk.

Idaho Power has written terminology, "high-fire danger periods" and "extreme fire danger periods" without definition or concurrence with Oregon Department of Forestry. Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a "watchman." This is inadequate!

ADDED CONDITION TO BLASTING PLAN, FIRE SAFETY:

During blasting Idaho Power will provide a water tender staffed by a crew of at least two personnel.

Sincerely,

Lanetta S. Paul

Name: Lanetta S. PAUL

Address:

60751 Wood Road
he Grande, OR 97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Gary Pearson
Mailing Address (mandatory) 654 King Ave
Ontario, Oregon 97914
Phone Number (optional) () _____ Email Address (optional) gary6707@msn.com

Today's Date: 6/18/2019

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

Will follow Roger Finley

Note: by submitting written or oral testimony, you will receive a notice from the Oregon Department of Energy at a future date of the opportunity to request party status in a contested case hearing on the proposed facility.

Written Testimony
(Please print legibly – Use the back for additional space if needed. Additional written comments may be attached to this card.)

Input on Draft Proposed Order for the Boardman to
Hemingway Transmission Line

<p style="text-align: right;">Page 26</p> <p>1 Someone is going to comment on that later. "The 2 alternative route," called the Double Mountain, does 3 cross "the Owyhee Wild and Scenic River. Someone has 4 decided that Wild and Scenic Rivers is a higher priority 5 than EFU land, both have to be addressed in EFU [sic] 6 criteria. The other...concern is Northwest of Vale 7 [Oregon] where the B2H [power line] again crosses EFU 8 land. The alternative route there crosses Sage Grouse 9 habitat. Again, both EFU and Wildlife habitat are 10 points that have to be addressed by EFSC. Again someone 11 has decided that Sage Grouse habitat is a higher 12 priority than EFU land. SIP is asking EFSC to evaluate 13 ORS 345-20-10 which defines what EFU land is and the 14 protection it is afforded. We also ask for EFSC to 15 evaluate ORS 215.275 which lists the criteria that 16 [does] allow the power line such as B2H to cross EFU 17 land. 18 "In summary, SIP is generally well pleased 19 with Idaho Power for stopping the fast track process in 20 2010 and listening to all the stakeholders. Through a 21 collaborative [process] we have devised the best 22 possible route for the B2H power line through Malheur 23 County. SIP would like to see Idaho Power go ahead and 24 construct the power line. Most...members of SIP are 25 engaged in farming. With pressure from the Clean Water</p>	<p style="text-align: right;">Page 28</p> <p>1 might be a stranger to you folks, I assure you I'm not a 2 stranger to this project or, in fact, Idaho Power. 3 I'm a long-time resident of Malheur County, 4 and I've been involved as a concerned citizen with the 5 B2H project for over 10 years. That involvement 6 includes being in the first meetings with officials from 7 Idaho Power outlining our reasons for resisting their 8 original planned route for the 500-kV power line. I was 9 on the citizens advisory panel set up by Idaho Power, 10 which resulted in numerous additional meetings with 11 Idaho Power which finally resulted in an alternative 12 route that would avoid Malheur County exclusive farm use 13 agricultural land. 14 I have testified in front of several 15 government entities, including a government hearing in 16 Salem. I am a board member of the nonprofit entity 17 known as Stop Idaho Power. That group was instrumental 18 in the decision by Idaho Power to institute the claims 19 advisory process in the first place. 20 The only reason I am outlining my history with 21 this project is to document for the record the fact that 22 I parrot the same exact issues that Roger Findley just 23 outlined involving the entire process, and as well as 24 the fact that the area near Adrian and north of Vale, 25 the line is still going across some acreage that is</p>
<p style="text-align: right;">Page 27</p> <p>1 Act, many acres of EFU land are [now] being converted 2 from surface flow...to either" drip or sprinkler 3 irrigation. "Making this switch requires energy to run 4 pumps and motors. Also SIP understands that the greater 5 Boise area is experiencing a booming population growth. 6 Both these factors together contribute to greater 7 consumption of electrical power each year. Though some 8 of this increased demand has been met through the use of 9 renewable energy...such as wind and solar, irrigators 10 need power 24/7...not only when the wind blows or the 11 sun shines. SIP applauds Idaho Power for looking into 12 the future and trying to provide for our needs. 13 "Sincerely, Roger Findley." 14 HEARING OFFICER WEBSTER: Thank you, 15 Mr. Findley. 16 Just before we hear from Mr. Pearson, the next 17 one up after Mr. Pearson will be Jay Chamberlin. 18 And Mr. Findley, for the record, if you could 19 please state your address. 20 MR. ROGER FINDLEY: 3535 Butte Drive, Ontario, 21 Oregon. 22 HEARING OFFICER WEBSTER: Thank you. 23 Mr. Pearson, your name and address. 24 MR. GARY PEARSON: Thank you. 25 Hello. My name is Gary Pearson. And while I</p>	<p style="text-align: right;">Page 29</p> <p>1 classified as EFU land. 2 And I further want to document the fact and 3 get on record that after 10 years of effort involving 4 hundreds of hours of time, I do not want to be shut out 5 from further proceedings and/or hearings down the road 6 if they become necessary. 7 I would also like to applaud Idaho Power in 8 having the wisdom to listen to the citizens of Malheur 9 County, and work with us to change their original plan 10 and work to find an alternative route that would avoid 11 damaging the Malheur County agricultural industry, which 12 is basically our only industry. We are very, very close 13 to that goal. 14 Thank you. 15 HEARING OFFICER WEBSTER: Mr. Pearson, if you 16 would please just add your address for the record. 17 MR. GARY PEARSON: I live at 654 King Avenue, 18 Ontario, Oregon 97914. 19 HEARING OFFICER WEBSTER: Thank you. 20 MR. GARY PEARSON: If you'd like a copy of 21 this, I would like to give you a clean copy. This looks 22 like a road map because I made many changes in the last 23 10 minutes. 24 HEARING OFFICER WEBSTER: Before we hear from 25 Mr. Chamberlin, the next up is Irene Gilbert.</p>

ESTERSON Sarah * ODOE

From: Kathy PfisterMinogue <kate.pfisterminogue@gmail.com>
Sent: Thursday, August 22, 2019 4:56 PM
To: B2H DPOComments * ODOE
Subject: stop B2H

Greetings

Like many of us in Eastern Oregon, I vehemently oppose B2H. I hope you are listening to the large numbers of citizens here who oppose this transmission line which has no benefit to anyone living here and in fact is a large detriment. It will place 1228, 150 foot high towers that will destroy the view in our scenic community where tourism is important and where those of us who live here value the view shed. It will decrease many land values. It involves a 305 mile area of clear cut and affects over 11,000 acres of farmland. Perhaps when the original plan was made, the transmission of power line across long distances was more needed. Currently, the increased accessibility of solar energy along with better systems of energy storage make this expensive and disruptive power line obsolete. Additionally, micro grids are much safer in terms of disruption from outside attacks on our power systems.

I sincerely hope you will listen to those of us who live in this community. I hope you will have the courage to reconsider this plan

Kathy Pfister-Minogue
54338 Mt Emily road
La Grande Oregon 97850
5419107903

TARDAEWETHER Kellen * ODOE

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

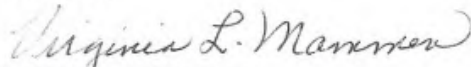
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

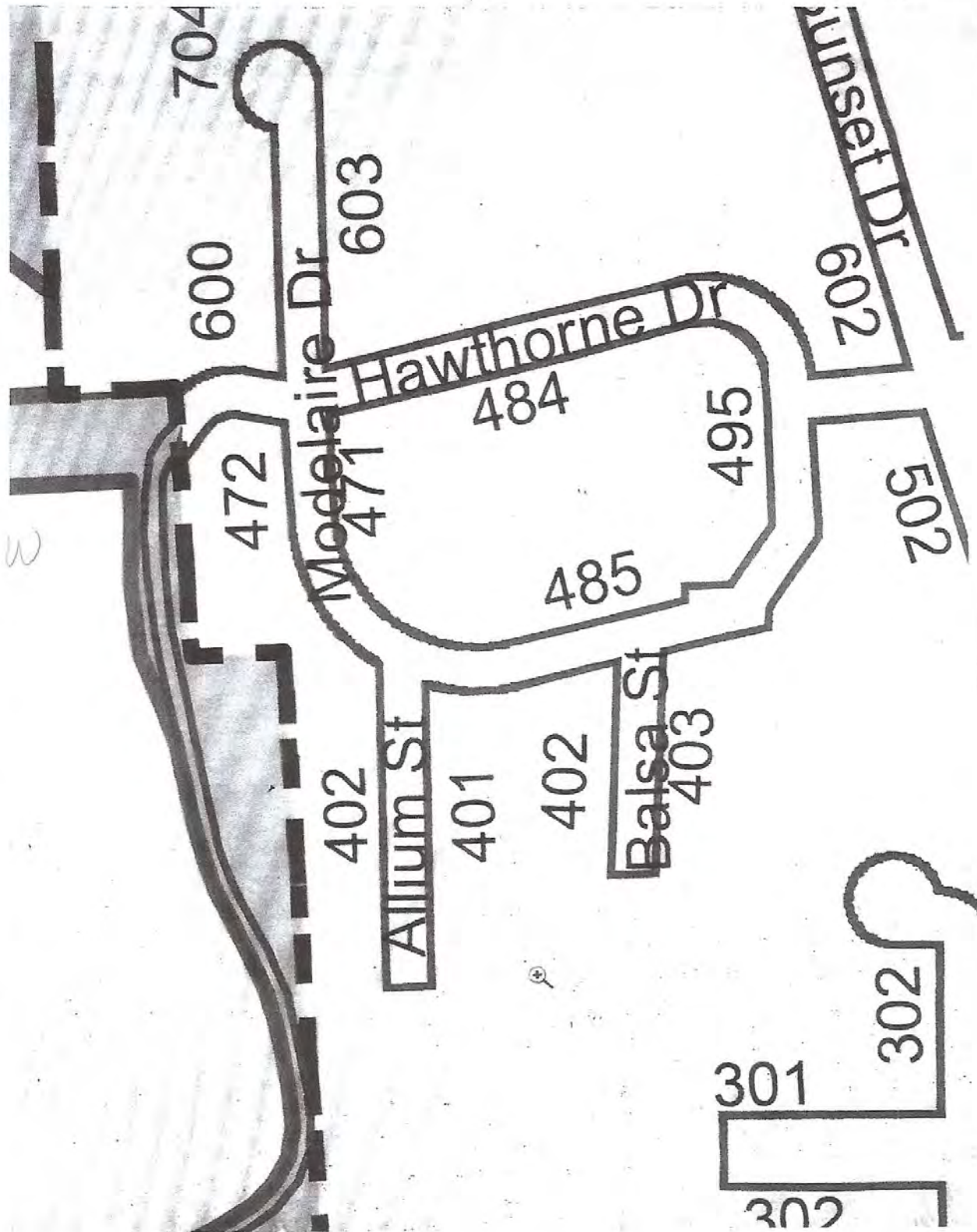


Exhibit 3

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



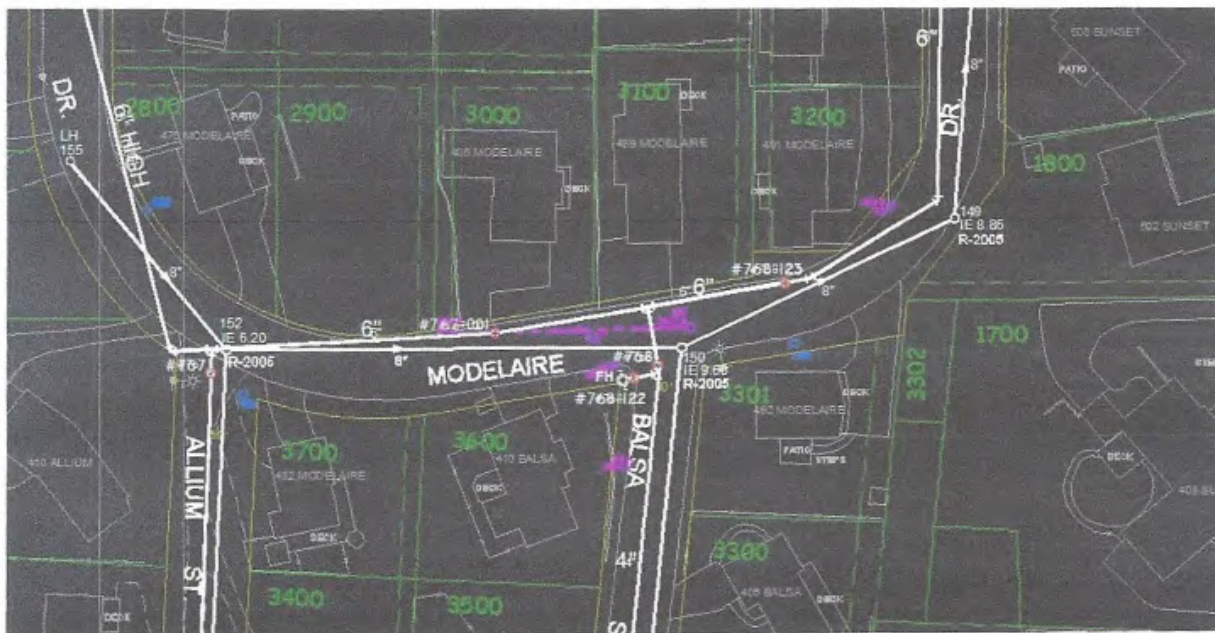
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

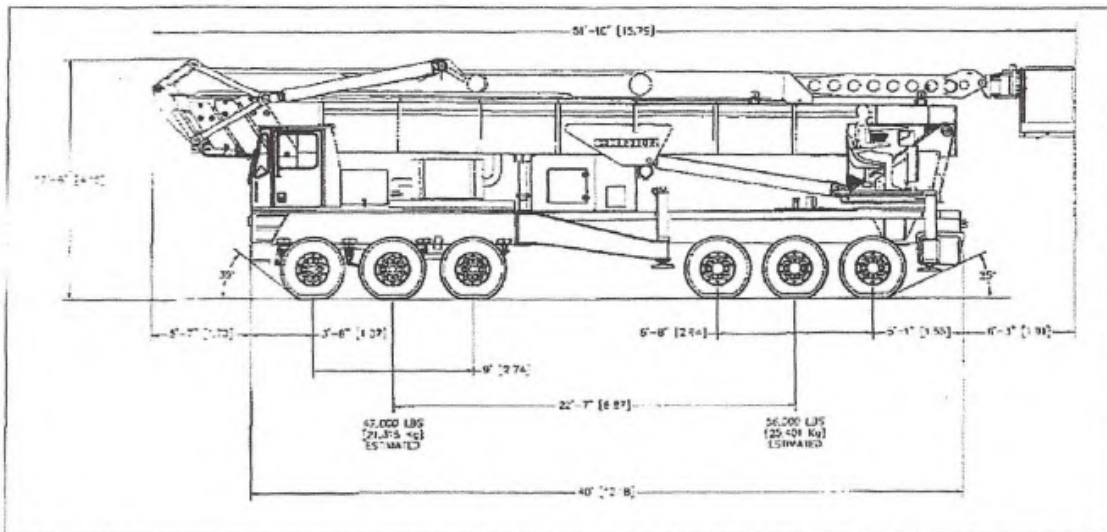


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

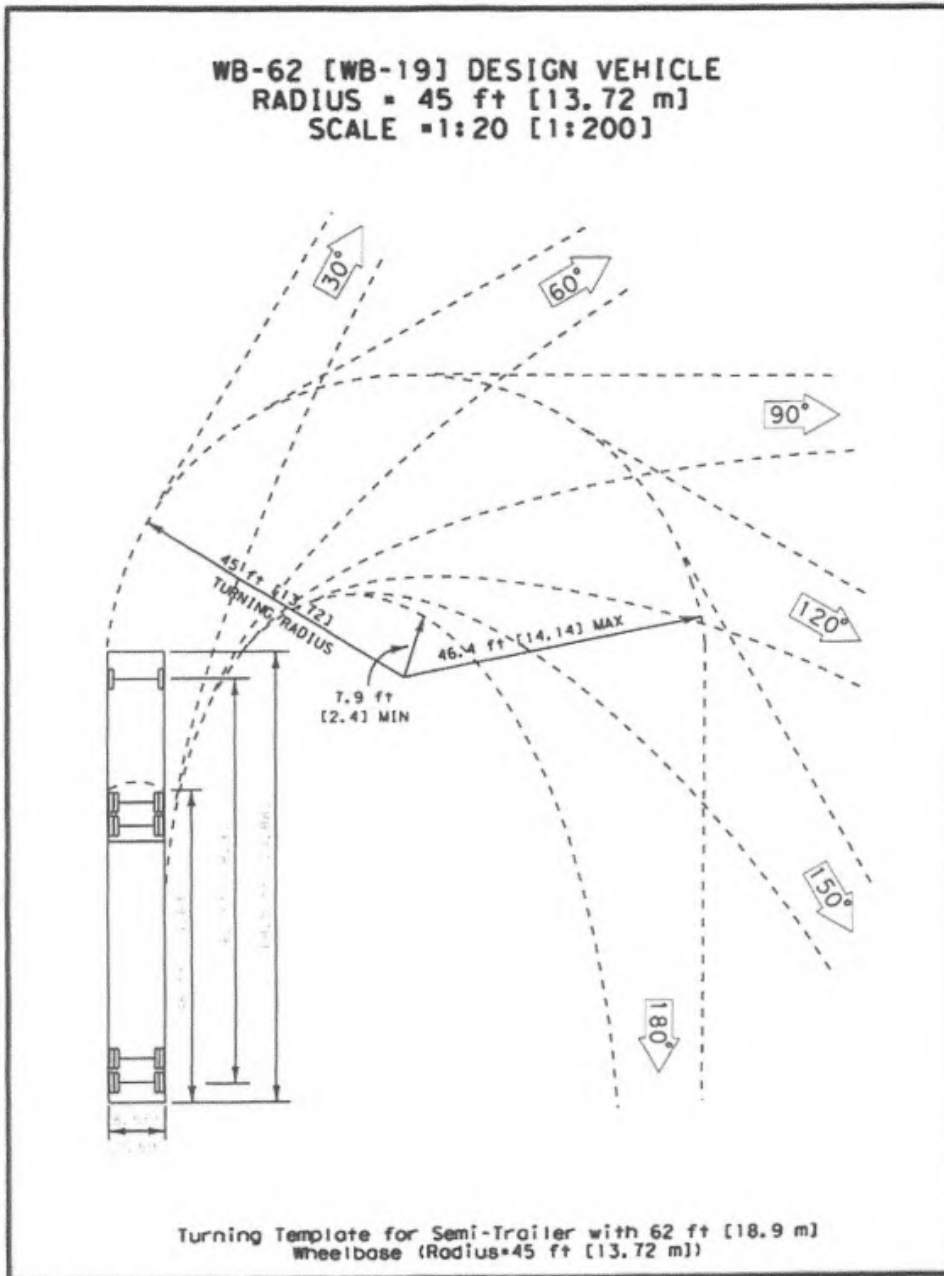


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

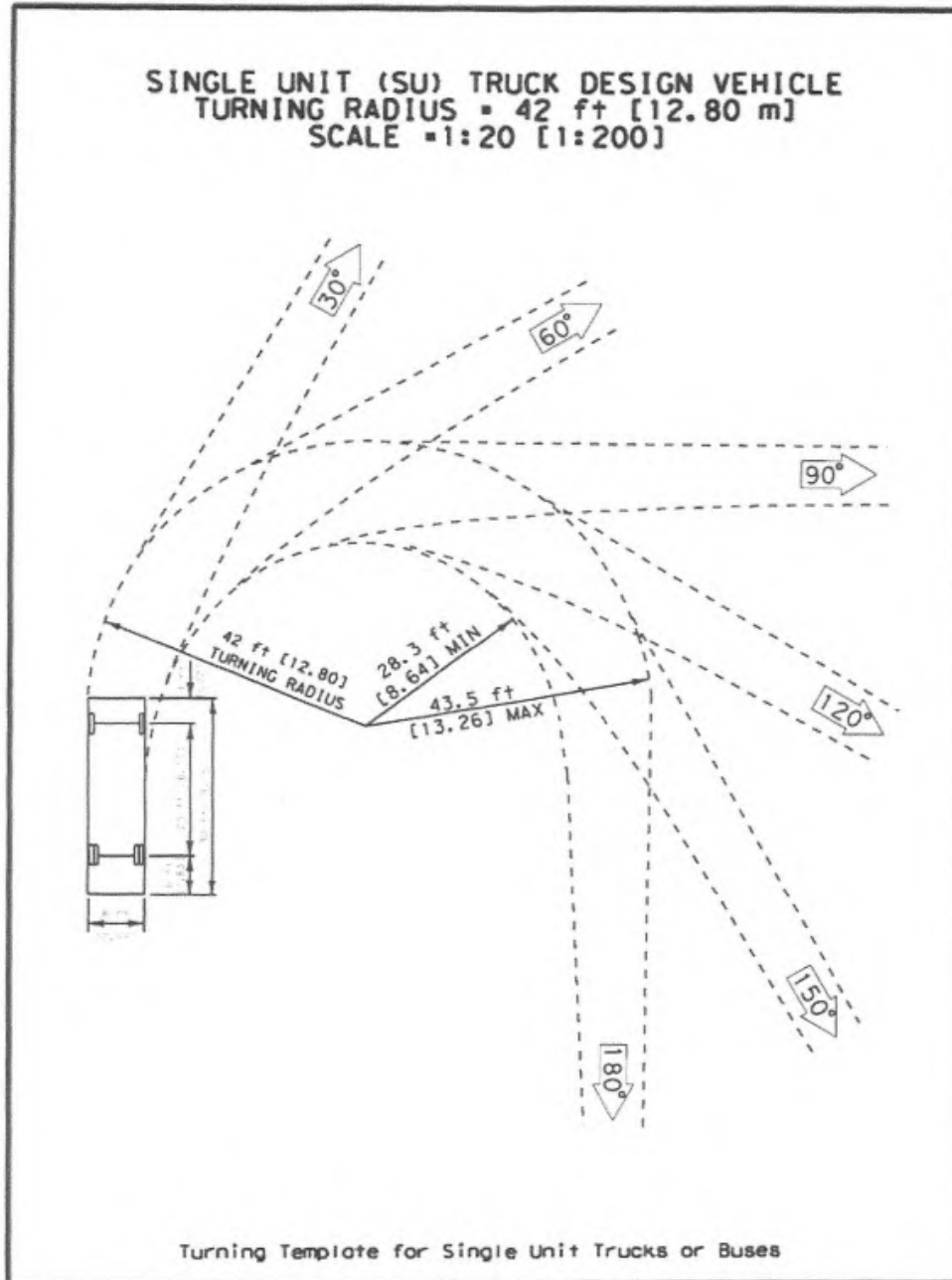


Exhibit 15

**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.

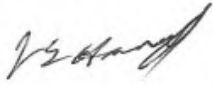
Section 17. TRUCK ROUTES

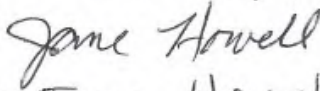
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

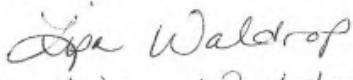
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

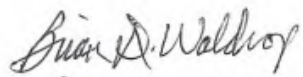
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

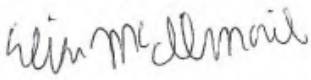
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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

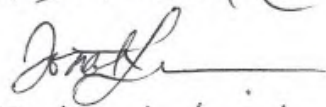

C. Huxell
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CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL


Jonah Lindeman
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jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner
Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

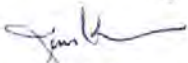
ADDRESS

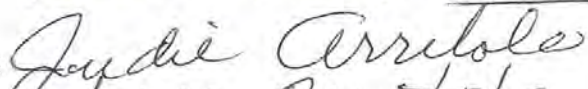
EMAIL

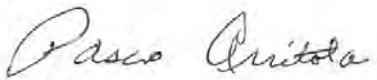
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com


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 D. Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL d mammen @ conr. com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 60366 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

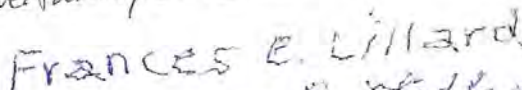
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande OR
EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
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SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

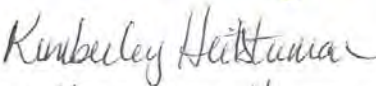
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

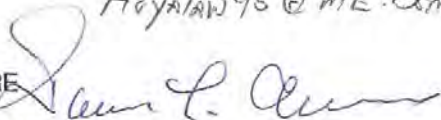
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

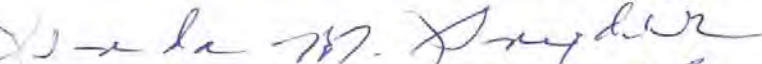
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

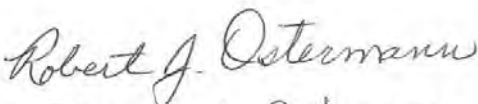
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Lonnie L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

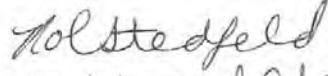
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

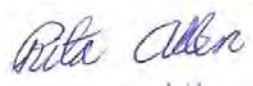
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PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

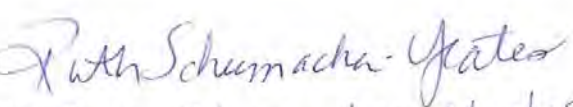
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

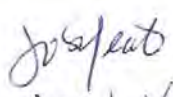
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
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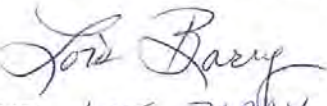
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

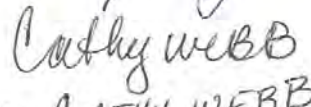
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

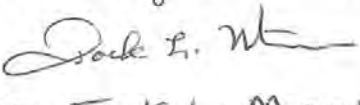
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

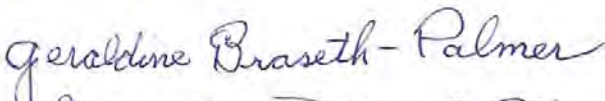

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

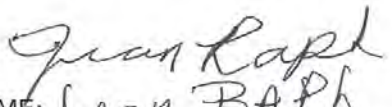
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

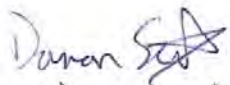
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

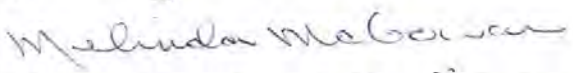
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jraph19@gmail.com

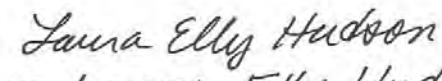
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE 
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SIGNATURE 
PRINTED NAME Laura Elly Hudson
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EMAIL ellyhudson@gmail.com

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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
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SIGNATURE *Anne G. Cavinato*
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SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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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
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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
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SIGNATURE *Robin L. Maille*
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SIGNATURE *Bruce C Kevan*
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SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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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,

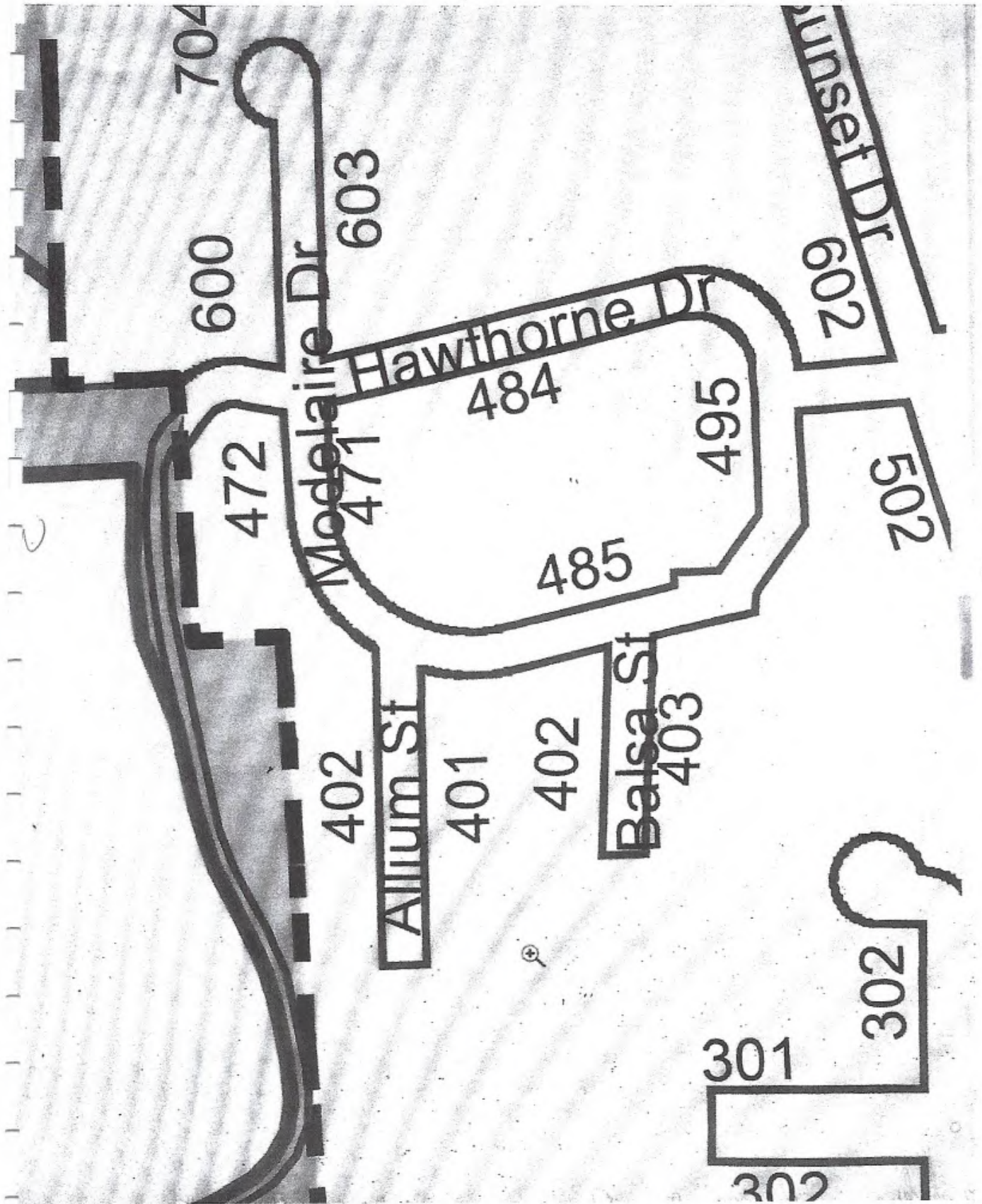


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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Exhibit 1

N



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.

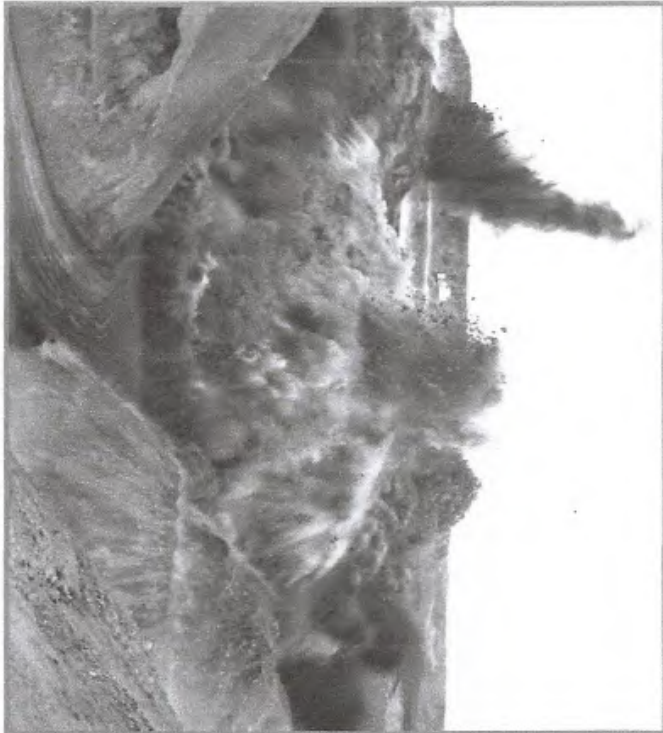
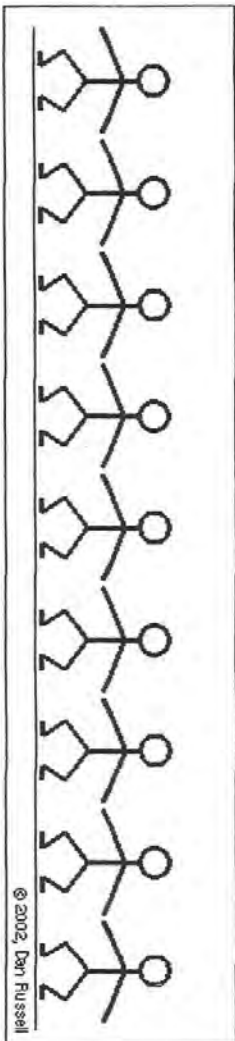


Exhibit 56

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.

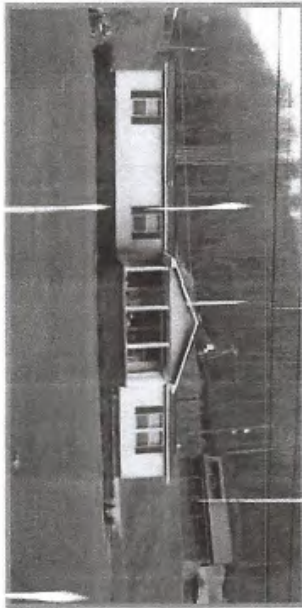
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

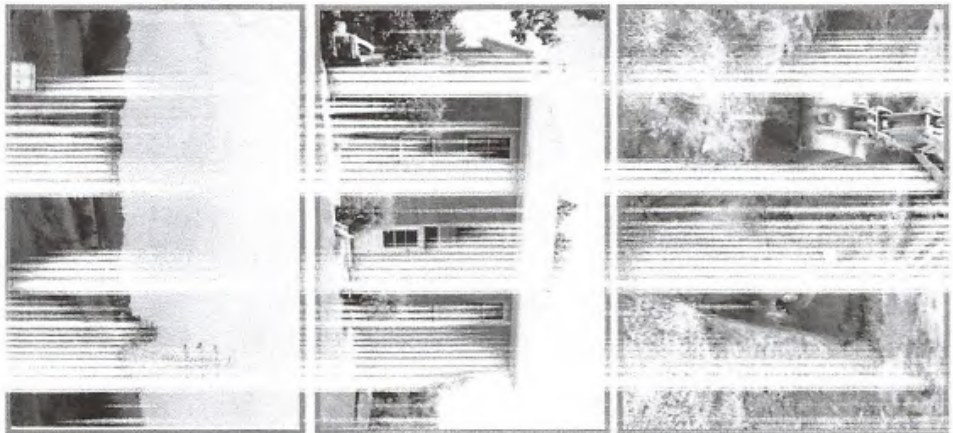
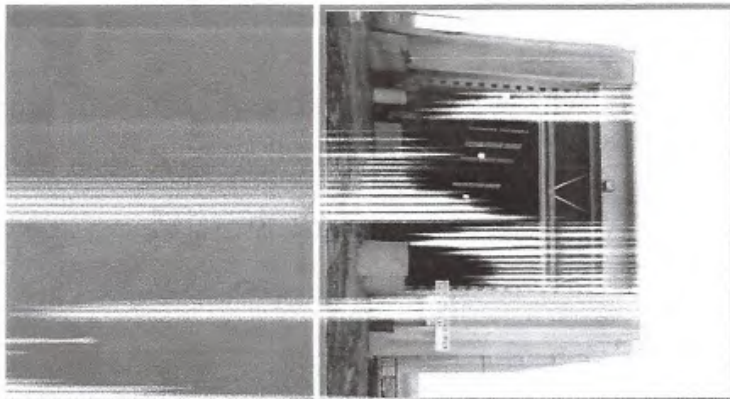
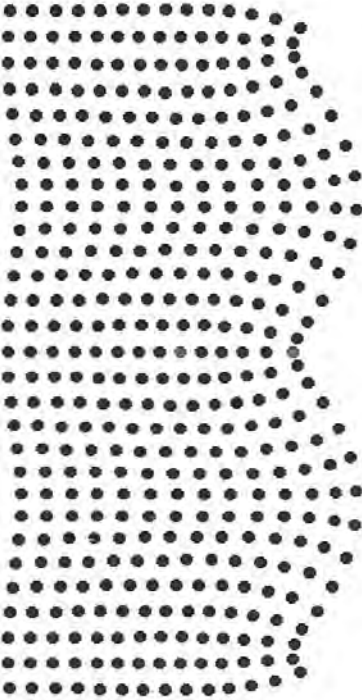


Exhibit 5D

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.

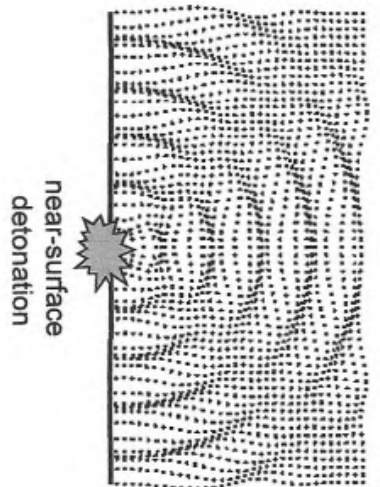
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

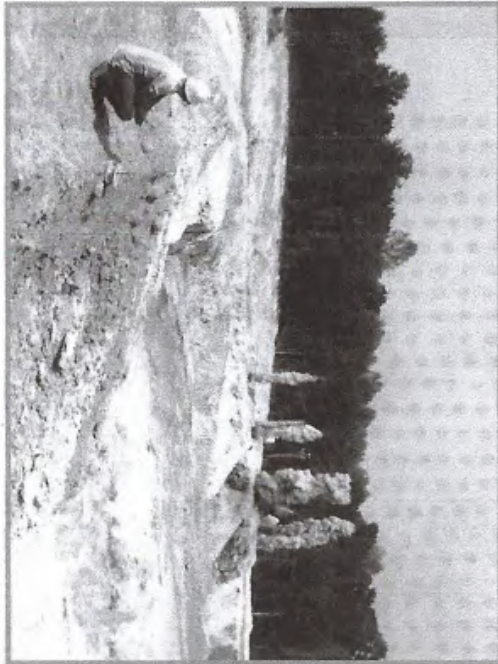
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

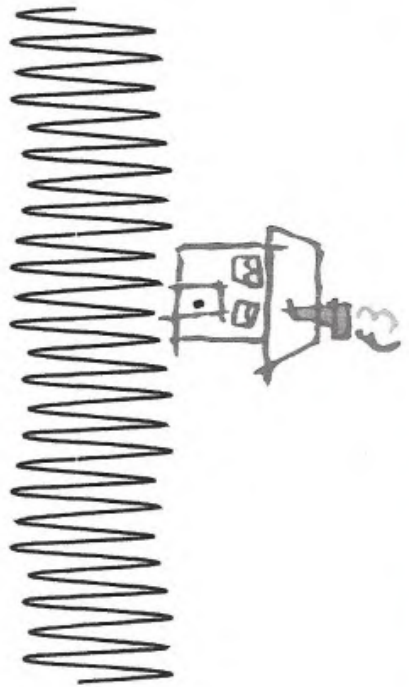
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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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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



(<https://medcenterblog.uvmhealth.org/>)

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 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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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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



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

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[Help for Child with Autism & Recurring Behavioral Crises: Part 2](#)

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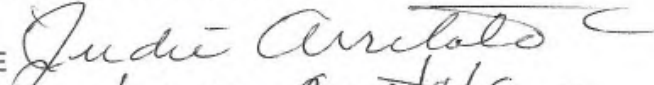


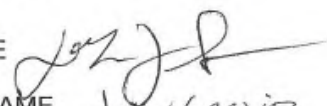
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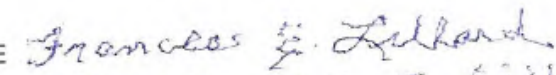
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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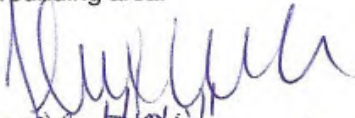
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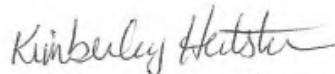
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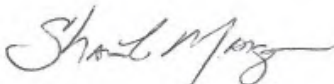
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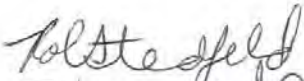
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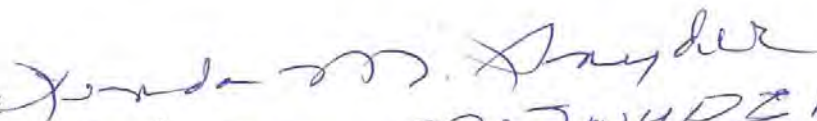
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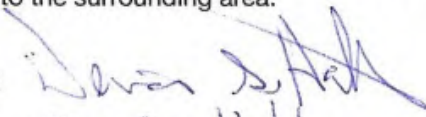
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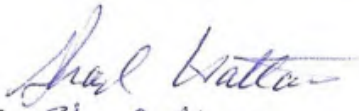
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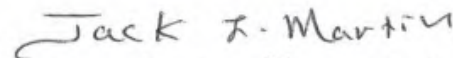
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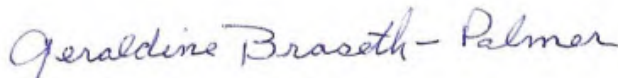
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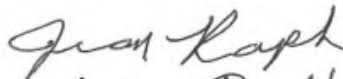
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PRINTED NAME Angela Sherer
ADDRESS 91 W. Hawthorne Dr La Grande, OR 97850
EMAIL asherer@frontier.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Merle E Comfort*
PRINTED NAME MERLE E COMFORT
ADDRESS 209 SWAPLO LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL rmaille@icloud.com

SIGNATURE *Carol 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@coni.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: Buck Pilkenton <buck48@eoni.com>
Sent: Wednesday, August 21, 2019 10:04 PM
To: B2H DPOComments * ODOE
Subject: Stop B2H

B2H.BPOC,

Eastern Oregon and Greenland have ay least two things in common. Lots of open space and no desire to turn it over to an occupier. The proposed B2H is an avaricious, asinine, amoral insult to the people, geography and culture of the affected area. Do not allow this inefficient, obsolete, and just plain ugly monstrosity to foul Oregon's land. The virtues of stopping B2H trump the meager and false benefits claimed by its pushers.

Thank you,

Buck Pilkenton
39203 Deer Creek Road
Sumpter Valley Oregon 97877
541 894 2527

TARDAEWETHER Kellen * ODOE

From: Ryan Neal <RyanN@portofmorrow.com>
Sent: Friday, June 14, 2019 8:50 AM
To: B2H DPOComments * ODOE
Subject: Public Comments B2H
Attachments: B2H Letter of Support Energy Site Council 6-14-19.pdf

Good Morning,

Attached you will find public comment for upcoming comment period for B2H project from the Port of Morrow. Thank you for your time.

Ryan Neal

Executive Director



T: 541-481-7678

M: 541-371-1546

F: 541-481-2679

ryann@portofmorrow.com -

www.portofmorrow.com

2 Marine Dr. PO Box 200 • Boardman OR,
97818



Members of the Energy Facility Siting Council:

Reliable, economic power is crucial to the continued success of the Port of Morrow. Over the years, we've relied on a plentiful power supply to attract data centers and other electricity-intensive businesses to the port.

We need the Boardman to Hemingway (B2H) transmission line to keep the momentum going. B2H will provide enough capacity to ensure our local businesses can grow and new ones can be built, providing jobs and improving the economic future of our state and region.

Existing lines have paved the way for the Port of Morrow's success. But their capacity is limited, and they can't carry any more energy in peak times. B2H will give us a direct connection to up to 1,000 megawatts of power and free up capacity on the existing lines. Besides connecting us to power generated in the Pacific Northwest and Mountain West, it will give us access to surplus solar power in the Southwest.

The importance of this project to the Port of Morrow's sustained prosperity, which helps keep Oregon's economy on track, cannot be overstated.

Please take this benefit into consideration when making your decision on a site certificate for Boardman to Hemingway.

Thank you and please contact me with any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Neal', is written over a faint, circular stamp or watermark.

Ryan Neal
Executive Director



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Timothy C. Proesch
Mailing Address (mandatory) 2104 Owlhee Lake Road
P.O. Box 2588 Nye, NV 89913
Phone Number (optional) (971) 270-4479 Email Address (optional) owlheecassis@gmail.com

Today's Date: June 18 2019

Do you wish to make oral public testimony at this Hearing: Yes No

Written comments can also be submitted today.

All written comments must be received by the deadline, July 23, 2019, 5 p.m. PDT to:

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301
Fax: 503-378-6457
Email: B2H.DPOComments@oregon.gov

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 50</p> <p>1 HEARING OFFICER WEBSTER: Thank you for your 2 comment. Thanks. 3 Next we'll hear from Mr. -- I can't tell if 4 it's a "P" or an "F." Is it Froesch or Proesch? 5 Following Mr. Proesch we will hear from JoAnn 6 Marlette. 7 MR. TIMOTHY PROESCH: My name is Timothy 8 Proesch. I live at 2104 Lake Owyhee Road, which is a 9 Nyssa address also but closer to Adrian, as the Fosses 10 as well. So if you guys, you've been on your map and 11 looked at section 13 and tower 255/4. So I purchased 12 this property in November of last year. This was just 13 brought to my attention not even 2 weeks ago that you 14 guys have proposed to the previous owner that you guys 15 had an agreement with them to survey this land to put 16 this in. So if you look at this section 13, not only 17 are you guys putting a tower on my proposed new home 18 site, you guys are also wanting to use an existing road 19 that I use to access my irrigation for the whole 20 property, which is 113.7 acres. 21 Nobody from Idaho Power, nobody from Oregon 22 Department of Energy has contacted me. The last time 23 there was even a title search done on this property, 24 knowing it was on the market, was May of last year. So 25 we're looking at year and a half that you guys haven't</p>	<p style="text-align: right;">Page 52</p> <p>1 continued property search and title search on these 2 properties that impact private land, I think is kind of 3 an oversight that needs to be addressed. Because now 4 here I am owning this property for almost a year now and 5 not been contacted whatsoever regarding this, but yet, 6 your proposed site runs right on my property, and then 7 your lines are going to drape from my property and my 8 new proposed home site across that pivot that Mr. Foss 9 discussed previously. 10 So I mean, I haven't seen another map; I just 11 have the map that was presented to me by Idaho Power 12 yesterday. I talked to a representative from Idaho 13 Power yesterday, who came to my house, who showed me the 14 detailed map. And I haven't even seen whatever, the 15 other map you guys are talking about, Double Mountain. 16 So I don't even know how close that infringes on my 17 property. 18 But to have this just being brought to light 19 and you guys want to move forward with this project, is 20 kind of devastating to me, especially for the amount of 21 property that I purchased and for the price I purchased 22 it for, there's a reason I purchased this property away 23 from everything and everybody; not to be impeded on by 24 anybody else, especially a big corporation. 25 I feel kind of bullied into this whole thing.</p>
<p style="text-align: right;">Page 51</p> <p>1 done any due diligence to continue to see, knowing this 2 property was on the market. And now I feel like I'm 3 being forced into allowing this to transpire because 4 this is your guys' proposed route. 5 So I am not obligated to continue to follow 6 the contractual agreement that you guys had with the 7 previous owner for the surveying of this land. I 8 purchased this property outright from the previous 9 owner; there's no bank loan or anything on this 10 property. 11 And so I have come ill-prepared for this 12 meeting because I just found out about this, and I have 13 not been contacted by anybody; not Idaho Power, like I 14 said, not Oregon Department of Energy, nobody. This was 15 brought to light to me by my neighbors. They said, Do 16 you know about this? I said, No, absolutely not, nobody 17 has contacted me whatsoever regarding this issue. But 18 yet, the proposed route runs right through my property 19 with the tower and an access road which is going to take 20 up a huge chunk of my land. 21 So there's several issues that I am going to 22 bring to your guys' attention in my formal written to 23 you guys because, like I said, this was just brought to 24 my attention. But to have this not discussed with me 25 through any kind of proper channels and not doing a</p>	<p style="text-align: right;">Page 53</p> <p>1 And talking with Idaho Power, we talked about the 2 eminent domain also, which I don't feel like is fair to 3 somebody who's a private landowner. Especially I 4 shouldn't have to follow a contractual agreement you 5 guys had with somebody else just for the survey of the 6 property. Here it is impeding clear through my 7 property, and it's impacting my neighbors and everybody 8 around me. 9 I have future plans for development for this 10 land, not just to have Idaho Power take up the majority 11 of my land. Like I said, if you zoom in on this, you 12 guys are taking up a huge chunk of my property. The 13 biggest chunk of my property that I have, which is like 14 88.8 acres, you guys are going to drive right through 15 the middle of it to access your guys' tower and then 16 your tower is going to be on my property, on my new 17 proposed home site that I've been planning since I 18 bought this property a year ago. 19 And to just have this brought to me, it wasn't 20 even brought to me through the proper channels, it was a 21 concerned neighbor that was concerned because he knew my 22 future plans and knew what I had done and how much money 23 and how much capital I have invested in doing this. 24 This is my life savings. Yes, I'm younger than most of 25 these people that are speaking out about this, but it's</p>

Page 54

1 not from not doing my due diligence of the zoning of
2 this property to be developed, and coming up with that
3 kind of money to purchase a property of that magnitude.
4 I think that all of these things should be
5 considered, especially when encroaching on private land,
6 because it does impact us, everybody around us. And I
7 know you guys have been working on this project for a
8 long time, but I think there needs to be some other
9 proposed routes instead of encroaching on private land,
10 especially when we pay for this land, we've purchased
11 this land, not to be encroached on, not to be bullied
12 into doing something that a corporation wants to do
13 because it's convenient for them to transfer power to
14 other places.
15 After talking to the representative from Idaho
16 Power, he basically told me that you guys are just going
17 to pump a bunch of power through there to Portland. How
18 does that benefit me? There is no benefit to any of us
19 for this proposed line. None. I'm not getting more
20 power, I'm not getting anything from it other than it
21 being a nuisance and it impacting us tremendously.
22 Also with the electromagnetic field that it
23 produces, I have four babies. If BLM wants all these
24 studies done to be able to run through BLM land, how it
25 impacts nature and the environment and the waterways,

Page 55

1 how does it impact my family and my children, my future?
2 This is already -- the reason we purchased the
3 property the way we did is to put it into a trust to
4 never be sold after it's developed, for it to stay in
5 the family to create a legacy. Not to have some power
6 lines running through there that, who knows. I mean,
7 you guys have been working on this 10 years. Are you
8 guys going to change it again in 10 years and want to
9 put more there? Am I slowly just going to get closed in
10 on? There's been no definitive answers to these
11 questions that I've asked. Like I said, I've never been
12 contacted by any representatives; I had to contact Idaho
13 Power to talk to them. Nobody has contacted me except
14 for my neighbors.
15 So I feel this was a big oversight on your
16 guys' part by not contacting me as the landowner. Like
17 I said, I put everything, my whole life savings into
18 this property and I want to continue to do that, but at
19 this juncture, I mean, it's a major devastating loss for
20 me financially if this continues to happen because it
21 impedes a lot of my property.
22 And I told the representative from Idaho Power
23 that I'm definitely not comfortable with this situation.
24 I mean, there's no open communication other than me
25 contacting them and having them come to my house.

Page 56

1 And it's not every day that a property of this
2 size is purchased in Malheur County for the intentions
3 that we have, which I can go into in my written
4 statement. But I'm wanting this to be something for
5 everybody to enjoy. We have multiple things going on.
6 There are tons of wildlife, tons of geothermal activity.
7 I have four geothermal wells on this property that can
8 be utilized for multiple purposes.
9 The whole intention of this was to create
10 something for Malheur County, for the people here; not
11 just myself and not just capitalizing on this potential
12 that it has. But the road to the lake goes right
13 through my property. Everybody that goes to the lake
14 could enjoy this and be a part of this. I feel it is
15 detrimental to that development to have Idaho Power go
16 right through my property and then to take up this much
17 of my land.
18 I worked hard to have the money to be able to
19 purchase something of this magnitude. So to have it
20 impeded and to have it kind of looking like it's going
21 to be diminished to the capacity that nobody's even
22 going to want to recreate there. I mean, this is a huge
23 recreation area. On top of there's nothing like this
24 that's available to the people of this community in
25 Malheur County. Not only that, but the tourism that

Page 57

1 this whole area draws. I mean, people drive up there
2 just to look at that siphon because of the magnitude of
3 the siphon. So it's not just the wildlife and our
4 property and our neighbors' property, the irrigation
5 district sees people using these access roads to see the
6 magnitude of something that great.
7 And I feel like having this transmission line
8 go through there is going to be totally detrimental to
9 everything that everybody in our area sees the potential
10 in this whole recreation area from the lake clear down
11 to the local grocery store that's there. Because if
12 this happens, that local grocery store is going to
13 suffer also. It's not just one thing or another.
14 There's so much that we have to consider in this whole
15 thing, and I feel like none of these things are being
16 discussed. And yes, there are certain things we should
17 put in there as far as how it's going to impact. And I
18 understand you guys have your guidelines, but put
19 yourself in my shoes. If you just paid this much money
20 for 113 acres and then find out, Hey, sorry, we're going
21 to take your road away from you and we're going to put a
22 tower on your property where you want to build your
23 house.
24 I think this all needs to be considered. I
25 will write up a formal letter to you guys once I do some

Page 58

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

Page 59

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

Page 60

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

Page 61

1 regards to that property in any way, had no
2 representatives from Idaho Power come and look at that
3 proposed siting.
4 So my concern is similar to Foss's, is that
5 the current proposed route will create additional roads,
6 additional access, additional traffic, that we as
7 private landowners will need to contend with and deal
8 with. In my opinion, if they would have consulted with
9 local landowners who know the area more thoroughly in
10 this location, we could have helped them locate the
11 power line approximately 1 mile directly to the west and
12 farther to the south that would have avoided any of the
13 exclusive farm use property and been off of private
14 property.
15 I'm not sure their reasoning for wanting to
16 continue to keep the power line as close to private
17 property as they can. I don't know if it's easier for
18 them to deal with private property owners than it is to
19 deal with the BLM, Bureau of Land Management. But in
20 this case, they could have done a much better job
21 consulting with the local landowners in that specific
22 area.
23 That's what I'd like to say. Thank you.
24 HEARING OFFICER WEBSTER: Thank you.
25 Anybody else this evening?

ESTERSON Sarah * ODOE

From: Owyhee Oasis <owyheeoasis@gmail.com>
Sent: Thursday, August 22, 2019 11:14 AM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order 5/23/2019.
Attachments: CH. 469 Oregon Legislature with highlighted points.pages; 21S45E1300301_Survey Results_20190722.pdf; Owyhee River_20190821_v2.pdf

Date: August 22, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Dear Chair Beyeler and Members of the Council:

I would like to introduce myself, my name is Timothy Proesch. Our address is 2104 Owyhee lake road Nyssa, Oregon 97913. I am writing this letter today because this project was just recently brought to my attention. We started the purchase of this property almost one year ago to the day I am writing this, we were finally able to close in November of 2018 as this was a major purchase the property was almost 3/4 of a million dollars and is 113.4 acres. After weeks of negotiations we finally came to an agreement. During this time we asked the owners, caretaker, and title company about this proposed project and were told is was an old project that had subsided for multiple reasons, that being said it was definitely a determining factor for purchasing 2104 Owyhee lake road. So from day one we have been deceived and that has continued through now.

The only persons and or entities to contact us about this project were our neighbors. Idaho power has not followed through with any due diligence in completing this project or they would have continued to title search all of these private properties that they would like to utilize for there benefit of this Boardman to Hemingway line project. I have continually and tire contacted Idaho power to get any and all information about this project as we were notified only a week and a half prior to the Efsc meetings being held around Oregon. When I addressed the council publicly I had voiced that I was ill prepared as I needed to find out more about this project and how it would intrude upon our property and what our role would be in this project. I was given a small map and quite frankly was appalled at how intrusive it was to our property, especially without any contact from the entity wanting to utilize our property for there benefit. Finally about three days prior to the EFSC public comment period I contacted Idaho power and remember this is only about four days after finding out about this. I was put onto contact with an Idaho power project engineer named Mike Vaughn, after contacting him Mr. Vaughn was to our property very shortly thereafter. As the president of our company and myself sat down with Mr. Vaughn he explained very vaguely what the project entailed, also at this time we had a lot of questions which I would speculate anyone would once you look at the attached map and see how much of our land they proposed to take over for there company. During this meeting we were encouraged to let them do their job and not continue with our development because it would impede there goal and we would just have to demolish and remove any development that would be in there way and we should wait for EFSC to approve there project. During this time we also questioned what would happen if we weren't ok with this project and what recourse we would have? We were told that it was happening no matter what that they had worked on this and sorry we weren't involved but there would be no recourse in this matter and if we didn't cooperate that they would push for inanimate property domain repossession, big words for us to absorb but we had an understanding of what this meant so I replied "how could this happen?" I was told by Mr. Vaughn that we didn't have "deep enough pockets to battle this in court". At the initial meeting on our property we asked Mr. Vaughn for any and all paperwork he could provide us pertaining to this project. And the only materials I was provided at this time were what our neighbors provided and nothing from Idaho power. I show up to the EFSC public meeting to make my public statement, I hear someone call my name from across there room and see someone I have never seen before calling out my name, it is another Idaho power representative whom I have never met in my life but he knew exactly who I was, introduces himself

as Mark from Idaho power, again I tell him we are not interested in them using our land for there project again I am told sorry about your luck but its happening and really nothing I can do at this juncture because it is so late in the planning stages. I make my public comment to the board the meeting commences and Mark wants to talk to me yet again. I told him my neighbors, family and myself are not interested in this project and why weren't we notified? I was told well since BLM forced them onto private lands in the 305 mile stretch of this project it crosses and interferes with over 700 private properties and they cant talk to everybody and title search all these properties continually to ensure it isn't a problematic to the property owners. Mark also encouraged me to try and talk to my neighbors and see if we could arrange a meeting, I said well my neighbors are not interested either and that they were upset with me because they thought we were ok with your project because of how much land of ours was going to be used in this project as that was not the case at all.

A few weeks later we received a phone call of a cordial invitation to a banquet dinner from Idaho power for us and our neighbors to discuss the matter at hand. We were assured our neighbors would be attending as they were just invited and confirmed as going. We show up to the address we were given, The Vale Grange Hall which is bout 30 minutes away from our residence. We arrive and it is in fact not what was described the only people in attendance are 8 Idaho power employees and our two closest neighbors. We all start talking to Idaho power looking at maps and discussing this proposed project. During this meeting I ask once again for documents pertaining to this project and I was told they had it all together and I should be receiving it within a day or two and that it could be emailed as well. Finally after about two hours of back and forth we asked ok so why are we here? They said well we want to know how you feel about this project and if you have any suggestions on alternative routes or anything for this project. I stand up with the map they provided and go to the overhead protector and show them what they have outlined as Vale BLM district utilities corridor, I explained to them at this point it would benefit all parties involved if they were to include this utilities corridor into there site mapping and avoid all of our properties all together. I proposed to Idaho power that I had come up with an A,B, and C option that suites our needs and asked if they had other options if EFSC dines there current proposal MR. Vaughn said No, there is no B option this is happening and it will be difficult to stop this project, My A proposal was in our favor that EFSC denies this project, B they find an alternative route that avoids all of us and utilizes the existing corridor, And C we go to court. My neighbors and myself agreed that it should be the designated route and that we would like them to contact BLM to get this done. The meeting commences and my wife and I are confronted by Mike Vaughn and another Idaho power associate and told if we want any of the information we will have to subpoena this information because of legality purposes and that it isn't public information because it was between Idaho power and the previous land owners, I was emailed a biological survey of our property which is completely inaccurate and could be considered a falsified document in order to achieve there ultimate goal, also at this time our neighbors are also talking to other Idaho power representatives. I walk over to where my neighbor Mr. Jim Foss is standing talking to and Idaho power representative and they are offering him two brand new pivots to replace the existing one he has because the power-lines magnetic field will cause issues to the existing GPS operated one that is currently in operation on his property. We leave and the neighbors and I agree to be in touch soon. A few days later we hold a meeting at the Owyhee water shed with our neighbors and discuss what our next steps are. We all agree to setup a meeting with BLM.

With the help of Roger Finley we were able to get meeting scheduled with vale BLM representative Renae and Brent. All of our neighbors and Mr. Finley as well as representative Lynn Finley are in attendance. During this meeting we discussed the process and what role each representative of each entity played in the planning of this project. Introduced ourselves and proceeded to delve into the discussion. We proposed several options to the BLM for routes, even to go as far as offer to purchase land to be utilized for this project or to do a land exchange. The discussion also led into co-locating the new power lines within the existing power corridor and we were told that wasn't possible because of 9/11. 9/11? So we are fear mongering the general public with unprecedented or factual documentation of terroristic threats to a power corridor that is of insignificant threat for a terrorist attack? We all left feeling like the meeting that we had was productive and that they would work with Idaho power to remedy this. Just this morning 8/22 as I was writing this letter I had to stop and have a scheduled conference call with Idaho power regarding there new proposed route they discussed with BLM, once again it was a half hearted attempt on Idaho powers part to remedy this situation. I was railroaded once again into having to subpoena any information even though through the public information freedom act, and told that there was no information that can be provided to us at this point.

In short, to summarize the gravity of this situation we are not accepting of this project. We have been continually and persistently deceived and deprived of any information to be able to site specific ORS numbers. I can assure you the biological, cultural, and eis surveys have been not conducted in such a manner other than to achieve Idaho powers goal of using our personal private property to their benefit. I would hope the council can understand our position and hold accountable Idaho power for the manner in which they have approached this project. I have been put off in every way trying to obtain information regarding this project and there are several ORS numbers that have not been strategically

followed in this process. I have had limited time in this manner to obtain specific ORS numbers and compile the complete list of the deceitful process Idaho power has been conducting there business, from limited public input or information to incomplete survey information they have provided to EFSC. I hope that the bribery of offering equipment and or services to achieve their goals is taken into consideration as well. I will include some maps and a few ORS numbers and information on a separate attachment.

In closing I want to thank you for taking your time to read this letter documenting my experience with this entity in the short time I have had the opportunity to preserve my property from such a project that will be detrimental to my way of life as well as my investment and the quality of life for our friends neighbors and children who are the future generation that will be preserving this property and the way we have choose to live our lives in the canyon lands of Malheur county. EFSC must deny the this site certificate and include all of these factors in determining that there is a better way in the future to achieve projects of this magnitude. Without deceiving the general public, private landowners ,and EFSC. I have also included many points of contact for further comment and discussion of this matter and encourage any and all continued contact to stay informed and up to date on this project.

Best regards,

Timothy C. Proesch

2104 Owyhee lake road Nyssa, Oregon, 97913

P.O.BOX 2583 Nyssa, Oregon, 97913

owyheeoasis@gmail.com

Home-(971) 270-4479

Cell-(208) 405-1222

Work-(541) 212-4611

Ch. 469 Attachment has specific highlighted areas to be pointed out, the first map (Parcel 21S45E1300301 survey results) is Idaho Powers Inaccurate geological survey of the property, The second map is a revised map that we were sent yesterday, August 21, 2019 after Idaho Powers PRIVATE meeting with Vale BLM.

Boardman to Hemingway
 Transmission Line Project

Parcel 21S45E1300301
Survey Results

Malheur County, Oregon



Survey Results

- Parcel Boundary (21S45E1300301)
- Wildlife Sightings

Noxious Weeds

- Bur buttercup
- Canada thistle
- Field bindweed
- Kochia
- Russian thistle
- Scotch thistle
- Whitetop

Habitat

- Agriculture / Developed
- Open Water / Unvegetated Wetland
- Shrub / Grass
- Wetland

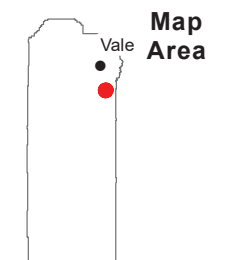
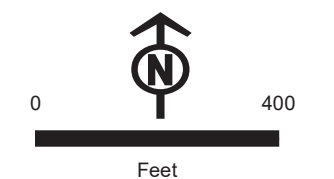
Project Features

- Proposed Route
- Site Boundary (Survey Corridor)
- Mile
- Tenth
- Access**
- Existing Road, Substantial Modification, 21-70% Improvements
- New Road, Primitive
- Work Areas**
- Pulling and Tensioning
- Structure Work Area
- Land Status**
- Bureau of Land Management
- Private
- Designated Utility Corridors**
- Vale District (BLM) Utility Corridor

Notes:
 Not intended for construction, or any uses other than intended purpose.

Data Source(s):
 BLM, Idaho Power, Malheur County, ORBIC, Tetra Tech

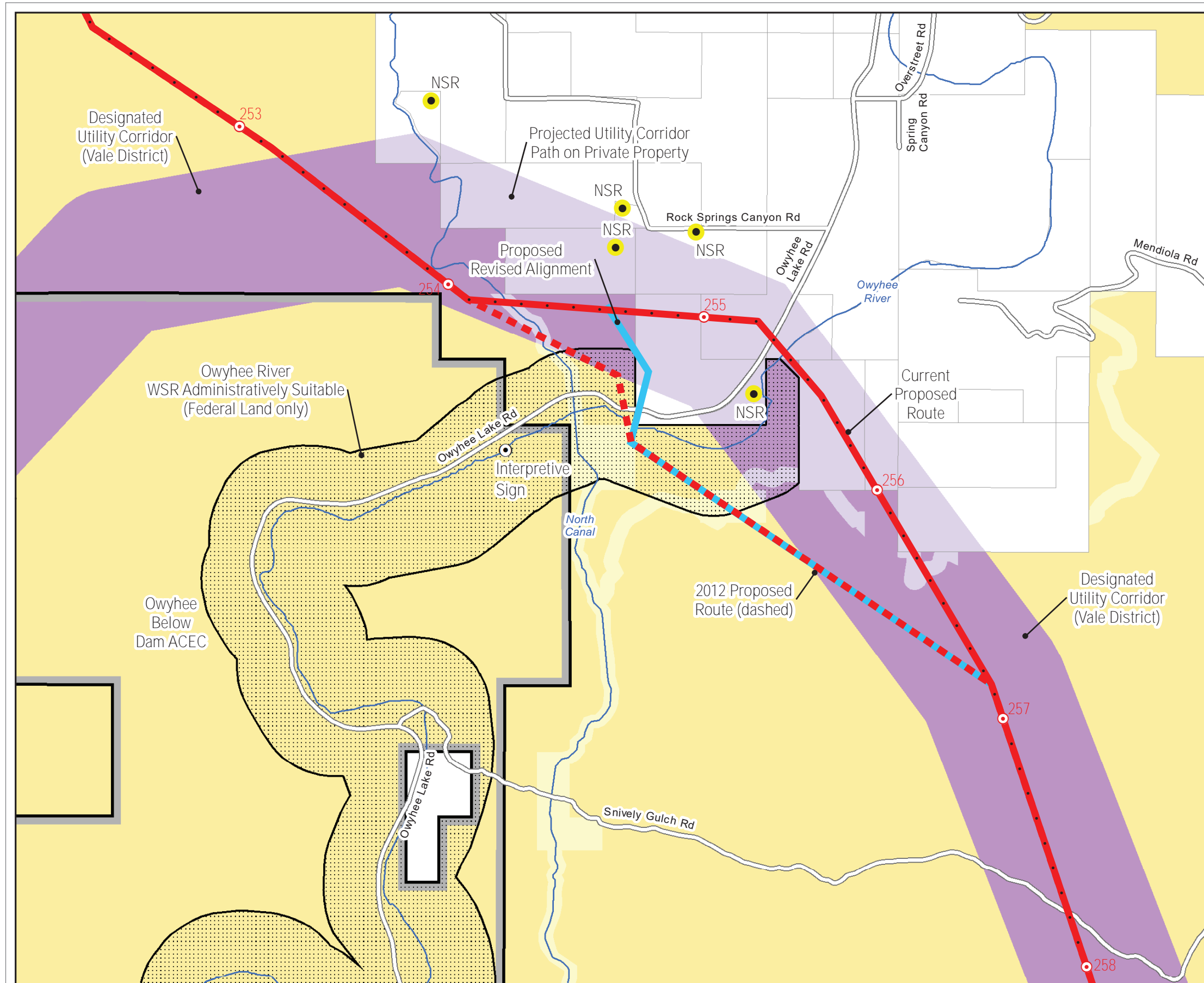
Base Map:
 Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Boardman to Hemingway
 Transmission Line Project

**Area in the Vicinity of the
 Owyhee River Crossing**

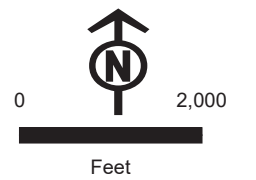
Malheur County, Oregon



- Project Features**
- Proposed Route
 - 2012 Proposed Route
 - Proposed Revised Alignment
 - Mile
 - Tenth
- Designated Utility Corridors**
- Vale District (BLM) Utility Corridor
 - Projected Path of Utility Corridor on Private Property
- Owyhee River WSR**
- WSR Administratively Suitable (Federal Land only)
- Other Features**
- Owyhee Below Dam ACEC
 - Noise-Sensitive Receptor
 - Lower Owyhee Wildlife Watching Interpretive Sign
- Land Status**
- Bureau of Land Management
 - Bureau of Reclamation
 - Parcels (Private)
- Roads**
- River or Canal**

Notes:
 Not intended for construction, or any uses other than intended purpose.

Data Source(s):
 BLM, Esri, Idaho Power, StreamNet



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NUCSITE



Juniper Products by Wes Prouty

(541) 877-2315
Fax: (541) 877-2314
Toll Free: 1-800-585-3121

P.O. Box 138
35188 Vandecar Rd.
Durkee, OR 97905-0138

May 28, 2019

KELLEN TARDAEWETHER
OREGON DEPT. OF ENERGY

RE: B2H. DPOComments:

This letter is to support the proposed route of B2H through the Durkee area of Baker County, Oregon, and the entire route of B2H.

Wesley B Prouty
Wesley B Prouty

TARDAEWETHER Kellen * ODOE

From: jean public <jeanpublic1@gmail.com>
Sent: Monday, June 3, 2019 10:16 AM
To: TARDAEWETHER Kellen * ODOE; DPOComments@oregon.gov
Cc: KOOISTRA Esther * ODOE; B2H DPOComments * ODOE
Subject: public cojmmnt on BoardmantoHemingway transmission line

I DO NOT BELIEVE THIS LINE IS NECESSARY.I BELIEVE IT CUTS INTO NATIONAL LAND LIKE A KNIFE AND HURTS ALL LIVING CONDITINOS FOR ALL ANIMALS

and trees that live in this site. i see no reason to give these givaway programs to utilities anymore. its time to call a halt to these giveaway programs. jean publiee jeapublic1@gmail.com

SUBMIT YOUR COMMENTS AND/OR QUESTIONS

The online comment form is deactivated during the comment period on the Draft Proposed Order (DPO) as part of the Oregon Energy Facility Siting Council (EFSC) review process. Comments must be submitted directly to the Oregon Department of Energy (ODOE) and received no later than July 23, 2019 at 5 pm (PDT) to be included in the record. Oral and written comments are also accepted at [public hearings on the DPO](#).

Written comments may be submitted to the hearing officer, in care of:

Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy

Phone: [503-373-0214](tel:503-373-0214)

Address: 550 Capitol St N.E.

Salem, OR 97301

Fax: 503-378-6457

B2H.DPOComments@Oregon.gov

For direct communication with Idaho Power, please contact Jeff Maffuccio, Facility Siting Coordinator

PO Box 70 Boise, ID 83707

Phone: [208-388-2402](tel:208-388-2402)

JMaffuccio@idahopower.com

INTERESTED IN POTENTIAL CONTRACTING OPPORTUNITIES?

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ADDITIONAL CONTACT INFORMATION

[BUREAU OF LAND MANAGEMENT](#)

Renee Straub, BLM Project Coordinator
BLM Vale District
100 Oregon St.
Vale, Oregon 97918
Phone: [541-473-6289](tel:541-473-6289)
[E-mail Renee](#)



U.S. FOREST SERVICE

Wallowa-Whitman National Forest
David Plummer
Phone: [541-523-1261](tel:541-523-1261)
[E-Mail David](#)



[Questions about](#)

TARDAEWETHER Kellen * ODOE

From: Rebecca Carey-Smith <Rebecca.Carey-Smith@pgn.com>
Sent: Friday, July 12, 2019 4:26 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Boardman-Hermiston Line
Attachments: EFSC Boardman-Hermiston Line.pdf

Good afternoon:

Attached please find PGE's letter in support of the Boardman to Hermiston permit application. Please contact me if you have any questions.

Best regards,
Rebecca



Rebecca Carey-Smith

State Government Affairs, Portland General Electric
Rebecca.Carey-Smith@pgn.com • 503-382-7824 (m)
PortlandGeneral.com



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

July 11, 2019

To: Energy Facility Siting Council
cc: Todd Cornett, Oregon Department of Energy
Kellen Tardaewether, Oregon Department of Energy
B2H.DPOComments@Oregon.gov
Re: Proposed Boardman to Hemingway Transmission Line

Dear Council Members:

We are writing to express our support for the Boardman to Hemingway (B2H) transmission line, which will help incorporate intermittent renewable energy resources and is one of many important steps in addressing capacity constraints across the Pacific and Mountain West.

PGE is working diligently to help Oregon and our customers achieve a clean energy future and address the growing threat of global warming. To that end, we have set a decarbonization goal to reduce greenhouse gas emissions on our system by more than 80% and are investing in new renewables, like the Wheatridge wind-solar-storage facility in Morrow County. To achieve Oregon's clean energy future in a cost-effective manner that keeps the electric system stable and reliable, the transmission and distribution system across the west must be able to effectively incorporate intermittent and distributed resources.

In looking at the regional electric system, the B2H line will add much needed capacity, which is critical to the successful integration of additional renewables to meet Oregon's clean energy goals. Specifically, this line will help facilitate transfers between resource rich areas in times of excess and in times of need, providing a new pathway to sell excess energy to the Mountain West in the summer

Thank you for the opportunity to submit comments in support of Idaho Power's application to permit and build the B2H line. We respectfully encourage the approval of their application.

Sincerely,

A handwritten signature in black ink, appearing to read "Sania Radcliffe". The signature is fluid and cursive, written in a professional style.

Sania Radcliffe
Director, Government Affairs & Environmental Policy
Portland General Electric

August 19, 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

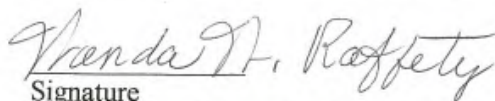
I appreciate the opportunity to comment on the Draft Project Order for the Boardman to Hemingway Transmission Project. I am very supportive of the Oregon California Trails Association (OCTA) and the work that they have done to protect the Oregon Trail, especially here in Oregon. OCTA is mentioned numerous 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: Wanda W Raffety

Mailing address: 1198 D Street, Baker City, OR 97814-2951

Email address: wraffety6@yahoo.com
phone number: (optional) 541 523 2551

August 19, 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:

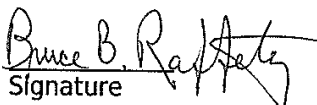
1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center 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: Bruce B Raffety

Mailing Address: 119 D Street, Baker City, OR 97814-2951

Email: wraffety6@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:

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:

Donna Rainboth

Mailing Address:

69565 Antles Ln
Cove, OR 97824

August 15, 2019

Energy Facilities Siting Council
% Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301

Subject: Idaho Power Company's Application for Site Certificate for B2H Transmission Line

To: Chairman Beyeler and Members of the Council

My family and I have lived in Union, OR since 1974, County of Union, and region of Northeast Oregon. I was a member of the Union County Citizens Advisory Board for the B2H Transmission Line for a period of time and have a reasonably full knowledge of the proposed project.

It is my opinion that there are many inaccuracies in the application presented by Idaho Power Company as well as incomplete analysis in other areas. I know that this application should not have been accepted as complete and therefore a draft proposed order should not have been prepared. That would dictate that you must stop the siting process and back up to get the application process finalized first. I base my position on several errors and mistakes that are prevalent in the failed application which also influenced the draft proposed order.

APPLICANT FAILED TO FULLY AND ACCURATELY ANALYZE THE FOLLOWING:

Problem 1: The Draft Proposed Order was prepared prematurely because the application failed to include all of the information to fulfill the analysis of the noise standards. 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

Energy Facilities Siting Council
August 15, 2019
Page 2

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.

Problem 2: Clear-cutting of timbered land under the transmission corridor would present certain problems in the application and the site certificate cannot be issued until these issues are cleared up. The conclusions provided by the applicant in section 8.0 are not accurate; without merit. Specifically, 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.

Problem 3: The problem of noxious weeds is ongoing and is exacerbated whenever native vegetation is disrupted as with a construction project. There are a number of undesirable species that will appear within a year of ground disturbance, should this line be installed. Once the weeds arrive they will expand their territory into land adjacent to the right-of-way. The applicant does not intend to comply, as required, with Oregon statutes. OAR-345-025-0016 states "in the site certificate, the Council shall include conditions that address monitoring and mitigation to assure compliance with standards contained in OAR Chapter 35, Division 22 and Division 24."

Idaho Power claims no responsibility for weeds outside the right of way (ROW) or those present outside the project that are likely to spread, even though the weeds at the site would disperse to areas outside the ROW. Furthermore, there is no assurance that noxious weeds at the site *would not* be allowed to go to seed. This cannot stand.

General Conclusions:

From the beginning, the B2H project has been beset by problems. It is very likely that Idaho Power Company doesn't even need the power they covet. And, then they don't propose any new substations at any of the population centers in Oregon. Places like La Grande would have no connection to B2H. That is how one-way Idaho Power Company behaves as it expects Oregon to give them a right-of-way. And, at the present time it would appear that my family would get to help pay for a line that isn't going to connect to our system.

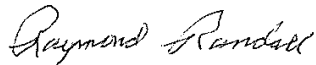
Energy Facility Siting Council
August 15, 2019
Page 3

Conclusion:

It is not possible for me to understand why EFSC and the DOE in Oregon would give favorable consideration to a for-profit company from a neighboring state when we would get nothing of value in return. We would get the visual and environmental degradation and it has no appearance of any mutual benefit.

I strongly advise that you should deny a site certificate for B2H. To grant a site certificate would be a great disservice to Oregon.

Sincerely,



Raymond Randall
765 South 3rd
Union, OR 97883

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

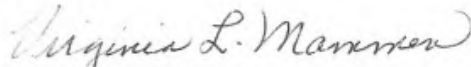
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

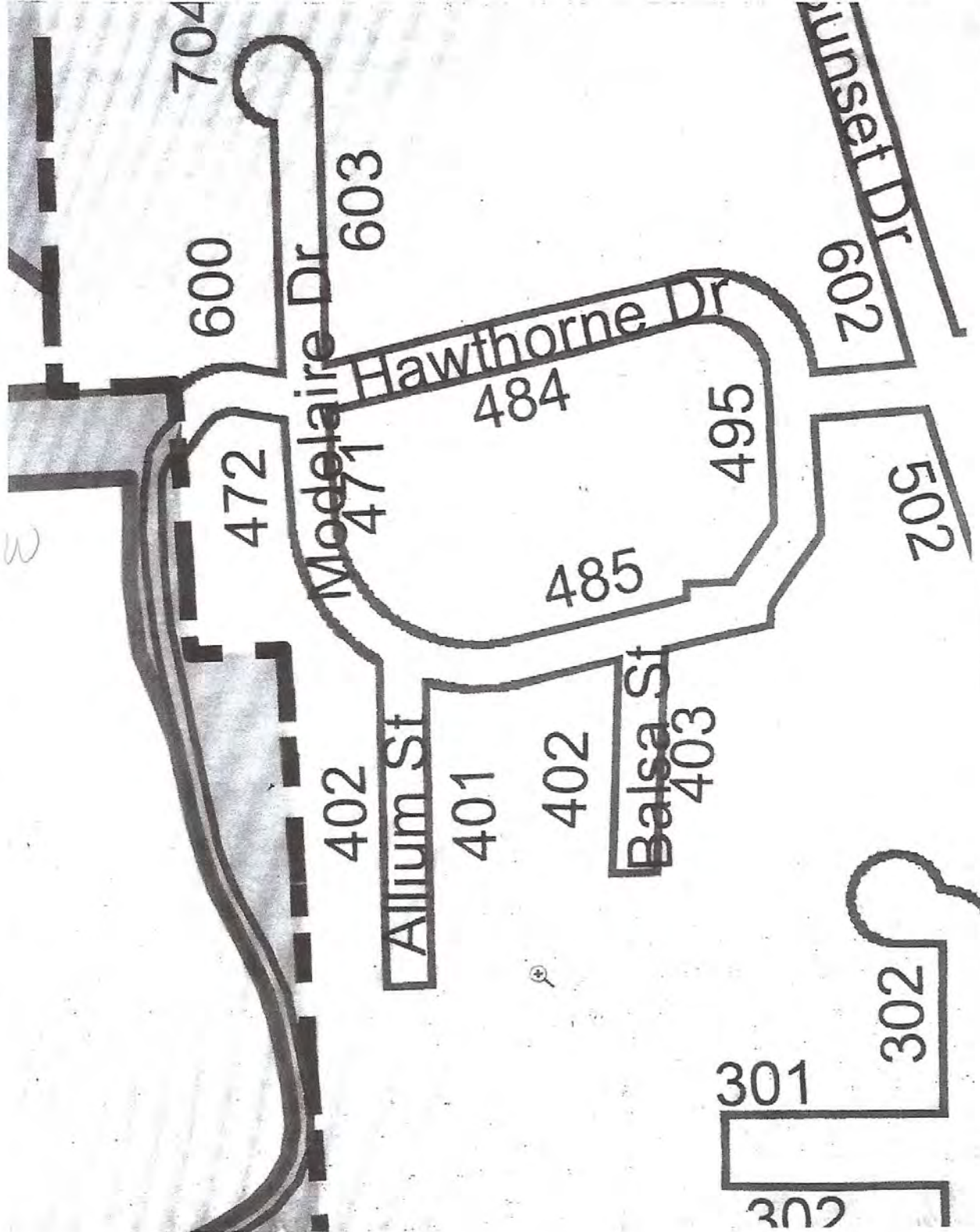


Exhibit 3

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

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



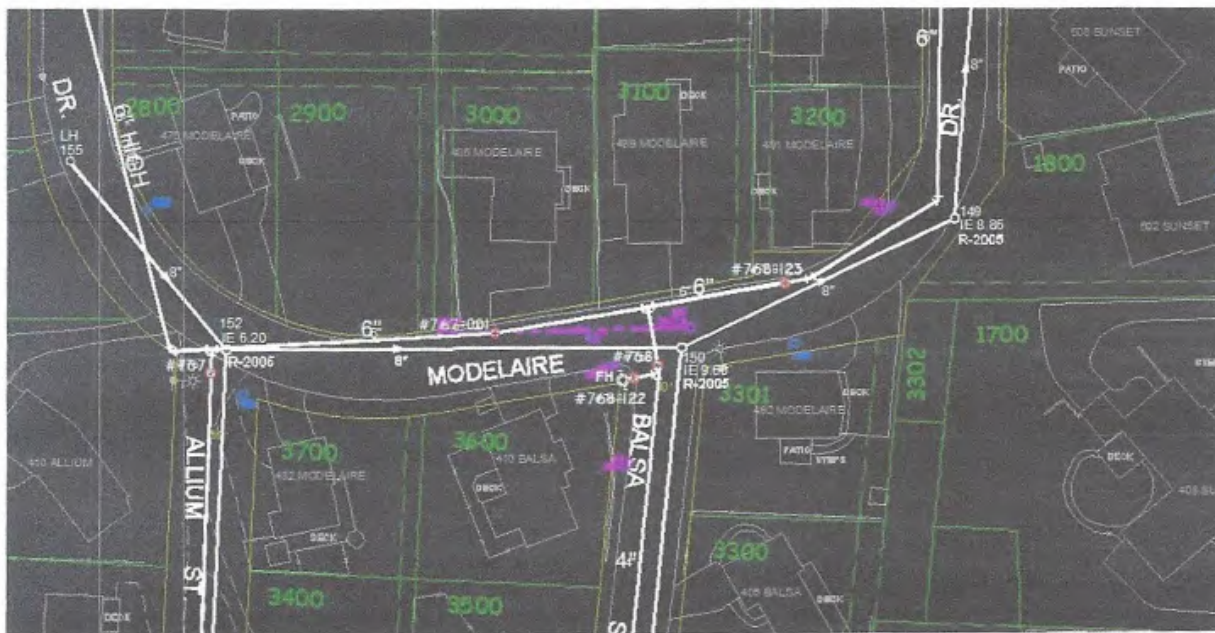
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

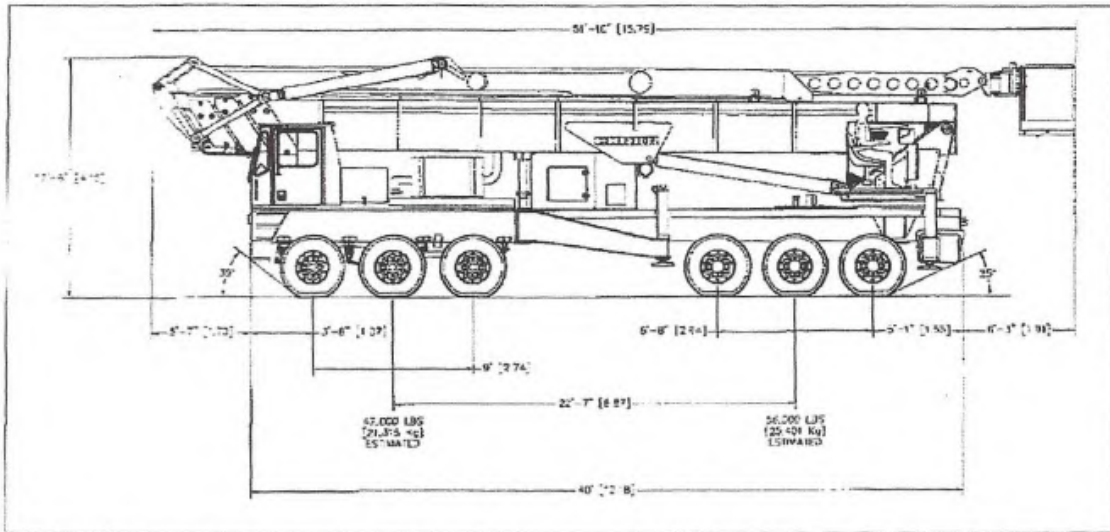


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

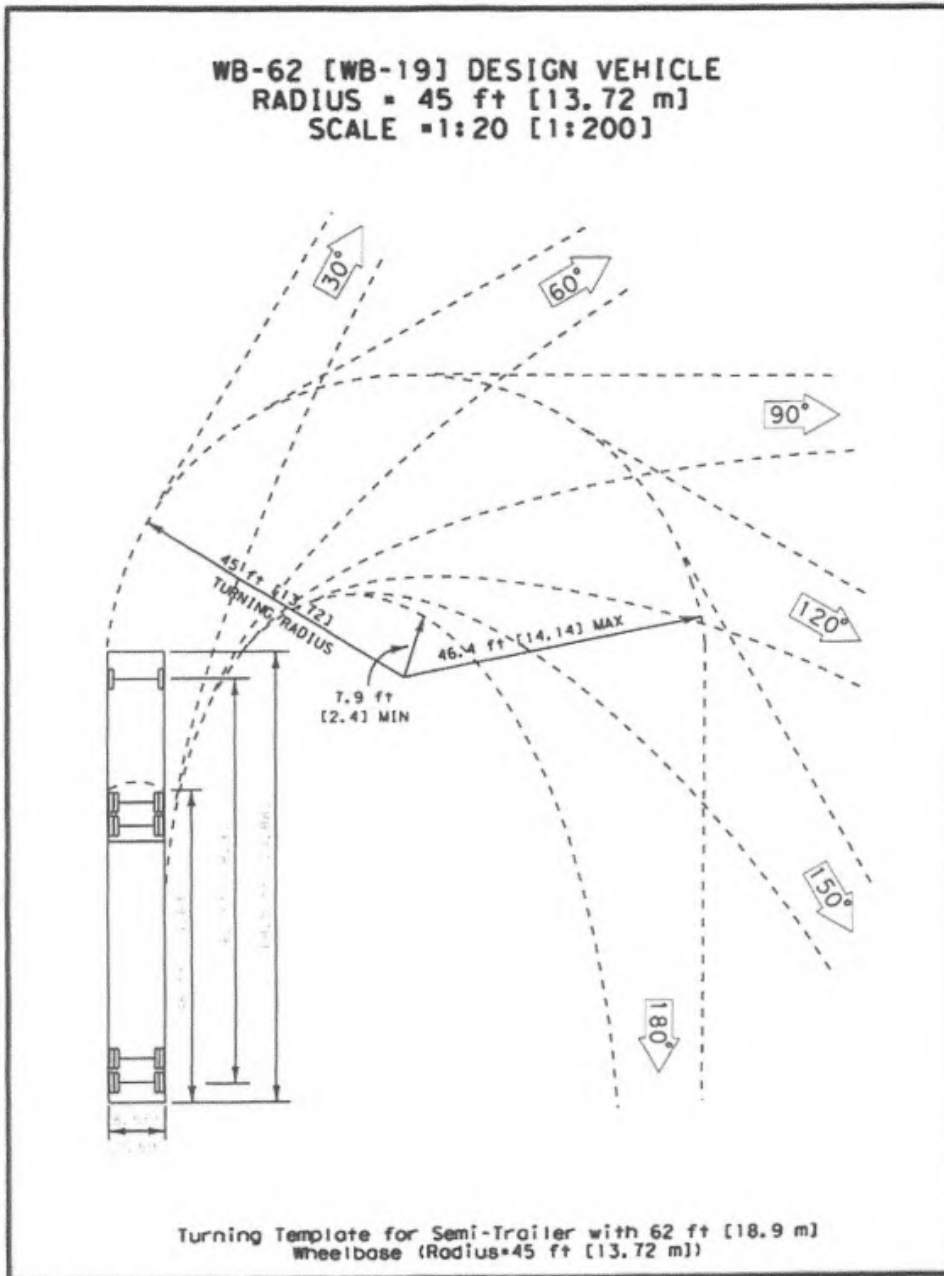


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

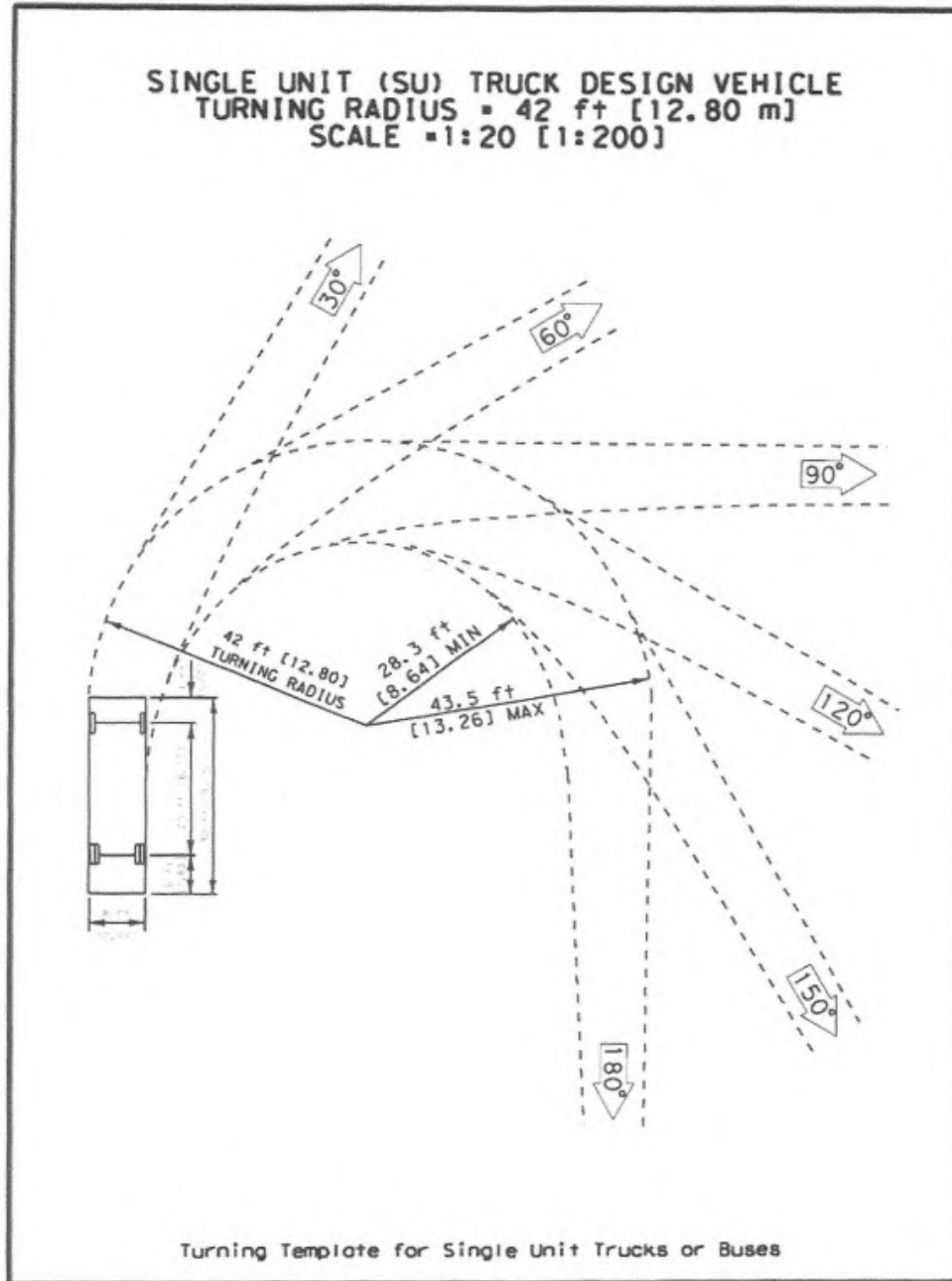


Exhibit 15

**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.

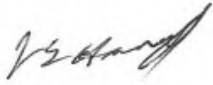
Section 17. TRUCK ROUTES

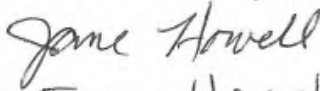
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

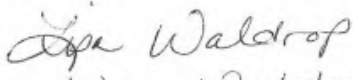
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

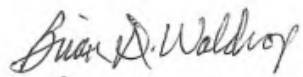
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

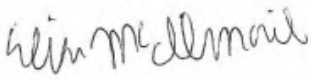
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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
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 mcilmail151@hotmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

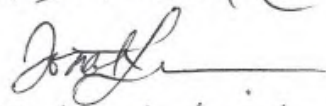

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

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EMAIL


Jonah Lindeman
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jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner
Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

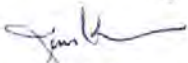
ADDRESS


EMAIL

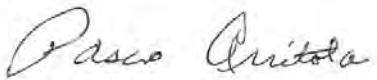
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

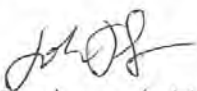
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SIGNATURE 
PRINTED NAME D. Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL d mammen @ coni. com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

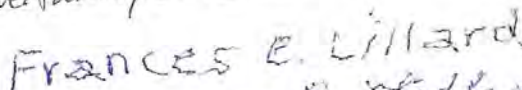
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande OR
EMAIL jtol@charter.net


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

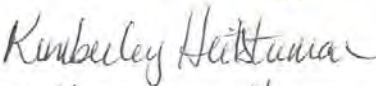
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, LA Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

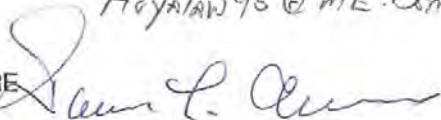
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

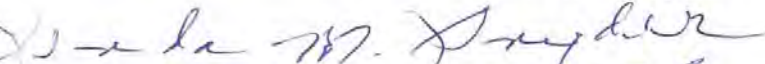
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

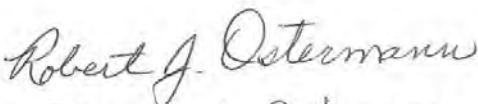
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL Kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL HoyalaW95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

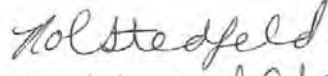
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

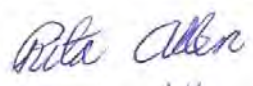
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

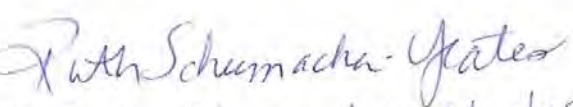
SIGNATURE 
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ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

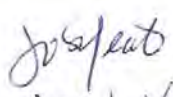
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

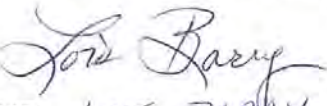
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

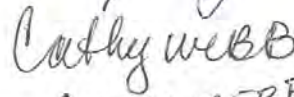
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

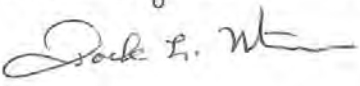
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
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EMAIL ruthschumacheryeates@gmail.com

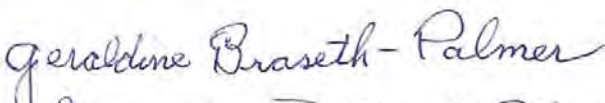

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

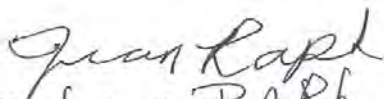
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SIGNATURE 
PRINTED NAME Lois BARRY
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EMAIL loisbarry31@gmail.com

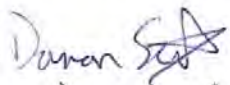
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

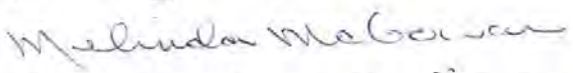
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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EMAIL 


SIGNATURE 
PRINTED NAME Jean RAPH
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EMAIL Jraph19@gmail.com

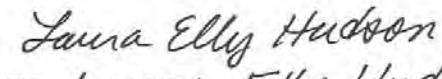
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SIGNATURE 
PRINTED NAME Damon Sexton
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE 
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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
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SIGNATURE *Anne G. Cavinato*
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SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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EMAIL joehorst@ecni.com

SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
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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
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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EMAIL hnull@comi.com

SIGNATURE *Bert R. Frewing*
PRINTED NAME Bert R. Frewing
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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
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SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C*
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EMAIL bruce.kevan@lagrandesd.org

SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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EMAIL carolsummers1935@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 NTH St. LaGrande - OR 97850
EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 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.

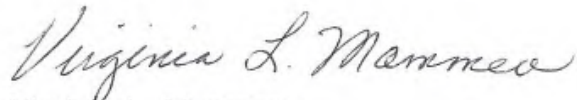
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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,

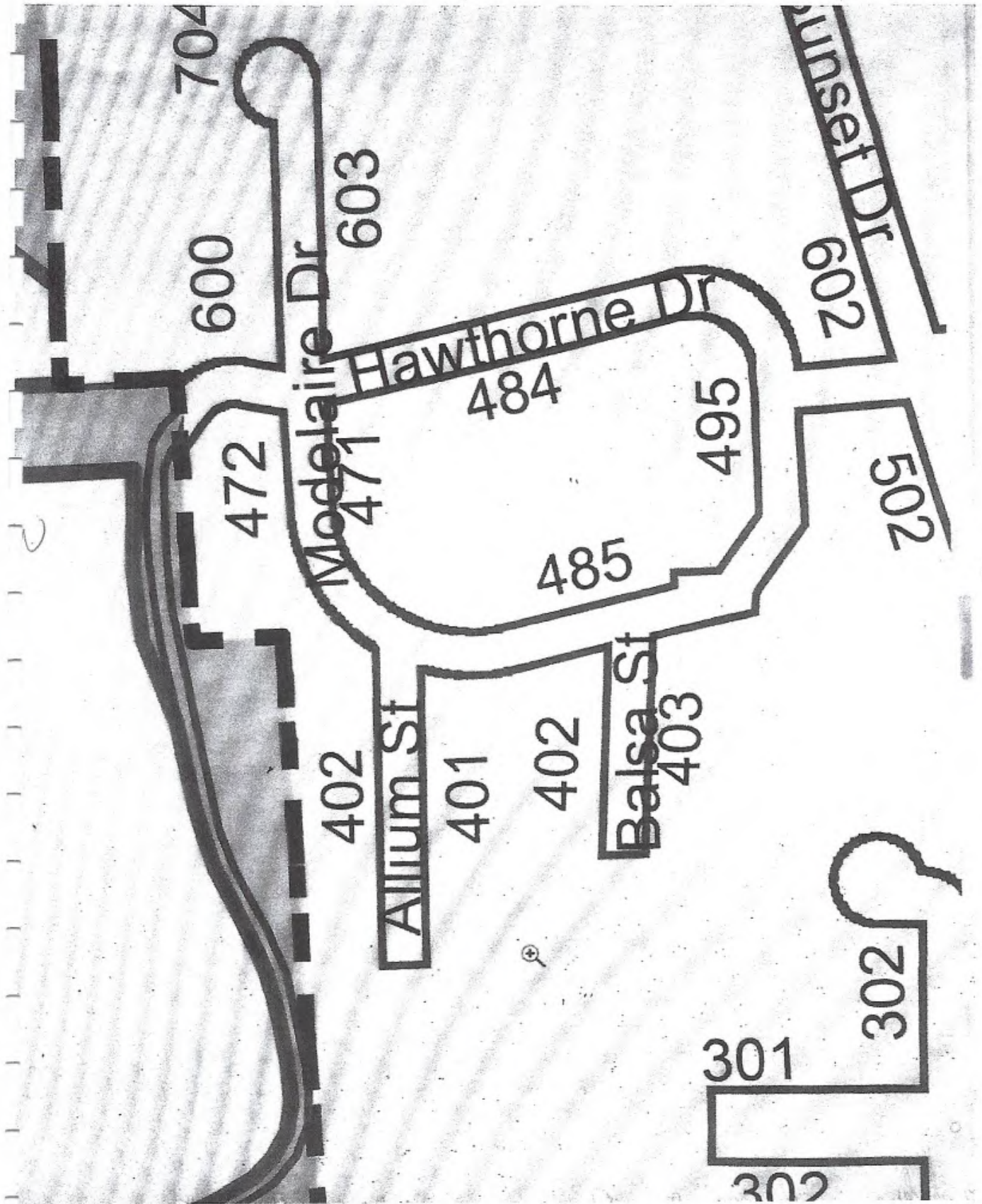


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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.

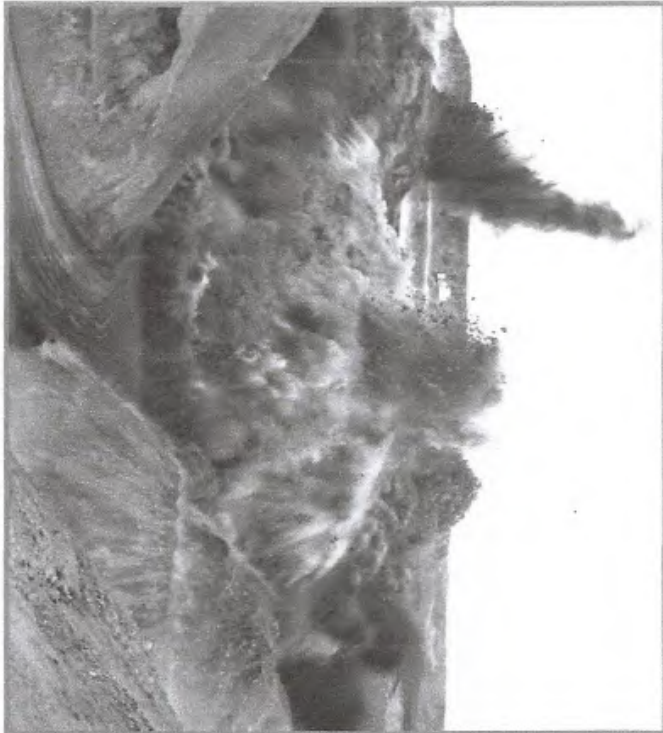
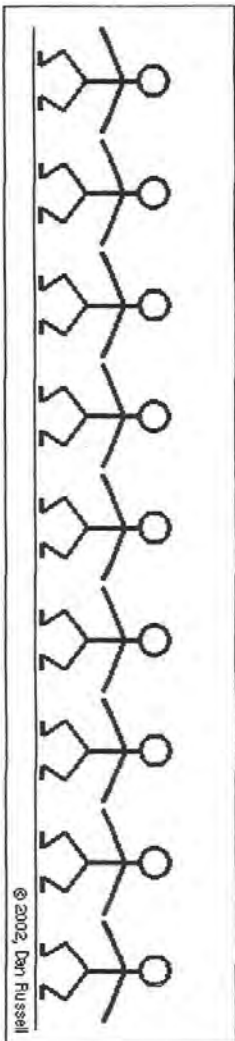


Exhibit 56

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.

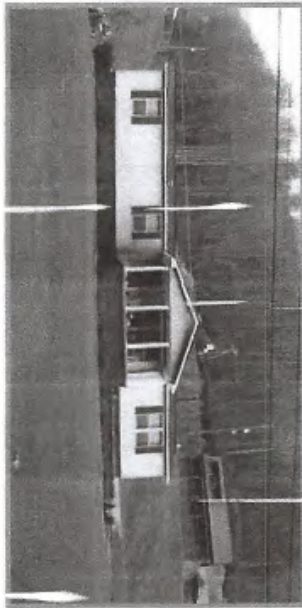
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

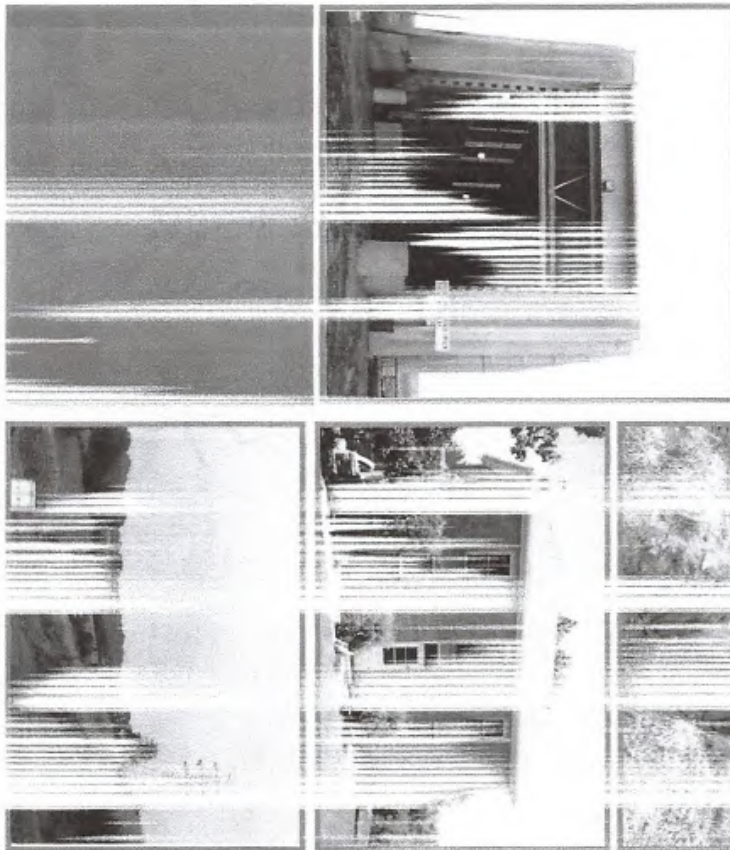
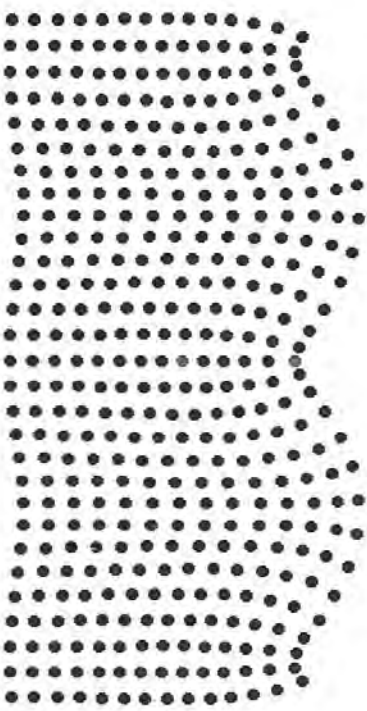


Exhibit 5D

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.

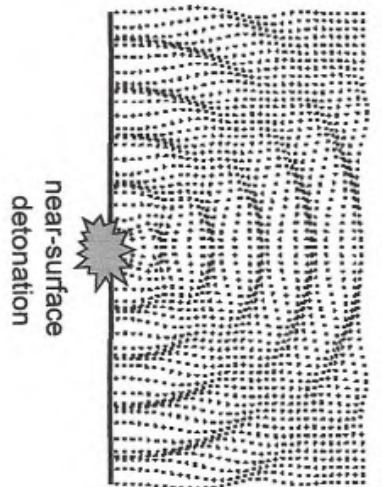
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

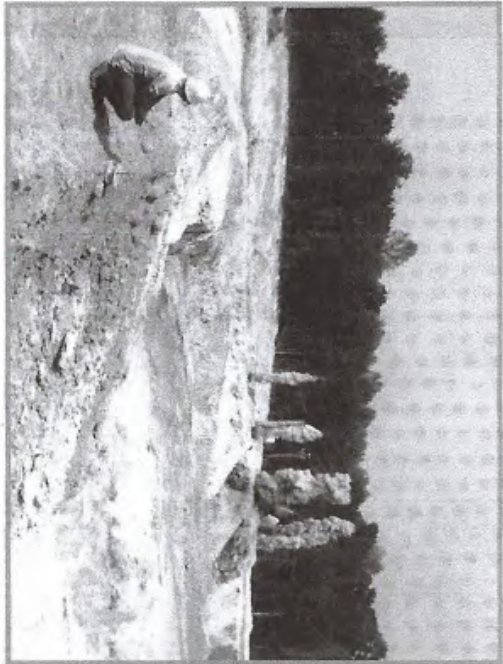
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or 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

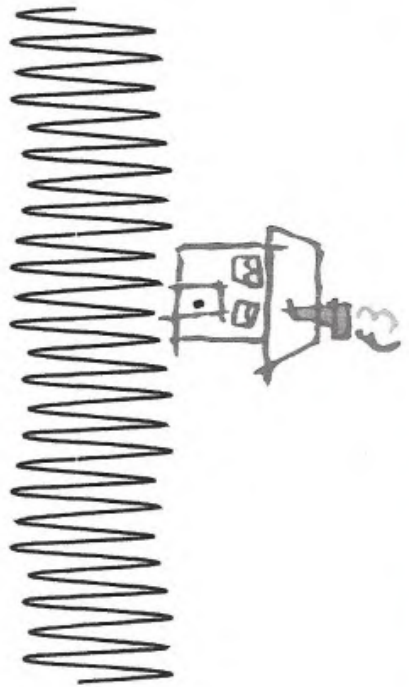
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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

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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

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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

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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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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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](#)

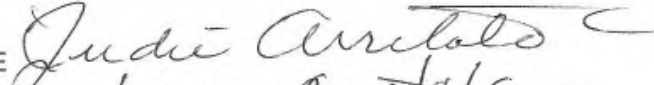



SCIENCE
NEWS


EXPERT
OPINION

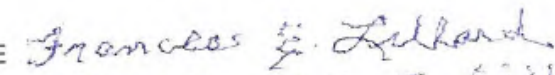
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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.

SIGNATURE 
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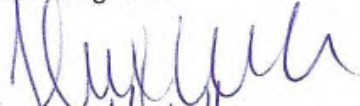
SIGNATURE 
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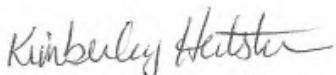
SIGNATURE 
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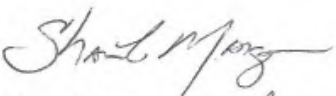
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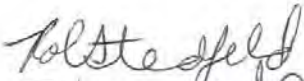
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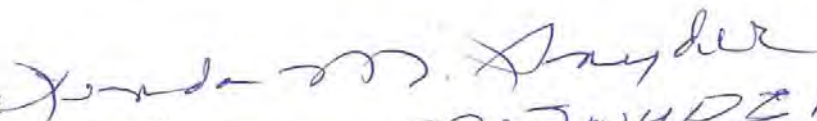
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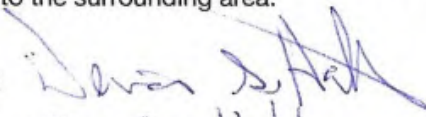
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SIGNATURE



PRINTED NAME

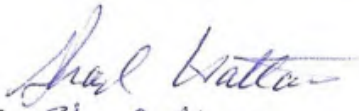
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Shad Hattan

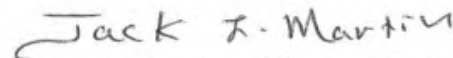
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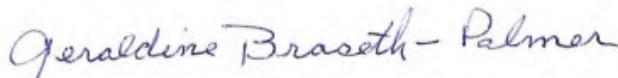
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SIGNATURE



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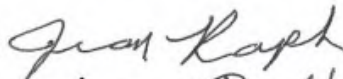
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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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) Chris Rauch
Mailing Address (mandatory) 72967 Strawberry Ln
Lexington, OR
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
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 38

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

Page 42

1 a lease with another company. I'm wondering how that's
2 going to be handled. And that lease could have
3 something be built on it? And if that is built, what
4 happens then to the power line? Where does it go?
5 And that's pretty much it at this point.
6 Unless somebody wants to answer the questions.
7 HEARING OFFICER WEBSTER: Unfortunately, no
8 real answers tonight, just testimony from the public.
9 MR. CHRIS RAUCH: Yeah, I know.
10 HEARING OFFICER WEBSTER: Thank you though.
11 Next up, Irene Gilbert.
12 MS. IRENE GILBERT: Irene Gilbert, Stop B2H
13 member. And first I want to make -- oh, 2310 Adams
14 Avenue, La Grande, Oregon.
15 First, actually, today I'm just going to make
16 some general comments about different areas of the
17 application. But I also wanted to remind the folks
18 here -- I know you don't deal with me that much -- but
19 when people talk about restrictions on the transmission
20 line, I just wanted to remind you that a lot of the big
21 players, like Google, Target, Walmart, Home Depot, all
22 those big companies are trying to get off the grid.
23 They're wanting to develop their own energy sources.
24 There are lots of litigation things going on in
25 different states now because the utilities don't want

Page 43

1 them to leave the grid or be able to do that. So
2 anyway, that really counters the idea that we're going
3 to have this huge influx of electric need.
4 Also, the FERC requirement that new renewables
5 have a consistent level of energy coming onto the grid
6 has resulted in, as you well know, a lot of the wind
7 developers are asking to have solar and batteries added
8 to their development so that they can have consistency
9 in the energy that they're providing.
10 So those kinds of things are going to mean
11 that the projections for this huge need for transmission
12 lines is somewhat overstated.
13 Now, I've been a member of a farming family,
14 ranching family. And in the Willamette Valley, we
15 raised a lot of cattle, we raised feed for them, we grew
16 trees, we harvested trees. We provided habitat for
17 western pond turtles and endangered species of fish, all
18 kinds of wildlife.
19 And I can remember at one point having to sit
20 around the table and having one of my sister-in-laws
21 say, I wonder how many cows we would have to raise to
22 make any money. We were selling 200 cows every fall and
23 the prices were so bad that we were thinking, if we
24 raise more will we start making money or how does this
25 work?

Page 44

1 A lot of these farmers and ranchers, the
2 average for these smaller developments -- we weren't
3 small, we had a thousand acres, that's a lot in the
4 Willamette Valley -- but here, a lot of these people,
5 according to the data, says they're living on an average
6 of like \$22,500 a year.
7 So I can appreciate this line would make jobs
8 for some electricians, and I can appreciate that they
9 would like that. But it also can take away the jobs and
10 the livelihood of a lot of farmers who understand they
11 don't own the land they're on; they are the caretakers
12 of that land. The land owns them. And they're here
13 trying to protect what is -- well, it's just the basis
14 of their entire existence.
15 So having said that as kind of an
16 introduction, I'd like to remind you that whatever you
17 put in the site certificate, if indeed you get a site
18 certificate issued, is all that Idaho Power is going to
19 be required to do.
20 So when you don't have final plans for things
21 like fire, and you say it's going to be developed after
22 the fact, you are leaving all of these people very
23 vulnerable because they had no input in what the final
24 product looks like. It's my observation that you have
25 accepted some very bare-bones kinds of plans, and say,

Page 45

1 We'll work it out later. Idaho Power is going around
2 telling people, We'll work it out later.
3 They got 31 issues from the weed folks in five
4 counties that they have felt should be in that plan.
5 Those things are not in the plan. And Idaho Power is
6 telling people, they're telling our commissioners, We'll
7 work it out later. We'll talk about it after the site
8 certificate is issued.
9 We all know that if people don't ask for a
10 contested case now, by the time those things happen,
11 it's too late. And all of these people that are
12 concerned about it will have nothing. They wouldn't
13 even be notified of what kinds of final plans get
14 approved. So it's a pretty unbalanced kind of system.
15 And a few things I just wanted to just comment
16 about are notification of people. When you notify
17 people within 250 feet of a transmission line that this
18 line is going to go in, there are a whole lot of people
19 that are being directly impacted who don't even know,
20 who were never notified. It's not a just kind of
21 notification.
22 I am concerned about groundwater and the
23 groundwater impacts. You heard something about that
24 here from one of these farmers. But when you bring in a
25 bunch of equipment and you start -- one thing, you



Ms. Annie Ray
5806 SE Rhone St
Portland, OR 97206

PORTLAND
OR 972
16 AUG 2019
PM 3 L



Energy Facilities Siting Council
c/o Keller Tapscott
Oregon Dept Energy
550 Capital St. NE
Salem, OR 97301

RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

97301\$3742 0009



August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

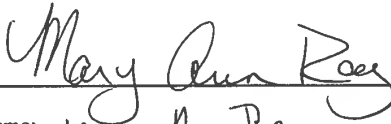
Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,



Name: Mary Ann Ray

Address:

~~██████████~~
5806 SE Alano St
Portland, OR 97206

TARDAEWETHER Kellen * ODOE

From: Rep Findley <Rep.LynnFindley@oregonlegislature.gov>
Sent: Wednesday, June 26, 2019 1:37 PM
To: B2H DPOComments * ODOE
Cc: Jordan Bice
Subject: B2H Project Public Comment
Attachments: B2H Public Testimony Letter.pdf

Dear Mr. Tardaewether,

Attached are Representative Lynn Findley's comments on the Boardman to Hemingway Project. If you have any questions, please feel free to reach out to our office.

Regards,

Tanner Lloyd
Legislative Director
Representative Lynn Findley – HD 60
503-986-1460 | H-475
Tanner.Lloyd@OregonLegislature.gov

LYNN P. FINDLEY
State Representative



DISTRICT 60
Baker, Grant, Harney
Malheur, and part of
Lake County

OREGON HOUSE OF REPRESENTATIVES

June 26, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

Subject: Boardman to Hemingway Project Public Comment

Dear Mr. Tardaewether,

As clean energy standards take effect in Oregon and utilities move away from traditional sources like coal, electrical transmission upgrades are becoming increasingly important to our region's infrastructure. We are in need of a robust electrical grid to balance energy demand and intermittent wind and solar generation across multiple regions.

The Boardman to Hemingway (B2H) transmission line will help meet that need. I will support the permitting and construction of the project contingent upon a route change.

This project will benefit customers across the Pacific Northwest and Mountain West regions. It will deliver clean energy in the winter months to the Northwest and give the Northwest's independent energy generators and utilities a path to sell excess energy to Mountain West customers during the summer.

In addition to maximizing clean energy resources, B2H is a low-cost way to solve the constraints from population growth in the Pacific Northwest and the Mountain West. B2H will free up capacity on existing, lower-voltage transmission lines running through eastern Oregon. This will provide economic development opportunities creating jobs and expanding opportunities to my constituents.

Although there are many benefits, I am concerned with the preferred route Idaho Power chose as it directly contradicts the local land-use laws regarding farmland in Malheur County. These laws specifically prohibit the installation of transmission lines on farmland and interfere with fundamental agriculture practices such as irrigation and aerial application of pesticides and herbicides. Installing transmission lines in certain fields could render them useless and severely limit farmers' livelihoods.

LYNN P. FINDLEY
State Representative



DISTRICT 60
Baker, Grant, Harney
Malheur, and part of
Lake County

OREGON HOUSE OF REPRESENTATIVES

I support the general concept of B2H and concur that there is a definite need to improve our electrical grid. However, my hope is that we can move forward without hurting our local farmers. If the route is changed to address these problems, the project will have my full support.

Please contact my office if you have further questions.

Sincerely,

A handwritten signature in blue ink that reads "Lynn P. Findley". The signature is stylized and includes a flourish at the end.

Lynn P. Findley

KARIN POWER
STATE REPRESENTATIVE
DISTRICT 41
MULTNOMAH AND CLACKAMAS COUNTIES



RECEIVED
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Department of Energy

HOUSE OF REPRESENTATIVES

Members of the Energy Facility Siting Council:

Clean energy will make our state and the rest of the country safer, healthier and more prosperous. To get there, we need projects like the Boardman to Hemingway transmission line.

Many clean-energy resources are intermittent. Wind turbines only produce power when the wind is blowing. Solar panels only work when the sun is shining. Transmission projects like Boardman to Hemingway will help balance the system by moving clean energy from where it's produced to the customers who use it.

For example, wind and hydro plants in the Pacific Northwest produce plenty of clean energy in the summer. That's right when irrigators and air conditioners cause demand to peak in the Mountain West. However, existing lines between the two regions are already carrying as much power as they can. Boardman to Hemingway will relieve that constraint, adding approximately 1,000 megawatts of capacity in both directions. That will help energy companies like PacifiCorp and Idaho Power buy more clean energy from the Pacific Northwest and rely less on coal or natural gas, thus supporting the state of Oregon's carbon reduction goals.

And customers in my district will benefit in the winter time when our energy use peaks. We'll be able to buy clean solar energy from the desert Southwest or other resources to the east and south to heat our homes and businesses.

That's why transmission projects like Boardman to Hemingway are so important to the clean-energy future I and my legislative colleagues envision for Oregon and the nation. They make wind, solar and other clean energy sources available without sacrificing reliability or affordability. Please consider these benefits to our communities as you weigh the merits of Boardman to Hemingway, and vote to issue a site certificate for the project.

Thank you and please don't hesitate to contact me if you have any questions.

Sincerely,

State Representative Karin Power

TARDAEWETHER Kellen * ODOE

From: Crane Nicole <Nicole.Crane@oregonlegislature.gov>
Sent: Friday, June 28, 2019 12:12 PM
To: B2H DPOComments * ODOE
Subject: Letter of Support of B2H Transmission Line
Attachments: B2H Transmission Line.pdf

Kellen,

Please find the attached letter to the EFSC in support of the Boardman to Hemingway project from Representative Greg Smith.

Thank you,
Nicole



Nicole Crane

Legislative Director
Representative Greg Smith
Oregon House District 57
(O) (503) 986-1457
900 Court Street, Office H-482 | Salem OR, 97301
<https://www.oregonlegislature.gov/smithg>



The Honorable Greg Smith
Oregon House of Representatives
District 57

June 28, 2019

Members of the Energy Facility Siting Council,

As clean energy standards take effect in Oregon, and as utilities move away from traditional sources like coal, electrical transmission upgrades are becoming more important than ever. We need a more robust electrical grid to balance energy demand and intermittent wind and solar generation across multiple regions.

The Boardman to Hemingway (B2H) transmission line will help meet that need. We support the permitting and construction of the project.

Customers across the Pacific Northwest and Mountain West will benefit from the project. It will deliver clean energy in the winter months to the Northwest and give the Northwest's independent energy generators and utilities a path to sell excess energy to Mountain West customers during the summer. In addition to maximizing clean energy resources, B2H is the lowest-cost way to solve the constraints that could result from population growth in the Pacific Northwest and the Mountain West. B2H will also free up capacity on existing, lower-voltage transmission lines running through eastern Oregon. This will provide economic development opportunities that create jobs and expanded opportunities to our constituents.

Construction of B2H will lead to increased spending at businesses in eastern Oregon, bringing an immediate economic benefit to the area. The line will also generate more than \$4 million in property tax revenue every year.

Idaho Power, in its work to acquire permits for B2H, has demonstrated that it is a responsible corporate partner. For more than 10 years, the company has worked hard to find the most beneficial route for the line. This includes meeting with hundreds of our constituents, listening to their concerns and adjusting route options in response.

These are a few of the reasons we support B2H. We hope the Energy Facility Siting Council also recognizes that B2H will benefit customers, businesses and local governments in Oregon and vote to approve a site certificate for the Boardman to Hemingway transmission line as soon as possible.

Best Regards,

Representative Greg Smith

Mad S. P. Holden
1701 1st St.
La Grande, OR
97850

Kellen Tardawethen, Senior Siting Analyst
Oregon Energy Facility Siting Council
Oregon Dept. of Energy
550 Capitol St, NE
Salem, OR 97301

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AUG 19 2019

DEPARTMENT OF ENERGY

FROM LAND ON 5/2
17 AUG 2019 PM 4 L



97301-374299



1701 1st Street
La Grande, OR 97850-1503
August 17, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Energy Facility Siting Council
Oregon Department of Energy
550 Capitol St., NE
Salem, OR 97301

In re: Idaho Power Application for the Boardman to Hemingway (B2H) Transmission
Project September 28, 2018: Draft Proposal Order May 23, 2019
Slope Instability

Dear Chairman Beyeler and Council Members:

I was uncertain about moving into Oregon when we arrived here a year ago. However, I especially like living in La Grande and have become somewhat active with the Art Center East readings. Many La Grande residents have made me feel welcome. I also feel healthier here, especially because Oregon seems to be a healthy environment.

But I recently heard about B2H. This proposed transmission line construction frightens me. It reveals Idaho Power's blatant disregard for La Grande residents, wildlife ecosystems, and wildfire hazards. In fact, although the ***Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN*** appalls me, ***Idaho Power's neglect to consider the active fault in the West Grande Ronde Valley Fault Zone appalls me even more. It threatens all La Grande residents and wildlife.***

Its proposed route to the west of La Grande is on an unstable ridge noted for its high risk of landslides. Idaho Power's geologic study also references several studies (below) that illustrate this.

Table H-2: USGS Quaternary Faults within Five Miles of Project by County (on page H-12) is to be placed on **an active fault** in the West Grande Ronde Valley Fault Zone. Further, Exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, indicates much of the erosion hazard is rated "**severe.**" The following quotes part of this report:

To Chairman Beyeler
Page Two

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 Decon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in *Ferns* and others (2010).” Although the study’s two map sets agree overall, differences occur in the limits of some landslide and alluvial fan locations. Further, the *SLIDO* or *Ferns* and others (2010) neglects to include one landslide location near Towers 106/3 and 106/4 from Schlicker and Deacon (1971). However, Appendix E’s Landslide Inventory includes *SLIDO* and Schlicker and Deacon (1971) mapped landslide and alluvial fan limits.

This slope instability remains a crucial concern. In 2014, significant rainfall on the logging disturbance of soil upslope from the town resulted in a catastrophic mudslide in Oso, Washington. Forty-three persons died in this catastrophe. Ignoring geologists’ warning could result in a similar disaster here in La Grande, especially when the **Grande Ronde Hospital and Clinics (this region’s critical access unit) employing hundreds of employees, lies down slope from the B2H line.**

In the same vein, La Grande High School and Central Elementary School are also down slope from the proposed towers, along with at least, 100 homes. Schlicker and Deacon’s 1971 maps, “*Engineering Geology of the La Grande Area, Union County, Oregon*, also deem the hillside’s **entire** area a “landslide area” in the La Grande SE quadrangle. **Constructing a transmission line there is a reckless endeavor.**

Next, *Exhibit G Materials Analysis, Attachment G-5 FRAMEWORK BLASTING PLAN, DESIGN FEATURES* fails to specify the “**high-fire danger periods**” and “**extreme fire danger periods**” in accordance with the **Oregon Department of Forestry**. Even though the Attachment (on page five at 3.3 Safety Procedures, 3.3.3 Fire Safety) provides that “Fire Suppression Personnel have been previously identified in the Fire Suppression and Prevention Plan as a “Watchman,” this wording remains insufficient to minimize fire risks.

Verisk Wildlife Risk analysis rates Oregon the **Eighth Most Wildfire Prone state in the United States**. Likewise, Joe H. Scott, Julie Gilbertson-Day, and Richard D. Stratton’s “Exposure of Human Communities to Wildfire in the Pacific Northwest” ranks La Grande among the **top Fifty Oregon communities with the highest “cumulative housing-unit exposure to wildfire.”**

According to *National Geographic Magazine*, wildfires may spread as fast as 6.7 miles per hour in forests and 14 miles-per-hour in grasslands. The B2H proposal puts lines about 2,000 feet or less than half a mile from La Grande’s city limits, including its

To Chairman Beyeler
Page Three

medium density housing and Grande Ronde Hospital. A fire moving from the B2H lines could spread to La Grande's residential areas and Hospital within 10 minutes. La Grande residents would have little time to react. .

Finally, because the present Boardman to Hemingway Transmission Line proposal fails to adequately resolve the strong potential of resulting landslides and because it fails to adequately analyze and protect against wildfire risk, **it remains unacceptable**, especially to those of us living within its immediate vicinity. Each route it proposes remains unsafe to La Grande citizens, their children, those recuperating and working in the Grande Ronde Hospital, and to the surrounding wildlife and ecosystems.

Please prohibit this reckless intrusion of our state. Please deny the request for a site certificate.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carl S. Rhoden', written in black ink.

Carl S. Rhoden

TARDAEWETHER Kellen * ODOE

From: Joel Rice <joelrice@me.com>
Sent: Monday, June 17, 2019 11:24 AM
To: B2H DPOComments * ODOE
Subject: B2H Comments

JOEL RICE, MD
BLUE MOUNTAIN ASSOCIATES, LLC/GRANDE RONDE RECOVERY, LLC
Board Certified in GENERAL, GERIATRIC AND ADDICTION PSYCHIATRY
1101 I AVE
LA GRANDE, OR 97850
joelrice@me.com
PHONE: 541.962.0162 FAX: 541.962.0119

DATE: 6/17/19 PAGES: 3

RE: Destruction of Glass Hill Habitat by Idaho Power

TO: Darrel T. Anderson
Idaho Power CEO
Jeff Maffuccio
Facility Siting Coordinator
PO Box 70
Boise, Idaho 83707

CC: JMaffuccio@idahopower.com (and by signed letter)
Union County Commissioners commissioners@union-county.org
La Grande City Government - mayor@cityoflagrande.org
rstroke@cityoflagrande.org

I cannot begin to tell you how heartbroken I am that Idaho Power has decided, in a game of political chess with no attention to ecosystem habitat whatsoever, to divide the most pristine and most protected montane meadow and mixed conifer habitat in all of Union County with a habitat destroying high voltage transmission line, destroying much of my life work and leaving me demoralized or worse for the rest of my days. The proposed division of my property by a high voltage line has left me hopeless and in a state of shock.

At the tender age of 15 I decided that one of my life goals was to protect a minimum of 2000 acres from development and even natural resource extraction as part of my duty to God and the planet. It turns out that this is a hard thing to do when you start from scratch but I succeeded, with great economic loss and considerable risk and stress. I succeeded only to see Idaho Power rip this accomplishment out of my hands by dividing and conquering the only private land in Union County entirely protected from habitat erosion of any kind.

I have spent decades controlling weeds, thinning trees, seeding, planting trees and closing skidding trails on the only piece of property devoted solely to habitat development in perpetuity in Union County. The plan was to leave a permanent pristine habitat for the enjoyment and edification of the people of Union County. One montane meadow under threat of destruction from Idaho Power has the greatest established biological diversity of any montane meadow in Union County. I have spent over \$500,000 on thinning alone and countless hours and dollars on weed control. The land is coming back and on the verge of re-establishing an intact ecosystem for the first time in many years only to be raped by Idaho Power. The purity of nature despoiled by financial greed and politics.

I know every species of shrub, forb and grass on Glass Hill. I doubt the rapists ready to sully her have any awareness of the species diversity they are about to pillage. How can you destroy work of art when you don't even know the artist.

I have spent the last few years building a cabin by hand that looks over the ecological intact Winn Meadow. The massive construction project proposed by Idaho Power will destroy the ecology of the meadow and the view. Given my propensity to develop crushing migraine headaches under high voltage wires I doubt I will be able to return. My land is ruined for me. My life's work is ruined. More importantly it is permanently ruined for the people of Union County. There is already public access for hunting, mountain biking, hiking, skiing, snowshoeing, mushrooming etc. None of this will be possible in the future once Idaho Power rapes the land. And who would want to visit a rape victim with the expectation of enjoyment or peace. I certainly will not.

It was my hope to put a small cabin residence along Glass Hill Road for residents of Union County suffering from drug and/or alcohol addiction to establish the beginning of recovery in a peaceful setting connected with God and nature. My retirement plan was to manage this Union County resource for the victims of the Opiate Epidemic sweeping our country. This resource will also be despoiled by the high voltage wire and constant snapping of the electromagnetic field overhead. This was another life goal ripped from my hands by the greed of Idaho Power.

Hundreds of Union County residents utilize my property for hunting (enrolled in an ODFW program for public hunting access), hiking, horseback riding, mountain biking, mushrooming, classroom trips, picnics, Native American festivals etc. My hope, under threat of desecration by Idaho Power, was to preserve this public use in perpetuity.

I host a Native American "Sundance" festival due to my appreciation of what this festival means to many in recovery from drug and alcohol addiction. This wonderful event will also be raped and left for dead by Idaho Power greed.

My only recourse is to carefully document the damage inflicted by B2H in the form of a guided hiking trails with kiosks, a documentary movie, a website and possibly a museum located underneath the high voltage line itself. I will teach what such raping of the land does to habitat and what the taking of private property does to social organization. We will keep detailed maps available online documenting the spread of weeds, erosion and soil compaction. I hope to fund a \$1,000,000 position at OHSU dedicated to the study of ecological, psychological and social costs of Right of Ways. That is all I can do.

It is hard to imagine that Idaho Power could in any fashion "make right" what they are doing to my peace of mind and my investments. I am prepared for a long legal and media fight in which Idaho Power explains why they decided to destroy the most protected and sensitive corridor of habitat in Union County. This will be my life's work now after retirement. My legacy for Union County will be one of a careful systematic documentation of habitat destruction instead of a careful, systematic restoration of said habitat. My nonprofit, memorial museum and B&Bs will insure that the rape of Glass Hill is not forgotten.

I am certain that Idaho Power is familiar with the work of Dr. Elinor Ostrom who has pioneered work on game theory and development of the commons for which she won the Nobel Prize. I am equally certain that Idaho Power is completely ignoring her scientific wisdom in deference to political expediency. This power line is likely unnecessary and if necessary could certainly have been positioned with less damage to Union County and without the taking and rape of my precious land.

Joel D. Rice, MD

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 ROSA-MONDA

Address 905 LAKE 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

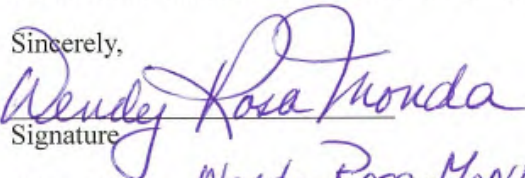
Idaho Power did not include any of the items listed in OAR 340-035-0035(l)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources 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: Wendy Rosa-MONDA

Mailing Address: 905 LAKE AVE
LA GRANDE, OR
97850



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Michael R. Rosenbaum

Mailing Address (mandatory) 1402 1st St. Apt A
La Grande, OR 97850

Phone Number (optional) (541) 9634828 Email Address (optional) cheefmeets@gmail.com

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.)

Page 38

1 massive construction trucks -- that is
2 Modelaire/Hawthorne Loop -- but to serve the hospital
3 when needed for the residents of 37 homes of men, women,
4 and children who walk -- I might add, there are no
5 sidewalks on that loop -- or drive daily, a neighborhood
6 which you could destroy, seemingly without giving it
7 another thought. Thank you.
8 I will be providing written testimony another
9 time.
10 HEARING OFFICER WEBSTER: Thank you.
11 MS. ADRIAN HENDERSON: Hello. I'm Adrian
12 Henderson. Thank you very much for letting me speak
13 today. I live at 219 Harrison in La Grande, Oregon.
14 Thank you for allowing me to testify.
15 You've already heard about the problems with
16 noise and invasive weeds. I am concerned with the lack
17 of requiring Idaho Power to make sure weeds do not go to
18 seed or make them clean their equipment before it leaves
19 the road or moves from one person's property to another.
20 As a member of the Chickasaw/Choctaw/Umatilla
21 tribe, I want to remind you of how important this is to
22 the tribes because of how it impacts our first foods.
23 Comments were provided by the tribes about this.
24 You also heard from the developer that they
25 would be working with the counties to make more changes

Page 39

1 to their weed plan. What I'm concerned about is that
2 the only thing Idaho Power is required to do are the
3 things that you include in the site certificates. The
4 site certificates need to state that Idaho Power must
5 comply with the state rules that require them to protect
6 the land from seeds being spread from their transmission
7 line, as long as the lines are in place. This is a
8 major problem, and why we need to be listening to the
9 people who are here today.
10 A statement by the developer that they plan to
11 fix something later means nothing if you do not include
12 it in the site certificate. The public will no longer
13 have the right to appeal what they are doing; in fact,
14 they don't even need to receive the information about
15 what the developer is actually including in their weed
16 plans.
17 This is why you will be receiving in writing
18 comments from me and others in this audience about what
19 needs to be changed.
20 I hope you will address the many problems you
21 are hearing about or denying Idaho Power permission to
22 build a transmission line that will cause huge damages,
23 increase our electric costs, but give us nominal
24 benefits.
25 Unlike Idaho Power customers, we are not

Page 40

1 having blackouts, equipment failures, or other problems
2 that this utility company are having. Maybe they would
3 have so many more problems if they would develop
4 energy -- so many less problems if they would develop
5 energy resources in Idaho instead of moving in hundreds
6 of miles of high-voltage transmission lines to get it to
7 their customers.
8 Thank you very much. Appreciate it.
9 HEARING OFFICER WEBSTER: Thank you.
10 Following Mr. Rosenbaum, we will hear from
11 Lois Barry.
12 MR. MICHAEL ROSENBAUM: A little bit of an
13 aside here, interestingly enough, I received an email
14 from my insurance company today: "Help protect your
15 home from wildfire. Find out how. Dear Michael,
16 Wildfires can occur suddenly with little to no warning.
17 We want to help you stay safe and prepared. Review the
18 resources below to learn how to protect yourself and
19 your property from wildfire."
20 I would like to thank the Council for this
21 opportunity to present testimony to the EFSC.
22 My name is Michael R. Rosenbaum. I reside at
23 1402 First Street in La Grande. I first moved to
24 La Grande in 1969, and I have lived here for a total of
25 27 years, having left and returned twice. I work

Page 41

1 seasonally for a federal agency and am currently a
2 member of the City of La Grande committee dedicated to
3 wildfire awareness, protection, and preparedness. The
4 views expressed here are my own, and do not represent
5 either my employer or the committee of which I'm a
6 member.
7 According to Wikipedia, there are a total of
8 946 incorporated and unincorporated cities in Oregon.
9 In the 2018 study "Exposure of human communities to
10 wildfire in the Pacific Northwest," researchers Joe H.
11 Scott and Julie Gilbertson-Day of Pyrologix and
12 Richard D. Stratton of the USDA Forest Service, ranked
13 La Grande number 40 of 50 communities with the highest
14 community exposure ranking with 5,426 housing units
15 exposed to wildfire and a burn probability rate of 138.
16 You will note that La Grande is edged by open
17 grasslands and timber on its southwest, west, and
18 northwest flanks, two of these three directions housing
19 the proposed Boardman to Hemingway transmission line.
20 The June 30, 2016, revision of the Union
21 County Wildfire Protection Plan, the CWPP, details in
22 the Union County Risk Assessment Summary of the
23 Northeast Oregon Multi-Jurisdictional Natural Hazard
24 Mitigation Plan, wildfire that either did encroach or
25 had the potential to put La Grande at risk. It details

Input on Draft Proposed Order for the Boardman to
Hemingway Transmission Line

<p style="text-align: right;">Page 42</p> <p>1 as well conditions that put the community's probability 2 of and vulnerability to a future hazard event rating as 3 high. 4 Note, this rating did not include any events 5 that might be caused by or influenced by a 500-kV power 6 line or a failure thereof in close proximity to 7 La Grande. This issue will be taken up later in the 8 testimony. 9 1973: The Rooster Peak Wildfire, 6,400 acres, 10 encroachment into the southwest city limits, structures 11 lost and the city threatened. 12 1986: The Frizzel Wildfire, 250 acres burned 13 in the Mt. Emily Wildfire-Urban interface, northwest of 14 La Grande. 15 2001: The Boulevard Wildfire, 150 acres in 16 the La Grande City watershed southwest of the city. 17 Fuel conditions in this location remain a substantial 18 hazard and this fire could have presented a "major 19 event" given less favorable conditions. 20 In a brochure issued by the La Grande 21 Wildland-Urban Interface Committee, there were 22 approximately 34 human-caused and approximately 52 23 lightning-caused wildfires in the last 10 years in close 24 proximity to La Grande, several of which were on or near 25 to the proposed route or routes of the Boardman to</p>	<p style="text-align: right;">Page 44</p> <p>1 Referring back to the Union County Risk 2 Assessment Summary, windstorms not attributable to 3 outflow from thunderstorms are not infrequent, but tend 4 to occur in the late fall and winter. Exceptions to 5 this are June 1998 with gusts to 50 miles an hour, 6 June 2001 with gusts to 60 miles per hour, July 22, 7 2004, with 70 miles-per-hour winds, and August of 2004 8 with gusts to 54 miles per hour. There may be other 9 incidents which occurred after these dates. 10 Again, please note that these wind events are 11 not generally attributable to outflow from nearby 12 thunderstorms, but it is general knowledge that 13 cumulonimbus-generated lightning with resultant wildfire 14 can create their own winds and patterns such as fire 15 whirls and long-distance transport of spotting, burning 16 material. 17 Thus, the power lines which are the subject of 18 this hearing could be affected by wildfire not generated 19 by line failure and from a remote ignition source. And 20 once involved, this grid could further amplify wildfire 21 severity and possibly drive the flame front into La 22 Grande. 23 Let us turn to the subject of wildfire 24 detection and the danger posed to the City of La Grande 25 by a proximate transmission line. There are three</p>
<p style="text-align: right;">Page 43</p> <p>1 Hemingway power line. 2 Let us look briefly at weather patterns in 3 La Grande. From the weatherspark.com website, the 4 predominant wind direction from mid-March to mid-October 5 is from the west. However, there are extended 6 exceptions to this. In 2017 and 2018, smoke from remote 7 wildfires in British Columbia, Montana, and Washington 8 were driven into the Grande Ronde Valley by north and 9 northeast winds. The limited visibility could have 10 hampered early wildfire detection. It did affect 11 livability and health issues. 12 Also note that the majority of thunderstorms 13 are driven into this area of the Blue Mountains by 14 southwest and west winds. 15 In a plot from the Department of Atmospheric 16 Sciences at the University of Utah, the strongest area 17 winds from 16 to 20 miles per hour and from 20 miles per 18 hour to infinity are from the south. The winds were 19 plotted from January 2017 to June 2019. The seasons of 20 the highest winds were not noted. Additionally, these 21 stronger winds did occur, to a lesser extent, from the 22 west and northwest. The Western Regional Climate Center 23 notes that from 1992 to 2002 the predominant wind 24 direction from April to September was northwest with 25 southerly winds October to the end of the year.</p>	<p style="text-align: right;">Page 45</p> <p>1 lookout towers which could early detect a wildfire start 2 either generated by a power line failure, line drop, or 3 a wildfire encroaching on the transmission line route. 4 They are Johnson Rock on the Wallowa-Whitman National 5 Forest southwest of La Grande, Mt. Ireland on the 6 Wallowa-Whitman northwest of Baker City, and Table Rock 7 on the Umatilla National Forest north of La Grande in 8 Washington. 9 Other means of detection include aircraft 10 flyovers, public reporting, strike indicators, and 11 satellites. 12 The Camp Fire of 2018 which forced evacuation, 13 and eventually engulfed, the City of Paradise, 14 California, and forced evacuation of Magalia, 15 Centerville, Pulga, and three other cities and 16 threatened seven other communities was not early 17 detected. The failure of PG&E transmission lines was 18 caused in part by wind speeds of up to 72 miles per 19 hour. A local lookout, which may have been able to 20 early detect the fire start, had been decommissioned. 21 Realistically, Johnson Rock lookout above 22 Vey's Meadow and the Grande Ronde River would have the 23 greatest chance to report a wildfire start. But would 24 there be enough time given possible extreme fire 25 behavior, possible transmission line failure causing a</p>

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>

I would like to thank the Council for this opportunity to present testimony to the EFSC.

My name is Michael R. Rosenbaum. I reside at 1402 1st Street, La Grande. I first moved to La Grande in 1969 and have lived here a total of 27 years having left and returned twice. I work seasonally for a federal agency and am currently a member of a City of La Grande committee dedicated to wildfire awareness, protection and preparedness. The views expressed here are my own and do not represent either my employer or the committee of which I'm a member.

According to Wikipedia there are a total of 946 incorporated and unincorporated cities in Oregon. In the 2018 study "Exposure of human communities to wildfire in the Pacific Northwest" researchers Joe H. Scott and Julie Gilbertson-Day of Pyrologix and Richard D. Stratton of the USDA Forest Service ranked La Grande number 40 of 50 communities with the highest community exposure ranking with 5,426 housing units exposed to wildfire and a burn probability rank of 138. You will note that La Grande is edged by open grasslands and timber on its Southwest, West and Northwest flanks, two of these three directions housing the proposed Boardman to Hemingway Transmission Line.

The June 30, 2016 revision of the Union County Wildfire Protection Plan (CWPP) details in the Union County Risk Assessment Summary of the Northeast Oregon Multi-Jurisdictional Natural Hazard Mitigation Plan wildfire that either did encroach or had the potential to put La Grande at risk. It details as well conditions that put the community's probability of and vulnerability to a future hazard event rating as high. Note: this rating did not include any events that might be caused by

or influenced by a 500 kv powerline or failure thereof in close proximity to La Grande. This issue will be taken up later in this testimony.

1973: The Rooster Peak Wildfire. 6400 acres. Encroachment into the Southwest city limits. Structures lost and the city threatened.

Rosenbaum

1986:The Frizzel Wildfire.250 acres burned in the Mt. Emily Wildfire-Urban Interface.Northwest of La Grande.

2001:The Boulevard Wildfire.150 acres in the La Grande City Watershed Southwest of the city.Fuel conditions in this location remain a substantial hazard and this fire could have presented a "major event" given less favorable conditions.

In a brochure issued by the La Grande Wildland-Urban Interface Committee there were approximately 34 human caused and approximately 52 lightning caused wildfires in the last ten years in close proximity to La Grande, several of which were on or near to the proposed route(s) of the Boardman to Hemingway powerline.

Let us look briefly at weather patterns in La Grande.From the weatherspark.com website the predominant wind direction from mid-March to mid-October is from the West.However there are extended exceptions to this.In 2017 and 2018 smoke from remote wildfires in British Columbia, Montana and Washington were driven into the Grande Ronde Valley by North and Northeast winds.The limited visibility could have hampered early wildfire detection.It did affect livability and health issues.Also note that the majority of thunderstorms are driven into this area of the Blue Mountains by Southwest and West winds.

In a plot from the Department of Atmospheric Sciences,The University of Utah,the strongest area winds from 16-20 miles per hour and from 20 miles per hour to infinity are from the South.The winds were plotted from January,2017 to June,2019 The seasons of the highest winds were not noted.Additionally these stronger winds did occur,to a lesser extent from the West/Northwest.The Western Regional Climate Center notes that from 1992 to 2002 the predominant wind direction from April to September was NW with southerly winds from October to the end of the year.

Referring back to the Union County Risk Assessment Summary windstorms not attributable to outflow from thunderstorms are not infrequent but tend to occur in late fall and winter. Exceptions to this are June, 1998 with gusts to 50 mph, June, 2001 with gusts to 60 mph, July 22, 2004 with 70 mph winds, August, 2004 with gusts to 54 mph. There may be other incidents which occurred after these dates. Again note that these wind events are not generally attributable to outflow from nearby thunderstorms but it is general knowledge that cumulo-nimbus generated lightning with resultant wildfire can create their own winds and patterns such as fire whirls and long-distance transport of spotting burning material. Thus the powerlines which are the subject of this hearing could be affected by wildfire not generated by line failure and from a remote ignition source. And once involved this grid could further amplify wildfire severity and possibly drive the flame front into La Grande.

Let us turn to the subject of wildfire detection and the danger posed to the City of La Grande by a proximate transmission line. There are three lookout towers which could early detect a wildfire start either generated by a powerline failure, line drop or a wildfire encroaching on the transmission line route. They are Johnson Rock on The Wallowa Whitman National Forest SW of La Grande, Mt. Ireland on the Wallowa Whitman NW of Baker City and Table Rock on the Umatilla National Forest north of La Grande in Washington. Other means of detection include aircraft flyovers, public reporting, strike indicators and satellites.

The Camp Fire of 2018 which forced the evacuation (and eventually engulfed) the City of Paradise, CA and forced evacuation of Magalia, Centerville, Pulga and 3 other cities and threatened 7 other communities was not early detected. The failure of PG&E transmission lines was caused in part by wind speeds of up to 72 miles per hour. A local lookout which may have been able to early detect the fire start had been decommissioned. Realistically Johnson Rock L.O. above Vey's Meadow and the Grande Ronde River would have the greatest chance to

report a wildfire start but would there be enough time given possible extreme fire behavior, possible transmission line failure causing a fire start, possible limited visibility preventing early detection, possible spotting from a remote ignition and other variables bringing wildfire to the transmission line route, to suppress the incident in time to stop encroachment into the city limits and to save structures in the Wildland-Urban Interfaces that are also in proximity to the transmission line route?

These factors must be taken into account before approval and construction of The Boardman to Hemingway system.

→ In Oregon on June 14, 2019 according to *The Statesman Journal* Pacific Power with approximately 600,00 end-user customers proposed to shut down electricity during extreme weather events which will help limit the effects of the grid on wildfire. It is likely that other Oregon power companies with local end-users will follow suit (in my estimation).

In CA PG&E has recently proactively cut power in extreme weather conditions in several Northern California counties: Napa, Solano, Yolo and several others including Butte County where Paradise is located.

Note that the Soda Fire in 2015 in Southwest Idaho and Oregon was not caused by a failure in Idaho Power's System but did require the company to replace 2.5 miles of transmission line.

What is the guarantee to the people of La Grande, OR that Idaho Power with no local end-user customers will shut power generation in the event of Red Flag warnings locally for extreme conditions including low rh's in the range of single digits to the low 20 percents, Lightning Activity Levels (LAL's) of 4 and higher, extended high temperatures, severe thunderstorms with attendant high outflow winds?

I have not gone into the issue of the changing climate in the Blue Mountains and also the frequent changes in weather patterns from year to year during fire season. A recent USFS

estimate could see temperature increases in the Blue Mountains over the next 30 years in the range of 4.5 to 6.5 degrees. There may be other unforeseen changes which could affect the viability of the transmission line.

I propose that the Boardman to Hemingway transmission line with the suggested routes in close proximity to the City of La Grande and structures in the Wildland-Urban Interface would contribute to the vulnerability and the high probability of wildfire intrusion and exposure. It would put values at risk with a failed line on the ground or involvement of the transmission lines and support structures in a wildfire. Values such as firefighting personnel and equipment, homes, structures including medical facilities, businesses, infrastructure, private timberlands and pasture. If the system is not a causative factor in a wildfire start it could be a contributive factor in the rapid acceleration of unchecked wildfire spread.

Should you approve this transmission line route through the Blue Mountains and specifically in proximity to La Grande you are quite literally playing with fire.

Doug Ross
407 main
LaGrande
OR 97850

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



RECEIVED

AUG 19 2019

DEPARTMENT OF ENERGY

Energy Facilities Siting Council
c/o Kellen Tardavetter, Senior Siting Analyst
Oregon Dept of Energy
550 Capital St NE
Salem

9700R-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,

Douglas Bradford Ross

Name: Doug Ross

Address: 407 Main Ave
La Grande, OR. 97850

As a long term LaGrande resident I do not understand why we have to bear all the risks for this project when there is no benefit to the residents of Union County!

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 6-20-19 Location: LaGrande
REGISTRATION FOR PUBLIC COMMENT

Name: Douglas Ross
Address: 407 Main Ave, LaGrande OR 97850
I represent (if applicable) Ross Construction
Print your name OR your organization/business name.

Send me future notifications about Council meetings via email.
My email address is: _____

I wish to address the Energy Facility Siting Council and/or

I wish to submit the following written comment:

I see no need for this Power Line,
it will be outmoded before it is built.
There are other alternatives to spending
all this money on such a large infrastructure.
Money would be better spent on alternative
energy promotion in Idaho Power service
areas. As a taxpayer I see this as a waste
of public money that government does not have!

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:49 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H!!

August 17, 2019

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, Oregon 97301

email: B2H.DPOComments@Oregon.gov

APPLICANT FAILED TO INCLUDE A SERIOUS ANALYSIS OF NON EFU ROUTES REQUIRED BY ORS 215.

Exhibit K, 4.1.1.4 Non-EFU Alternatives.

The applicant states that “The proposed EFU avoidance route provides substantially the most direct route between the Project endpoints while avoiding EFU lands where possible. They also claim that the evaluation they did meet the standard of being reasonable by virtue of being fair, proper, just, moderate and suitable under the circumstances. If their statements were actually accurate, the preferred route and alternate route proposed in the application for a site certificate would meet the requirements of ORS 215.275 AND OAR 345-022-0030.

Unfortunately, the application does not support Idaho Power's stated results for the following reasons:

- The applicant failed to do a robust evaluation of the alternative routes and provided practically no analysis of the “No Action” alternative.
- The applicant failed to identify all land meeting the definition of “farm” land.
- The proposed route does not meet a test of being a “reasonable” route as defined by *Friends of Parrett Mountain v Northwest Natural Gas Co.* 336 Or. 93, 108 (2003) due to the fact that it lacks “fairness”, is not “just, moderate, or suitable under the circumstances”. The proposed route fails to utilize available public lands and instead places the burden of impacts of the transmission line on unwilling private landowners.

Morrow and Malheur Counties are the only ones where the transmission line use of public land as opposed to private land is roughly equivalent to the percentages of each type in the county.

Baker County contains fifty one percent public land and 49% private land. The Boardman to Hemingway transmission line would be built using 83% private land and only 17% public land.

Union County contains 50% public and 50% private land. Idaho Power plans to build the transmission line on 19% public and 81% private land in this county.

Umatilla County contains 75% private land, however, the B2H transmission line would be built on 100% private land.

Due to the above, the applicant fails to comply with OAR 345-021-0010 and cannot be found to comply with OAR 345-022-0030 requiring a serious effort to identify a route which minimizes or avoids the impacts on EFU lands.

Tamson Cosgrove Ross

1904 Oak st, La Grande, OR, 97850

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:51 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H!!

12 August 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Dear Chair Beyeler and Members of the Council:

As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with a train track near by. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..." Solitude, of course, suggests an absence of distraction from external stimuli including noise. Campers often comment on the tranquility of the park where a 5 mph speed limit is enforced to limit noise, and no shooting or motorized craft are allowed on the lake. Even when the campground is full, it's possible to picnic or hike beside the lake in absolute silence.

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.

____ Tamson _____ Tamson Cosgrove Ross- 1904 Oak st, La Grande, OR, 97850
19fdf
sdfd

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:45 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Shut down B2H!!!

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

REGARDING; CONCERNS DUE TO THE INCREASED RISK AND LACK OF RESPONSE CAPABILITIES IN THE EVENT OF A FIRE ALONG THE TRANSMISSION LINE

The increased potential for wildfire has been established as a given along any transmission line. Not only is there an undetermined and potentially significant amount of time that will elapse prior to the identification of the fire, but then there may be a response time of up to 40 minutes after a fire is located in some areas according to fire fighting resources. There will be ample opportunity for the fire to grow significantly. Given the potential lack of speed in getting to the location, the difficulty traversing the terrain, and the lack of specialized equipment available to fight forest fires, local resources are not adequate to protect the public from wildfires occurring due to the construction and ongoing operation and maintenance of this transmission line.

Responding to fires that do occur will limit local resources available to provide service to their local areas of responsibility and the developer is planning to rely upon those local resources to deal with fires along the transmission corridor. Concern over the increased risk of fire as a result of this transmission line including multiple comments voiced by the citizens of the counties as well as special advisory groups prompted both Union and Baker counties to request funding for an analysis and recommendation to identify and mitigate the increased risk created by the construction and operation of the transmission line. Funding for that activity is not being supported by the developer.

This development will have a significant impact on the local service providers to provide protection and respond to fires. There would be construction occurring during the hot, dry summer, that they will be establishing Right of Ways with abundant low lying, heavy brush and grass which burns fast and hot. There are long distances along the entire length of the transmission line with no designated fire response unit, the employees building and maintaining the transmission line are not going to be qualified to fight fires they create, there is a lack of specialized equipment needed to fight transmission line caused fires, response times will be excessive, there is a lack of paid personnel available to deal with these remote fires, some fire stations have old equipment, and they will be creating hundreds of miles of new and improved roads to allow and increase access for human caused fires.

According to the Forest Service, between 88% and 90% of wildfires are human caused. There will be a significant increase in access for both people and vehicles along the entire right of way for the life of the transmission line. For example, Union County identified the following needs if the developer is going to rely upon local fire protection resources:

- Each volunteer firefighter needs to be provided with a phone and GPS system utilizing current technology able to provide service in remote areas along the transmission line
- There is a need for two heavy duty all terrain water trucks and any additional equipment needs identified by the Fire Chief.
- An additional full time position with the County fire department during any construction occurring in Union County.
- A permanent 1/2 time position to provide monitoring, training and firefighting during the life of the development.
- The county needs to participate in the development of a fire plan prior to it being accepted
- There is a need to provide resources to assure a response time of 14 minutes or less 90% of the time as required by NFPA.

A matter that adds significantly to the risk is the fact that the developer is stating they will rely upon Rural Fire Protection Services to respond and fight fires along the transmission line. These fire departments are only authorized to fight structural fires.

I hope you take these comments seriously, as the risk of catastrophic fires in the areas being impacted by the Boardman to Hemingway Transmission line are high. No acceptance of Condition Number 6 should be given until the developer has shown that they are dealing with the increased fire potential they are creating through this development.

Sincerely,

Tamson Cosgrove Ross

1904 Oak st, La Grande, OR, 97850

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:41 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] SAY NO TO B2H!!!!

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

B2H EFSC LACK OF DOCUMENTATION FOR GREAT GRAY OWL AND FLAMMULATED OWL

The surveys provided for these two species are too old to be a reliable indicator of the presence or impacts to these bird species. They were done in 2011 and 2012, seven years ago. On Page P1-9, Table P1-l the applicant proposes doing updated surveys only on areas not previously surveyed and submitting them to only ODOE. This type of secretive procedure where the public is completely removed from any opportunity to comment or review the decisions being made by ODOE is the basis for a great deal of public dissatisfaction with the process currently being supported by ODOE and EFSC.

There is no current information in the application to base any decision regarding what the impacts will be to these birds as a result of the Boardman to Hemingway Transmission Line. A site certificate cannot be issued determining compliance with OAR 345-022-0060 without knowing what the use of the area is by wildlife. In addition, since habitat category must include the use of the habitat by species, the habitat categories cannot be determined until the developer provides the necessary current information. Given that the area of the Ladd Marsh Wildlife area is not only protected, but also contains both federal and state mitigation areas, it is not possible to determine whether or not the development will have unacceptable impacts to these mitigation sites absent information regarding the use of the adjacent habitat by wildlife utilizing the mitigation sites and whether or not the habitat will be compromised making it unsuitable for use of the species due to impacts of the development. Considering the lack of information near Ladd Marsh Wildlife area, one must question why.

Ladd Marsh is an important Migratory Bird Flyway according to the Oregon Department of Fish and Wildlife (ODFW 2008.) The Audubon Society lists it as an Important Bird Area. The number of bird species using this area has expanded in the last several years, however, in 2008 over 230 species of birds had been recorded on LMWA and over 120 species nest in the area and yet the developer appears to be ignoring the importance of not only the wildlife area, but also the habitat surrounding the wildlife area which is critical to the survival of birds moving in and out of the mitigation sites.

Signature,

Tamson Cosgrove Ross

1904 oak st, La Grande, OR, 97850

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:35 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop the POWER!! (B2H)

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 (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,

Tamson Cosgrove

1904 Oak st, La Grande, OR, 97850

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:28 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H

August 22, 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 FINANCIAL IMPACTS TO THE STATE AND LOCAL ECONOMY AS A RESULT OF THE LOSS OF FOREST LANDS “PERMANENTLY”

Exhibit K, Attachment K-2, Page 23, Section 7.0

Idaho Power values Oregon’s forest lands at an absurdly low amount according to individuals owning forest land in both counties.

The applicant claims that removal of forestland by clearing of trees permanently will have little economic impact to Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. They value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the figures they claim apply or the basis for the difference in value per acre between Umatilla and Union Counties for forest economic value.

The applicant failed to address OAR 660-006-0025(5)(a) which does not apply only to forest zoned land currently in production. It addresses FOREST ZONED LAND. The developer is removing the income and opportunity for the landowners and counties to obtain the benefits available through timber production. For example, a large amount of land was burned and is recovering but will become productive timber land. The applicant also limited their assessment of impacts to accepted forest practices to the current use of the land. The requirement under OAR660-006-0025(5)(a) is to assess whether or not the development will cause a significant change or significantly increase the costs of accepted forest practices on forest lands. This developer is stating that they are going to cause a permanent change to the land in their proposed right of way. Accepted forest practices are based upon the impacts in the future when the land is being utilized for growing trees or other uses consistent with the forest zoned lands. Forest uses are defined in Union County Land Use Plan as The (1)production of trees and the processing of forest products (2) open space, buffers from noise, and visual separation of conflicting uses; (3) watershed protection and wildlife and fisheries habitat; (4) soil protection from wind and water, (5) maintenance of clean air and water (6) outdoor recreational activities and related support services and wilderness values compatible with these uses, and (7) grazing land for livestock

The developer assumes incorrectly that the forest zoned lands not currently in production of trees will ever be used for that purpose.

The assessment of the impacts to accepted forest practices is seriously understated due to the understatement of forest lands, the lack of including the impacts to forest practices and the economic impacts of removing the land from forest uses.

1. The applicant ignored the definition of “forest lands” in determining the amount being impacted by the development. Forest Lands include, “lands composed of existing and potential forest lands which are suitable for commercial forest uses; (2) other forested lands needed for watershed protection, wildlife and fisheries habitat and recreation; (3)lands where extreme conditions of climate, soil and topography require the maintenance of vegetative cover irrespective of use; (4)other forested lands in urban and agricultural areas which provide urban buffers, wind breaks, wildlife, and fisheries habitat, livestock habitat, scenic corridors and recreation use; (5)means any woodland, brushland, timberland, grazing land or clearing that, during any time of the year, contains enough forest growth, slashing or vegetation to constitute, in the judgment of the state forester, a fire hazard, regardless of how the land is zoned or taxed. As a result of only counting forest lands currently in production, the forest impacts are significantly understated.
2. There is no explanation regarding how they came to the numbers they are using for forest sector jobs or explain the difference between the two counties.

Costs to the landowner of forest zoned land currently in production of timber:

1. There is a significant change when the landowner can no longer use his land for growing timber, but continues to have the expense of paying taxes on land that is not productive. The loss comes directly from the landowners profit from the harvest.
2. Landowners will receive less income with the same expenses.
3. For landowners who receive income from hunters, the land will become less desirable due to the visual impact of the line and the fact that elk will avoid the area for multiple reasons including human and vehicle traffic, corona visual impacts, etc.
4. Landowners use their land as collateral for borrowing funding to run their operations. The reduction in value will make it more difficult for owners to obtain necessary funding in order to stay in business.
5. Accessing timber on either side of the transmission line requires moving vehicles and equipment around the transmission line due to an inability to move log trucks and large equipment under the line.
6. Limits the direction for falling timber and can result in more dangerous tree falling with increased damage to the remaining timber as well as the one being harvested.
7. A transmission line results in the loss of timber along the line due to blow downs.
8. There is an increase in the potential for fire both from the line, but even more significantly, from human traffic along the transmission line.
9. Increased liability and insurance needed due to increased risk of injury to trespassers.
10. There is a loss of wildlife habitat without being mitigated due to a failure to require the developer to provide mitigation for the destruction of forest habitat along the right of way. Requiring mitigation for only the bases of the structures means only a minute amount of the loss will be compensated for. Only allowing the removal of nest sites when birds are not present does not address the fact that many birds such as bald and golden eagles use the same nesting sites year after year and forest landowners usually include wildlife habitat as a reason for maintaining the forest land.
11. Idaho Power states that the value of the forest land removed permanently from production would be further reduced due to the ability of the forest owners to use the transmission line corridor for growing crops or grazing. This statement is unequivocally false. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive. It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to “Estimated Livestock Fencing Costs for the Small-Farm

Owner” by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.) of field fence is \$1,108.53 plus the cost of building it. The Iowa State University Extension identified 2011 costs for constructing ¼ mile of fencing to be \$1,947.75 installed. Enclosing a square acre requires 820 feet of fence.

Costs to forest zoned land currently being used for farm practices:

1. Increased invasive weeds.
2. Increased costs to apply herbicides, pesticides and fertilizer due to restricting the use of aircraft for application.
3. Increased safety hazard due to transmission line interference with emergency calling.
4. Increased cost of activities normally occurring through radio controlled equipment due to need to hire a person to perform the function.
5. Interference with irrigation equipment.
6. Loss of land use around the transmission structures due to turning radius of equipment and restrictions regarding height of equipment that can go under the transmission lines.
7. Soil compaction from equipment causes reduced crop yield for years according to landowners with existing transmission lines crossing their land.
8. Road damage due to ongoing use by developer and contractors performing maintenance on the transmission line.

Costs to the local economy:

1. The developer failed to include the harvest income that is received by the landowner and then spent primarily in the local area.
2. There is no consideration for the increased value of money which is circulated in the local community.
3. There is no accounting for the state and local taxes paid as well as harvest taxes which are paid and support the state and local area.
4. Replacing trees with a transmission line will negatively impact tourism dollars as it will reduce the numbers of wildlife viewers and hunters due to a reduction in elk, deer, birds, and other wildlife that draw them to the area. The Oregon Department of Fish and Wildlife and Travel Oregon reported that 2008 recreation expenditures in Oregon totaled \$2.5 billion as reported by Dean Runyan Associates. As the following comment notes, energy projects are cutting into that revenue.
5. Attached article “Are energy projects causing loss of tourism dollars on public lands?” cites the data from the Bureau of Land Management which recorded a 12% drop in the number of visitors to the Imperial Sand Dunes Recreation Area over the year after a high voltage power line was constructed. Data is available in the BLM’s Centro Field Office under Highlights of the Desert District Advisory Council Meeting dated February 9, 2013.
6. The increased costs to harvest timber after a transmission line has been built is recognized by the courts who mandate that payment be made to landowners for this loss if their property is condemned to build the transmission line. The compensation must include at a minimum the value of the existing timber, the value of the timber that could be produced on the land in the future, and the increased costs of harvesting the timber adjoining the transmission line.
7. The developer plans to use local resources to fight fires caused by the transmission line or access created by the transmission line to human caused fires. There is no required mitigation for the increased risk of fire. The applicant’s statements that they “may” restrict hours of operation, they “may” require water trailers, “may” require fire watches, “may” restrict road use during thaws means there is no mitigation being required to reduce the increased fire risk or the road damages that will occur.

Some facts related to the value of forest land:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained. With the reduced harvest of timber on public land, the importance of private forest lands has increased significantly in sustaining the industry.

Removing trees from land currently being used to grow them certainly will create a substantial change in accepted forest practices. It also will substantially increase the costs of growing and harvesting trees on the surrounding lands. The transmission line will make it impossible to use aerial equipment to harvest trees on steep hillsides adjacent to the line, it will increase time and costs of harvest due to the need to avoid equipment contact with the transmission lines, avoid trees falling on the transmission lines, require the use of routes of access and egress from the forested lands that avoid having log trucks and equipment moving below the transmission lines, will decrease the harvest along the transmission line due to loss of trees along the forested land along the corridor due to wind and weather conditions impacting weakened root infrastructure once the transmission corridor is cleared.

In other words, this transmission line will remove forested land resulting in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming from that activity, but there will be related losses to the productivity of adjacent land, increased costs of harvesting along the transmission line, increased risk of wildfire, potential increase in the number of trespassers, interference with wildlife activities including displacement of wildlife using the forest lands to what may be less desirable habitat, opening the area up to increased predation on the multiple non-raptor species utilizing the forested areas, it will decrease the value of land if it is sold, cause a long-term reduction in assessed value of the land, etc.

The Conclusions stated by the applicant in section 8.0 are absolutely false.

In addition, the applicant has failed to provide documentation to support their comments. The only reference the applicant sites that relates at all to this issue is the publication from the Oregon Forest Resources Institute.

In summary:

The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030; and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Sincerely,

Tamson Cosgrove Ross

1904 oak st, La Grande, OR

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:21 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H

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!**

Tamson Cosgrove Ross

1904 oak st La Grande OR, 97850

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:31 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H

August 22, 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,

Tamson Cosgrove Ross

1904 Oak st, La Grande, OR. 97850

ESTERSON Sarah * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:24 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H!

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 wild life and bird sanctuary, home to nesting bald eagles. In their application, Idaho Power omits any references to Twin Lake.

Page 156, (T-4-6) purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe “extensive work on this siting study” ever occurred.

2) b. A specific example of unsupported conclusion:

Page 145 (T-4-46) Baseline condition: "... A goal of minimal development of Morgan Lake Park should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users..."

Page 146 (T-4-47) "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape."

Page 49 (T-44) "Vegetation will block views of the towers from most locations in the park." In reality, one tower would dominate the entrance to the park, all 130' in plain view. Within the Park, the trees bordering the lake are no more than 80' high. 130' transmission towers will rise more than 50' above those trees, dominating the current landscape.

Idaho Power does not provide a graphic representation of Morgan Lake Park, with the accurate height of existing trees, and elevation of towers above the trees. It simply concludes that the inescapable sight of 500 kV transmission lines and towers around a natural lake setting will have "no significant impact" on Morgan Lake Park.

This is the park whose baseline "should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users" [because 50 years ago, no one ever imagined anything larger than a human being, might ever intrude]..."

I urge the Commission to deny this application for a site certificate until each comment submitted and sent to the Commission by August 22 has been thoroughly analyzed, and Idaho Power has provided credible evidence to support each of its conclusions of "no significant impact."

Tamson Ross

1904 oak st, La Grande, OR, 97850

TARDAEWETHER Kellen * ODOE

From: Tamson Ross <rosstc@eou.edu>
Sent: Thursday, August 22, 2019 4:21 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] Stop B2H

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!**

Tamson Cosgrove Ross

1904 oak st La Grande OR, 97850

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for 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.

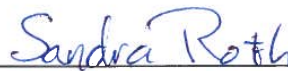
In summary:

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: 69465 Lantz Ln.

Cove, Or. 97824

r. 10 rule supposed to plant trees not cut them down

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.

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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: Sandra Roth

Address: ~~La Grande, OR 97850~~

Cavo, OR 97824

TARDAEWETHER Kellen * ODOE

From: Ron Rowan <rowan@thegeo.net>
Sent: Saturday, July 20, 2019 12:01 PM
To: B2H DPOComments * ODOE
Subject: [Fortimail Spam Detected] B2H Comments on Siting of Power Line in Baker Country
Attachments: B2H Powerline letter 7-20-19.docx

Mr. Tardaewether:

Please find attached our letter opposing the B2H transmission line through Baker County.

Thank you for your consideration.

Ron and Ann Rowan

DATE: July 20, 2019

TO: Kellen Tardaewether, Senior Siting Analyst
Oregon Dept of Energy
550 Capitol St N.E.
Salem, OR 97301

FROM: Ron and Ann Rowan
42676 Nye Rd.
Baker City, OR 97814
541-523-0630 Home Phone
rowan@thegeo.net

SUBJECT: Proposed B2H Transmission Line through Baker County, OR

We live in Segment 3 of the proposed B2H transmission line route. Our house is located within ½ mile of the Flagstaff Alternative route and west of the Oregon Trail Interpretive Center in the Baker Valley.

Our principle concern is locating the transmission line west of the Oregon Trail Interpretive Center (OTIC) using the Flagstaff Alternative route. This route will have a major visual impact to those looking west from the OTIC into the Baker Valley. The trail system below the OTIC gives the experience of “walking the Oregon Trail”. With the presence of looming towers, the historical experience will be greatly compromised. With the transmission line going along the edge of Baker Valley, the line will interfere with agricultural practices and detract from the value of the affected property. We are strongly opposed to placing the transmission line west of the OTIC. The proposed action of building the transmission along the Flagstaff Alternative Route will have serious consequences. The presence of large transmission towers will introduce permanent impacts on visual resources, National Historic Trails and the value of private agricultural land.

We attended the EFSC public hearing in Baker City on June 19th and agree with the unanimous testimony opposing the transmission line through Baker County.



Oregon Department of Energy and the Energy Facility Siting Council

Public Hearing on the Draft Proposed Order
for the Boardman to Hemingway Transmission Line
June 18-20 and June 26-27, 2019, 4:30-8 p.m.
Public Written or Oral Testimony Registration

Name (mandatory) Sandy Reyna

Mailing Address (mandatory) 6054 RR Ave
LaGrande OR 97850

Phone Number (optional) 541 379-3405 Email Address (optional) sdyreyna@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 26

1 name, if you would spell it for the record as well, so
2 the court reporter can get it down correctly.
3 The first person in this we are going to call
4 up is Sandy Ryman, and then we are going to follow
5 Ms. Ryman with David, it looks like Moyal. When
6 Ms. Ryman finishes and the next person comes up, I will
7 then identify the person that follows so you'll know who
8 the next person is going to be.
9 Good evening.
10 MS. SANDY RYMAN: Good evening. My name is
11 Sandy Ryman, R-y-m-a-n, and my address is 604 M Avenue
12 here in La Grande, Oregon.
13 I am a lifelong resident of eastern Oregon,
14 and I have an undergraduate degree in community health
15 and an MBA. So you can tell this is not my area of
16 expertise. But what I currently do in my work is I look
17 at needs and needs assessments; so I decided to focus on
18 Exhibit N, the needs portion of the application for a
19 site certificate.
20 And in doing that, I'm still wading through
21 all the details, but I wanted to take a look at the
22 needs portion in particular. And it discusses the fact
23 that in September of 2009, Idaho Power's board of
24 directors approved guidelines to establish a goal to
25 reduce CO2 emission intensity of the company's utility

Page 27

1 operations.
2 One of the primary sources of electrical
3 energy for Idaho Power is currently hydroelectrical
4 generation, and they state in the application that
5 because of the changes in stream flows and production
6 levels of existing renewable resources, they have been
7 working on assuring diversity in their energy resources
8 and they list those. And they're also working on
9 assuring diversity because changes in extreme flows can
10 impact the CO2 emissions process for producing energy.
11 They listed eight different types of
12 supply-side resources. And my point No. 1 is that I
13 question whether those aren't -- aren't more of those
14 power resources available in southern Idaho? Because I
15 wonder if the cost of this transmission line is
16 considered in any of those CO2 emission calculations
17 overall. It seems questionable as compared to more
18 localized power sources within southern Idaho.
19 I also did some research in looking at the
20 April 2015, report from the US Department of Energy.
21 They do an energy review transmission, storage, and
22 distribution infrastructure on it, and they came up with
23 some facts that I found quite interesting.
24 So my point No. 2 is the fact that they point
25 out that there is low load growth, that the growth rate

Page 28

1 of total US energy electrical consumption has been on
2 the decline and has even been negative in the last few
3 years. In fact, the growth rate of the US electricity
4 load is the lowest levels since 1950.
5 So moving on from that, and point 3 that I
6 want to make, is they also discuss the fact that severe
7 weather and climate changes are currently causing
8 significant damage to grid infrastructure, and
9 particularly to transmission lines. And they go on to
10 talk about the fact that there are certain regions of
11 the country that are specifically impacted by weather
12 events. And in the West our weather events are caused
13 by lightning and wildfires.
14 And the report goes on, it also talks about
15 five factors that need to be considered; lightning,
16 wildfires, extreme cold, extreme winds, and vegetation
17 growth. And really, all of those are things which can
18 have an impact on this transmission line and could
19 create a long-term maintenance impact for Idaho Power.
20 I'm going to talk also about the fact that the
21 modeling effort which is sited in this Department of
22 Energy report states that the modeling effort really
23 focuses only on new transmission along existing or
24 proposed corridors, and it doesn't consider local and
25 regional reliability impacts of these kind of scenarios.

Page 29

1 And so it seems like whatever kind of modeling
2 opportunity Idaho Power had, that if they're using the
3 standard models, even the Federal Department of Energy
4 pointed out, those standard models don't really help
5 with understanding the reliability of the scenario which
6 they are presenting.
7 My point No. 4 is the electrical transmission
8 can take 4 or more years to be built out. And I feel
9 like, in addition to that, costs are going to be rising
10 and transmission costs are going to go up due to
11 maintenance, due to the weather situations. So that is
12 my point No. 4.
13 Point No. 5 is that up until now I've only
14 talked about the transmission line and the factors that
15 impact its veracity, but there is also a lot of new
16 technologies which are coming out. And I went back to a
17 report which I remembered reading a couple of years ago,
18 it was by Gregory Reed, who is a professor and director
19 of the Center for Energy and the Grid Institute at the
20 University of Pittsburgh School of Engineering, and he
21 did have an article in "The Hill" publication in
22 December of 2017.
23 He talked about: Our existing grid was
24 originally designed to move electricity in one
25 direction, from large, centralized resources to

Page 30

1 factories, commercial facilities, businesses and homes.
2 But the way that we use energy today is based more on
3 power electronics and direct current, which is the
4 format Thomas Edison preferred. Many of the new
5 resources in energy, such as solar and battery energy
6 storage, are inherently DC, which is resulting in a
7 mismatch between AC, which is the transmission line
8 we're talking about, and the DC-based resources and
9 loads.

10 And he talks about how this electricity
11 resources include not only cleaner natural gas plants,
12 but distributed solar and wind farms located mainly in
13 rural areas. This new paradigm was enabling options for
14 smaller regional microgrids as a method of building
15 greater resiliency, reliability, and security in our
16 power infrastructure. And these are defined by smaller
17 geographical boundaries. Microgrids essentially contain
18 enough energy resources to meet the demands.

19 And nowhere in the application does Idaho
20 Power talk about having looked at microgrids as an
21 option.

22 So I asked myself: Why is Idaho Power looking
23 at this long transmission line? Well, the US Department
24 of Energy report that I cited previously says that:
25 Currently power groups, like the American Electric

Page 31

1 Power, is not building new power plants; they are
2 retiring power plants, but they are expanding their
3 transmission network because it provides reliable
4 financial returns at a time when an industry's main
5 source of income, power generation, is flat.

6 And so I was very concerned that the whole
7 siting methodology may not have looked at this, and I
8 was wanting to make sure that you folks heard that.

9 HEARING OFFICER WEBSTER: Thank you very much.
10 Following Mr. Moyal, we will have Roger Barnes
11 on deck.

12 UNIDENTIFIED SPEAKER: Mr. Barnes is not here.
13 HEARING OFFICER WEBSTER: Well, then we are
14 going to skip Mr. Barnes and we will hear from JoAnne
15 Marlette after --

16 MR. MOYAL: David Moyal.
17 HEARING OFFICER WEBSTER: Yes, your turn, and
18 then Ms. Marlette.

19 MR. DAVID MOYAL: Thanks for allowing me to
20 speak to members of the Council --

21 HEARING OFFICER WEBSTER: A couple things. If
22 you would use the microphone, if you would state your
23 name and your address, and if you would read a little
24 bit slower so the court reporter can take it down.
25 MR. MOYAL: I will.

Page 32

1 My name is David Moyal, and my address is 1804
2 Second Street here in La Grande. I appreciate the
3 opportunity to speak to the members of the Council.

4 I object to the proposed routing of the B2H
5 transmission line through Union County. I'm a resident
6 of La Grande, and I'm very concerned because I live not
7 much more than a mile from the proposed route. In its
8 application for site certificate, Idaho Power states
9 that the project is, and I quote, "not likely to result
10 in significant adverse impacts to scenic resources and
11 values identified as significant or important in local
12 land use plans, tribal land management plans" --

13 HEARING OFFICER WEBSTER: Mr. Moyal, if you
14 would move the mic a little closer to you.

15 MR. MOYAL: Closer still? Is this okay?
16 HEARING OFFICER WEBSTER: Yes.

17 MR. MOYAL: -- "and federal land management
18 plans for any lands located within the analysis area
19 described for the project."

20 But this conclusion is far from the case. The
21 arguments for it can only be made by the narrowest
22 possible interpretation of specific clauses in the Union
23 County land use plan. The plan's general and
24 overarching purpose, and I quote Union County's general
25 plan, is: "The natural beauty of Union County is worthy

Page 33

1 of preservation and should be preserved consistent with
2 the stated purposes of this plan."

3 It goes on to say on page 33 that the
4 development will maintain or enhance the attractiveness
5 of the area and not degrade resources. The application
6 ignores the general purpose of the plan, basically
7 saying, and I paraphrase it, if an area isn't
8 specifically mentioned in the plan, in County's plan,
9 then it lies outside the purview of the application and
10 doesn't need evaluation.

11 The logic behind this dismissal of scenic
12 resources impact is flawed. The County, in defining
13 specific areas of concern, couldn't possibly in the
14 1970s have anticipated every possible project that might
15 deleteriously affect County viewshed, hence the general
16 mission statement of the plan, which I quoted earlier,
17 needs to be addressed in the application before
18 conclusions regarding scenic values can be reached.

19 I'll go off topic a little bit. I would like
20 to point out the injustice in the exclusion of the City
21 of La Grande from permitting and siting process. More
22 than any other municipality we are impacted by this
23 project, yet because it lies immediately outside our
24 city limits we are excluded beyond the City Council
25 proclamation opposing the project from the

Sandy Ryman

Hello, my name is Sandy Ryman and am a lifelong resident of eastern Oregon. I have an undergraduate degree in Community Health with minors in biology and chemistry, and an MBA. This is not my area of expertise but my work focuses on needs and I have focused my research into this proposal on Exhibit N – the Needs portion of the Idaho Power application for a site certificate.

My comments today are meant to question the foundations of the business model for this proposal for the Boardman to Hemingway transmission line.

Exhibit N of the Idaho Power Application for a Site Certificate describes the need for this project. I am still wading through those details.

The report states: “In September 2009, Idaho Power’s Board of Directors approved guidelines to establish a goal to reduce the CO2 emission intensity of the company’s utility operations.”

A primary electrical source for IP is currently hydroelectric generation. Because of changes in stream flows and production levels of existing renewal resources, they have also worked on assuring diversity in energy resources. These portfolios included eight different types of supply-side resources—solar, single-cycle combustion turbine, combined-cycle combustion turbine, geothermal, pumped storage, distributed generation, combined heat and power.

Additionally, IP notes work on assuring a diversity of energy sources with the power from the Longhorn Power Station, to be built by the Bonneville Power Administration, is from the Mid-Columbia market which includes parts of Canada as well as Washington and Oregon. Sources of power are, at a minimum, wind, dams and coal.

Point 1: I question whether there aren’t more of these power sources available in southern Idaho. Is the cost of this transmission line considered in CO2 emission calculations, because it seems questionable as compared to more localized power sources within southern Idaho?

In April 2015 the US Department of Energy produced a QUADRENNIAL ENERGY REVIEW: ENERGY TRANSMISSION, STORAGE, AND DISTRIBUTION INFRASTRUCTURE.

https://www.energy.gov/sites/prod/files/2015/09/f26/QER_AppendixC_Electricity.pdf

Interesting Facts:

Point 2: Low Load Growth The growth rate of total U.S. end-use electricity consumption has been on the decline—even going negative in recent years. In fact, the growth rate of U.S. electricity load (demand) is at the lowest levels since 1950 (see Figure C-3).

Point 3: Severe Weather and Climate Change Currently, severe weather events are the largest cause of damage to grid infrastructure and disturbances to electricity service. Weather is the leading cause of grid disturbances, particularly at the distribution level, but causes vary by region and include, in addition to weather, types of vegetation, as well as vegetation management and other maintenance practices.

While electricity services in all regions of the country are affected by weather-related outages, “year-in-review” reports published by DOE since 2010 illustrate that **certain regions typically are affected more by certain types of weather events.**

Though the Pacific Northwest, California, and Texas also are impacted. **The West sees many outages caused by lightning and wildfires.**

Additionally, overall extreme wind and temperatures can also make a difference, so in this area 5 factors need to be considered:

- lightning
- wildfires
- extreme cold
- extreme winds
- vegetation growth

These factors create a long term maintenance impact for Idaho Power.

U.S. temperatures are projected to continue rising in the coming decades.⁵² Electricity transmission systems carry less current and operate less efficiently when ambient air temperatures are higher.

In the context of expanding access to renewable energy, **many discussions coalesce** around the **relative strengths and weaknesses of building long-distance, high-voltage electrical transmission lines from the high-quality resources to demand centers, as compared to relying on existing or shorter new transmission to connect demand with nearby, potentially lower-quality renewable or other resources. As with the overall OER modeling effort, this effort used ReEDs, which only builds new transmission along existing or proposed corridors and does not consider local and regional reliability impacts of scenarios.**

Point 4: ELECTRICITY Transmission projects can take 4 or more years and maybe even up to a decade to reach operation and have high upfront capital cost. In all the variables comparing sources of energy available to IP, I don't know how the cost of the transmission line building and maintenance was factored in. I still need to research this further. Maybe it is factored in and maybe it isn't – wait till my 6th point for more on that.

Point 5: Up till now, I have focused on looking at the transmission line and factors effecting it's veracity but there are so many new technologies coming on board that can also impact costs.

I read an article from December, 2017, Gregory Reed *who is a professor and director of the [Center for Energy](#) and the [GRID Institute](#) at the University of Pittsburgh [Swanson School of Engineering](#).* published an online article for *The Hill*, stating:

<https://thehill.com/opinion/energy-environment/365890-a-vulnerable-power-grid-lets-invest-in-critical-national>

Our existing “grid was originally designed to move electricity in one direction, from large, centralized resources to factories, commercial facilities, businesses and homes. But the way we use electricity today is based more on power electronics and direct current, or DC, the format that Thomas Edison preferred. Many new resources, such as solar and battery energy storage systems, are inherently DC, resulting in a mismatch between AC delivery infrastructure and DC-based resources and loads.

He goes further in stating:

“electricity sources include not only cleaner natural gas plants but also distributed solar and wind farms, located mainly in rural areas. This new paradigm is enabling options for smaller regional “microgrids,” as a method of building greater resiliency, reliability, and security in our power infrastructure.

Defined primarily by smaller geographical boundaries, microgrids essentially contain enough energy resources to meet the demand. Microgrids provide energy independence and allow for more rapid restoration of outages as compared to conventional power delivery methods. Microgrids also present opportunities for novel solutions such as the application of DC architecture.

No where were microgrids stated as a resource to assist in creating greater efficiencies within IP’s current system. “At the consumer end, DC networks would better match resources to modern use, increasing efficiency and lowering operating costs.”

Also, according to the U.S. Energy Information Administration about 5 percent of energy generation in the US is lost as it travels from power plant to consumer,. use of local energy resources and DC microgrids can reduce those losses significantly.

The promise of DC microgrids <https://microgridknowledge.com/dc-microgrids/>

Point 6: I asked myself, “So why is Idaho Power looking at this long transmission line?”

According to the US Department of Energy report, I cited previously:

“While a number of cost-recovery schemes are available, the incentive to build transmission rests on the fact that, relative to many other investments, transmission assets can provide long-term and stable returns— something that cannot be ensured elsewhere in a dynamic economy and technological environment. For example, American Electric Power—one of the Nation’s largest electric utilities (and a large owner of both generation and transmission)—now has a strategy of not building new power plants, retiring power plants, and expanding its transmission network, which totals more than 39,000 circuit-miles that cross through 11 states, **to provide reliable financial returns at a time when the industry’s main sources of income (traditionally power generation) are flat.**114”

I am concerned that Oregon citing methods do not look at the needs in terms of cost to the end consumer and whether that cost is really necessary in light of new technologies like microgrids, new battery storage systems, and other internal system changes which can reduce energy requirements. Idaho Power appears to be using the same revenue strategy as American Electric Power – that is a significant concern to end users and those of us along this proposed route.

1112 1/2 Adams Ave
La Grande, OR 97850

Energy Facility Siting Counsel
Attn: V. Tardewat
Oregon Dept. of Energy
550 Capitol St., NE
Salem OR

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DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst
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Salem, Oregon 97301
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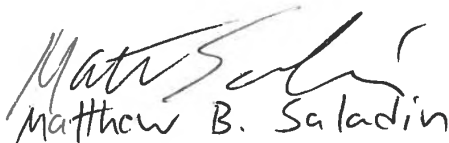
**B2H EFSC LACK OF DOCUMENTATION FOR GREAT GRAY OWL AND
FLAMMULATED OWL**

The surveys provided for these two species are too old to be a reliable indicator of the presence or impacts to these bird species. They were done in 2011 and 2012, seven years ago. On Page P1-9, Table P1-1 the applicant proposes doing updated surveys only on areas not previously surveyed and submitting them to only ODOE. This type of secretive procedure where the public is completely removed from any opportunity to comment or review the decisions being made by ODOE is the basis for a great deal of public dissatisfaction with the process currently being supported by ODOE and EFSC.

There is no current information in the application to base any decision regarding what the impacts will be to these birds as a result of the Boardman to Hemingway Transmission Line. A site certificate cannot be issued determining compliance with OAR 345-022-0060 without knowing what the use of the area is by wildlife. In addition, since habitat category must include the use of the habitat by species, the habitat categories cannot be determined until the developer provides the necessary current information. Given that the area of the Ladd Marsh Wildlife area is not only protected, but also contains both federal and state mitigation areas, it is not possible to determine whether or not the development will have unacceptable impacts to these mitigation sites absent information regarding the use of the adjacent habitat by wildlife utilizing the mitigation sites and whether or not the habitat will be compromised making it unsuitable for use of the species due to impacts of the development. Considering the lack of information near Ladd Marsh Wildlife area, one must question why.

Ladd Marsh is an important Migratory Bird Flyway according to the Oregon Department of Fish and Wildlife (ODFW 2008.) The Audubon Society lists it as an Important Bird Area. The number of bird species using this area has expanded in the last several years, however, in 2008 over 230 species of birds had been recorded on LMWA and over 120 species nest in the area and yet the developer appears to be ignoring the importance of not only the wildlife area, but also the habitat surrounding the wildlife area which is critical to the survival of birds moving in and out of the mitigation sites.

Signature/Name


Matthew B. Saladin

Address:

903 2nd St.
La Grande OR 97850

ESTERSON Sarah * ODOE

From: Patty Sandoz <psandoz@eoni.com>
Sent: Wednesday, August 21, 2019 7:35 PM
To: B2H DPOComments * ODOE
Subject: B2H Comment: Fire Hazard
Attachments: B2H Fire Hazards.docx

August 21, 2019

Kellen Tardaewether, Senior Siting Analyst

Oregon Department of Energy

550 Capitol St. NE

Salem, Oregon 97301

From: Patty Sandoz

905 14th Street

La Grande, OR 97850

(541) 963-7595

email: B2H.DPOComments@Oregon.gov

Regarding: THERE WILL BE AN INCREASED RISK OF WILD FIRES AND THERE IS A LACK OF LOCAL RESOURCES TO RESPOND IN A TIMELY AND EFFECTIVE MANNER.

The Boardman to Hemingway transmission line will increase the potential and severity of wildfires due to opening up additional access for people, lightning strikes, remoteness of much of the line, the fact that high voltage transmission lines increase the height and heat of fires along the transmission lines, and limitations on local human and equipment resources to fight wildfires in remote locations.

Both Union County and Baker County have submitted comments regarding the fact that they do not have the manpower or specialized equipment necessary to fight fires in the new remote areas which will have an increased risk of catastrophic fires. Part of the area which will be crossed by the transmission line has no designated fire protection other than the Oregon Forest service.

Given the timeframes for contacting and assembling volunteers, and the long travel times to respond to multiple areas along the transmission line, fires will have an opportunity to grow significantly prior to any fire response being able to access the area. Reports from volunteers called on to fight a fire which occurred during the construction of the Elkhorn Wind development stated they had difficulty accessing the area, the terrain was steep and there were multiple rattlesnakes in the area which made the job of fighting the fire very difficult.

Both Union and Baker Counties have submitted written comments to the Oregon Department of Energy stating they would need additional manpower and equipment if they are to be in a position of being able to effectively protect the citizens and resources from potential wildfires resulting from the development of the transmission line.

This is a serious issue due to the fact that the developer has indicated their intent to rely upon local resources in the event a fire occurs along the transmission line.

Sincerely,

Patty Sandoz

Address:

905 14th Street

La Grande, OR 97850

August 21, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

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Sincerely,
Patty Sandoz

Address:
905 14th Street
La Grande, OR 97850

August 21, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

From: Patty Sandoz
905 14th Street
La Grande, OR 97850
(541) 963-7595

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment and object. In eastern Oregon there are no 500-kV transmission lines. B2H is very large, sometimes three times the size of current lines in the area.

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.

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.

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.

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.

Sincerely,

Patty Sandoz

Address:
905 14th Street
La Grande, OR 97850

August 21, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

From: Patty Sandoz
905 14th Street
La Grande, OR 97850
(541) 963-7595

To: Chairmen Beyeler and Members of the Council

Thank you for the opportunity to comment and object. The electric grid has been in the same basic form for 100 years. But the methods to address current and future needs is forward focused with introductions of alternate forms of renewable energy including solar panels and wind turbines. The pace of change in implementing these alternate forms is accelerating. At the same time, human consumption need is decreasing as people accelerate their own levels of conservation. There simply is no need for the Boardman to Hemingway power line.

We also must consider safety of all in these turbulent times. A focused generation of energy makes for a prime target for anyone with evil intentions.

High voltage, long distance power lines will be increasingly underutilized. These mega lines are both unstable and dangerous--they are fire hazards and they will destroy ecosystems along any proposed route.

The Boardman to Hemingway line is dangerous on many levels. It is not needed.

Sincerely,
Patty Sandoz

Address:
905 14th Street
La Grande, OR 97850

July 27, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes**
345-022-0020

(c) ...The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states *“The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.”* Idaho Power Corporation admits in ASC page B-12 that *“The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges.” IPCs stated original intention to the EFSC was the following: “Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

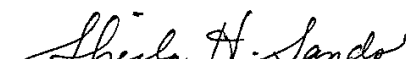
The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission “facility.” While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,


Signature

Sheila H. Sands
Printed Name:

Mailing Address: 1508 2nd Street, La Grande, OR 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 1.1 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: 1508 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:

APPLICANT FAILED TO INCLUDE ALL REQUIRED SOURCES OF NOISE IN THEIR MODELING OF NOISE IMPACTS OF DEVELOPMENT

Idaho Power did not include any of the items listed in OAR 340-035-0035(I)(b)(B)(ii), which are only exempt from the noise measurement when the development occurs on a previously used site. When establishing ambient noise level for a new development on a site not previously used, it states: "Sources exempt from the requirements of section (I) of this rule, which are identified in subsections (5)(b) - (f), (j), and (k) of this rule, shall not be excluded from this ambient measurement."

The applicant's noise modeling only includes the noise generated from the transmission line itself. Noise modeling must be corrected to include (b) Warning Devices, (c) sounds created by road vehicles, (d) Sounds from the operation of any equipment or facility of a surface carrier engaged in interstate commerce by railroad to the extent that such equipment or facility is regulated by pre-emptive federal regulations as set forth in Part 201 of Title 40 of the Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576 ; (e) bells, chimes, or carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is incomplete. Without having the information regarding these additional noise sources, the department and the siting council lack the information regarding how many noise sensitive properties are impacted and by how much.

A proposed order cannot be issued until the developer submits all the information regarding the noise impacts of this development. This information must be available to decide if the standard is met or if it can be met with additional site conditions.

Sincerely,



Signature

Printed Name: Sheila H. Sands

Mailing Address: 1508 2nd St.
La Grande, OR 97850

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:

Our family home is located on Morgan Lake Road. I bring my children from the city regularly to visit their grandparents and experience nature. We have direct experience of the tranquility of this spot. We are also clearly aware of the natural challenges this incredible place presents in the form of snow, fire, and wildlife sensitivity. With the current mood around wildfires throughout the country, we are particularly sensitive to the addition of power lines on the mountain, as well as the kinds of precautions that will be taken to avoid them around the power lines which will directly impact the wildlife we treasure so much. We believe this is not the right place for the power lines and the analysis done for the project is inadequate.

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 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 much of the information in the study 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 is 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..."

Yet, 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 nearby. Applicant could scarcely have chosen a site less representative of the absolute silence typical of the Morgan Lake setting.

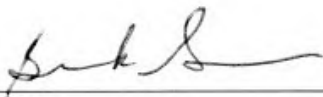
Page 146 (T-4-47) "The landscape character is natural appearing. Scenic integrity is high as the human developments are harmonious with the landscape."

Page 49 (T-44) "Vegetation will block views of the towers from most locations in the park." In reality, one tower would dominate the entrance to the park, all 130' in plain view. Within the Park, the trees bordering the lake are no more than 80' high. 130' transmission towers will rise more than 50' above those trees, dominating the current landscape.

Idaho Power does not provide a graphic representation of Morgan Lake Park, with the accurate height of existing trees, and elevation of towers above the trees. It simply concludes that the inescapable sight of 500 kV transmission lines and towers around a natural lake setting will have "no significant impact" on Morgan Lake Park.

This is the park whose baseline "should be maintained to preserve the maximum natural setting and to encourage solitude, isolation, and limited visibility of users" [because 50 years ago, no one ever imagined anything larger than a human being, might ever intrude]..."

I urge the Commission to deny this application for a site certificate until each comment submitted and sent to the Commission by August 22 has been thoroughly analyzed, and Idaho Power has provided credible evidence to support each of its conclusions of "no significant impact."



Signature

Name: Brook Sarson

Mailing Address: 60202 Morgan Lake Rd.
La Grande, OR 97850

TARDAEWETHER Kellen * ODOE

From: CINDY SCHAURES <lctbk@msn.com>
Sent: Saturday, June 29, 2019 12:05 PM
To: B2H DPOComments * ODOE; rstraub@blm.gov <rstraub@blm.gov>; TARDAEWETHER Kellen * ODOE; JMaffuccio@idahopower.com <JMaffuccio@idahopower.com>; comment@boardmantohemingway.com
Subject: Stop B2H

My name is Lucinda Schaures and I own property on the south side of La Grande just below where the proposed route for the B2H powerline is located. I do have many objections for B2H and would like to voice my opinions in this email. For expediency's sake, I will focus on just a couple of my concerns at this time.

1. There is a powerline that cuts across my acreage. It has caused me problems in many different ways. The land under the powerlines is virtually useless. I am getting ready to sell the property and have discovered that the value of my land is greatly decreased by the powerlines. The people who have property under or near the proposed powerlines will see their property decrease in value momentarily as well as aesthetically. The views of our beautiful valley will have a ugly scar on them. On a regular basis, someone comes to my property and enters without my permission spraying and cutting down the vegetation that grows directly beneath the powerlines. Is that going to happen on all the acreage that is affected by B2H? How will the land owners feel about that on their own property?
2. Last year, I had to tear down part of an old barn on my property. The soil underneath the barn is now covered in noxious weeds even though I planted grass, sprayed, and have pulled the weeds numerous times. The soil that will be disturbed during construction of the proposed power line will most likely be covered with noxious weeds that will spread upsetting the balance of our native vegetation. That is a huge concern and can add to the very high reality of fire that can be caused by the proposed powerlines.

As I previously mentioned, there are many other reasons that I and many other people I know are opposed to B2H. I do feel it is antiquated technology, a fire danger, dangerous to our environment, and the list could go on. There was a good letter that was published in The Observer that sums up many but not all of my concerns. The link to the letter is here: <https://www.lagrandeobserver.com/opinion/6989637-151/my-voice-nothing-to-gain-everything-to-lose>

Please listen to the many concerned citizens of my area and stop the B2H powerline.

Lucinda Schaures
P. O. Box 3096
La Grande, OR 97850

Sent from [Mail](#) for Windows 10

7/8/2019

MY VOICE: Nothing to gain, everything to lose: B2H transmission line is obsolete and devastating;

Published March 7, 2019 at 10:40AM

MY VOICE: Nothing to gain, everything to lose: B2H transmission line is obsolete and devastating

The B2H transmission line is a 20th century solution in search of a modern problem that doesn't exist. It's wasteful, obsolete and potentially devastating.

As of late, the City of La Grande's official position on the B2H Transmission Line project has been "No Position" or at best "Move B2H." During my campaign for city council this past fall, I studied this issue and I can absolutely understand why the city has taken that stance. "We don't have a dog in that fight" is a phrase we often hear at council meetings and work sessions, and the city's attitude about this issue is no different — but this time, it's due to a lack of understanding and a failure to fully appreciate the devastating consequences of this obsolete and completely unnecessary project. Consequences that absolutely give the city a number of reasons to join the effort to stop the B2H project.

Ashley O'Toole is a local real estate agent. He sits on several boards and committees in La Grande and Union County. In 2018 he was a candidate for La Grande City Council, and he recently joined the STOP

Here are some truths: Not a single tower will be built on city property, and not a single dollar of increased property tax revenue will benefit the city.

(Speaking of taxes, we've also found that the proposed, approximately \$600,000 tax benefit to Union County is merely a guess by Idaho Power and cannot be corroborated by anyone at the County Assessor's office or Oregon Department of Revenue — but that's a story for a later time.)

7/8/2019

MY VOICE: Nothing to gain, everything to lose: B2H transmission line is obsolete and devastating;

It's also true the city no longer has a "seat at the table" when it comes to working with Idaho Power, the county, state, BLM and other agencies that have a stake in this project.

However, that doesn't mean the city government and residents can't take action to help stop this project while there's still time.

Idaho Power is planning to utilize Morgan Lake Road, as well as the Modelaire/Hawthorne Loop during construction. I understandt Morgan Lake Road is a county road, so hopefully they're negotiating with Idaho Power, but who will pay to repair Gekeler Lane or Walnut Street? Modelaire and Hawthorne? I promise you the private corporation will not simply volunteer those funds.

The citizens of La Grande will be stuck footing a bill that could reach up to several hundreds of thousands of dollars.

The city government should also request that Idaho Power gives us the funds to more effectively respond to a fire, be it additional equipment or salary. These are not pipe dreams — local municipalities around the country have experienced successful negotiations in similar situations.

If you enjoy hunting, you'll probably be mad when some of our most cherished local hunting grounds are destroyed. If you enjoy afternoons at Morgan Lake, you'll be upset when Morgan Lake Road is completely jammed every day for more than a year with cranes, D8 Dozers, timber trucks and other equipment during construction; and you probably won't enjoy the view of those 180-foot towers when they're finished (nearly twice the height of the Sac Annex Building).

If you're a history buff like me, you'll be angry to find out that miles of Oregon Trail ruts will likely be destroyed. If this transmission line causes a fire (like the one responsible for starting the Camp Fire outside of Paradise, California, in 2018), you'll probably be upset when your house burns down.

7/8/2019

MY VOICE: Nothing to gain, everything to lose: B2H transmission line is obsolete and devastating;

La Grande has nothing to gain from this project and everything to lose. It will ruin our surrounding ecosystems, our hunting and recreational grounds, our historical sites, our property values, our view of the surrounding mountains and our ability to effectively protect ourselves from devastating fires. All of this, to help a private corporation's customers in Sun Valley, Idaho, receive hydro-power originally intended for us in Oregon and Washington. ("Sun" Valley, where solar power would be a much more modern, effective and cheaper energy solution for those customers.)

Since 2009, at least 11 proposals for new, high-voltage transmission lines around the country have been replaced by more cost-effective solutions.

Now it's our turn. There is still time to stop B2H, but it will require all of us getting mad and taking action. If you'd like to find out more information, or how you can join the effort, please email stopB2H@gmail.com . Our website, www.stopb2h.org, (<http://www.stopb2h.org>) is coming soon.

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:

PO Box 3076
LaGrande OR 97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal Order May 23, 2019.

Chair Beyeler and Members of the Council:

I am very concerned about the Boardman to Hemingway Transmission Project as it is proposed. My concerns are for the safety of myself and all of the citizens of La Grande if this line is permitted. My primary concerns are slope instability and wildfire hazard.

The proposed route sited to the west of La Grande is placed on a ridge noted to have instability and high risk for slides. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This slope instability is not inconsequential to a project like this. Recall in 2014, Oso, Washington, was the site of a catastrophic mudslide as the result of logging disturbance of the soil upslope from the town combined with significant rainfall. This resulted in 43 fatalities. We must learn from previous mistakes in not heeding the geologists' warnings. The area down slope from the proposed B2H line lies the Grande Ronde Hospital and Clinics, which employs hundreds of people and is the critical access hospital for this region. La Grande High School and Central Elementary School are also positioned down slope from the proposed towers. At least 100 homes are positioned down slope of the proposed towers. According to "Engineering Geology of the La Grande Area, Union County, Oregon" maps published by Schlicker, and Deacon (1971), the ENTIRE area of the hillside is deemed a "landslide area" in the La Grande SE quadrangle. This is not a safe place for a transmission line.

The next significant hazard to our community is wildfire. Oregon is ranked 8th Most Wildfire Prone state in the United States according to Verisk Wildfire Risk analysis. La Grande is ranked in the top 50 communities in Oregon with the greatest cumulative housing-unit exposure to wildfire as referenced in "Exposure of human communities to wildfire in the Pacific Northwest," by Joe H. Scott, Julie Gilbertson-Day and Richard D. Stratton (available at http://pyrologix.com/ftp/Public/Reports/RiskToCommunities_OR-WA_BriefingPaper.pdf). Finally the proposed route is in the vicinity of Morgan lake, the highest risk area (#1) in Union County in terms of wildland-urban interface, according to the County's Community Wildfire Protection Plan, August 10, 2005.

Cal Fire cites Pacific Gas and Electric equipment and power lines as the cause of numerous wildfires in the state in the last 2 years. This includes the Camp Fire in Butte County (2018), Tubbs Fire in Napa/Sonoma Counties (2017), Witch Fire in San Diego (2007), Valley Fire in Lake/Napa/Sonoma Counties (2015), Nuns Fire in Sonoma County (2017), which were all attributed to transmission.

The Boardman To Hemingway Transmission Line Project proposal places lines about 2000 feet or less than half a mile from the La Grande city limits, including medium density housing within the city as well as Grande Ronde Hospital. If a line from this proposed route were to spark a fire, La Grande residents would have little time to react. According to National Geographic, wildfires can move as fast as 6.7 mph in forests and 14 mph in grasslands. A fast-moving fire starting at the B2H lines could move to residential areas of La Grande and HOSPITAL in 10 minutes. This is frightening and an unacceptable risk for our citizens.

The current proposal for a Boardman to Hemingway transmission line does not adequately address the issue of landslides, basically by stating it will be mitigated somehow when the time comes to build. The proposal offers no analysis of wildfire risk, which is an unacceptable omission. All of the routes proposed are unsafe and create an unacceptable risk to the citizens of La Grande.

The Council should DENY the request for a site certificate.

Sincerely,



Name: Lucinda Schaures

Address: P.O. Box 3096
La Grande, OR. 97850

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I doubt it was extensive because it is entirely inaccurate:

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, which is developed with primitive campsites and fishing docks.

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300’ of Morgan Lake; it covers 27 acres.

Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. In their application, Idaho Power conveniently omits any references to Twin Lake.

Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe “extensive work on this siting study” ever occurred.

The applicant also used aerial photography to identify and avoid, where practical, irrigation pivots, houses, barns, private runways, other structures (e.g., wind turbines), and land use features. The corridors were adjusted using topographic maps to avoid or minimize distance across very steep slopes and other physical features less desirable for transmission line construction and operation. The corridors were again checked against the constraint and opportunity geographic information system (GIS) database to avoid, where possible, exclusion areas and areas of high permitting difficulty such as potential Oregon Department of Wildlife (ODFW) Category 1 habitats. The applicant then grouped the alternative corridors into 14 regions and evaluated on the basis of permitting difficulty, construction difficulty and mitigation costs. Using the constraint database, which incorporated the eight siting factors, the applicant reviewed the alternatives to determine the most reasonable corridor within each region. (DPO p. 11)

It is distressing to think that this is only one of many errors in Idaho Power’s ASC. If the IPC surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it’s disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety

If this slipshod effort is typical of IPC's careful attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake route rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by a individuals whose remote properties and summer cabins would have been impact by the line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the routes proposed for the B2H. The haste of this effort is evident in the abundant errors of omission and misinformation typical of the B2H ASCand DPO which will be addresssed in a separate comment.

Lucinda Schawres
Signature

Name: Lucinda Schawres

Address: PO Box 3096
La Grande OR 97850

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 6/20/19 Location: La Grande, OR
REGISTRATION FOR PUBLIC COMMENT

Name: Chelsea Schultz

Address: 1200 B ave

I represent (if applicable) _____
Print your name OR your organization/business name.

Send me future notifications about Council meetings via email.
My email address is: _____

I wish to address the Energy Facility Siting Council and/or

I wish to submit the following written comment:

I agree that the tower is a danger to
the environment, animals, and humans. Its is
NOT worth the ~~re~~ damage it will' cause.
stop BZH Coalition

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

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

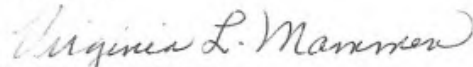
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

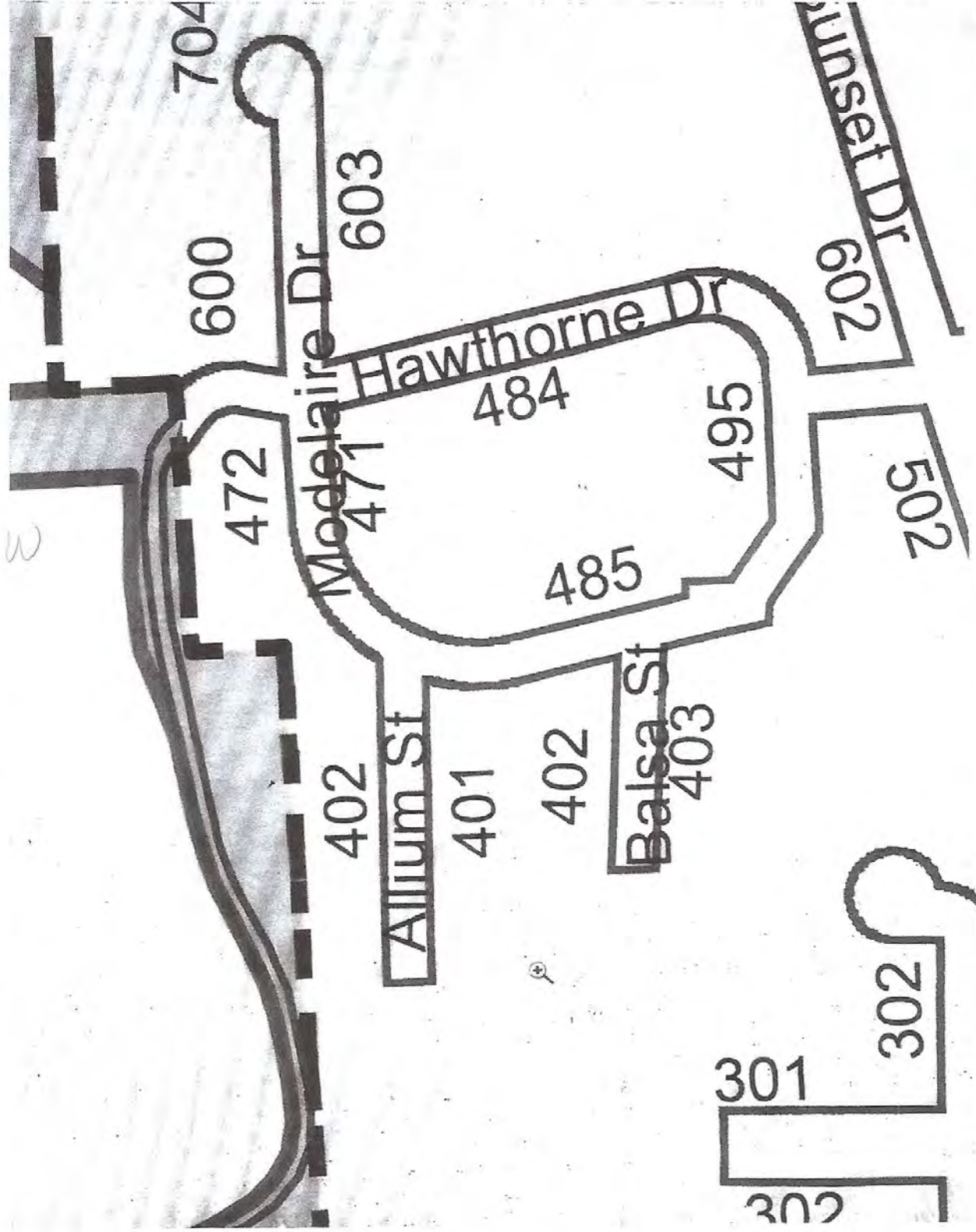


Exhibit 3

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



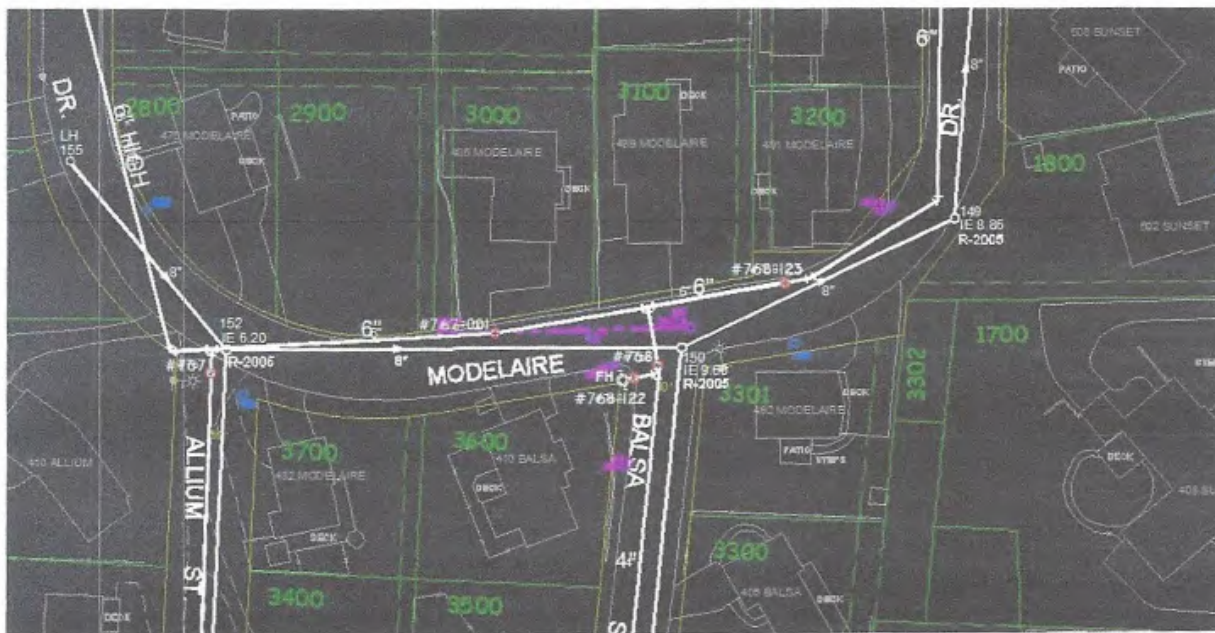
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

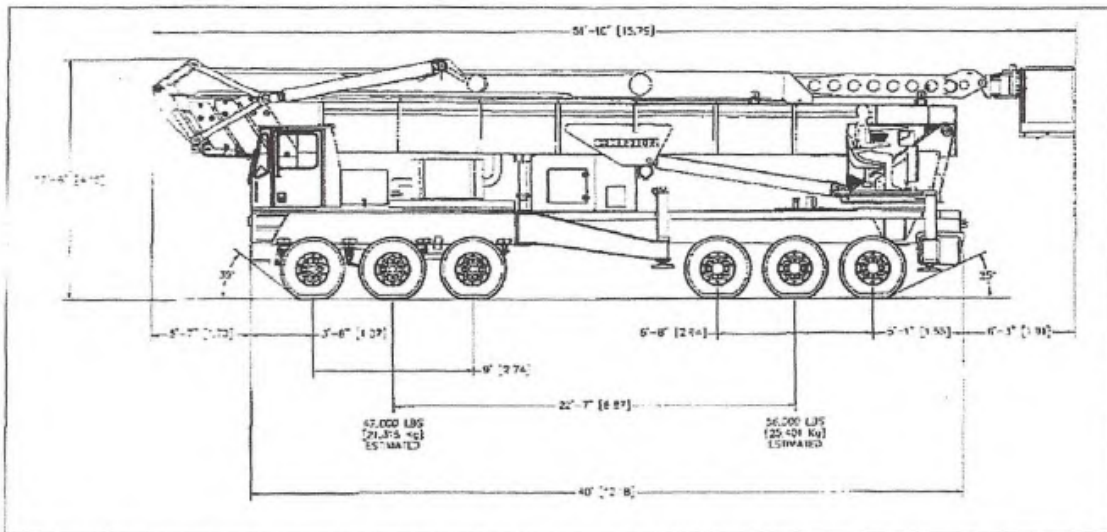


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

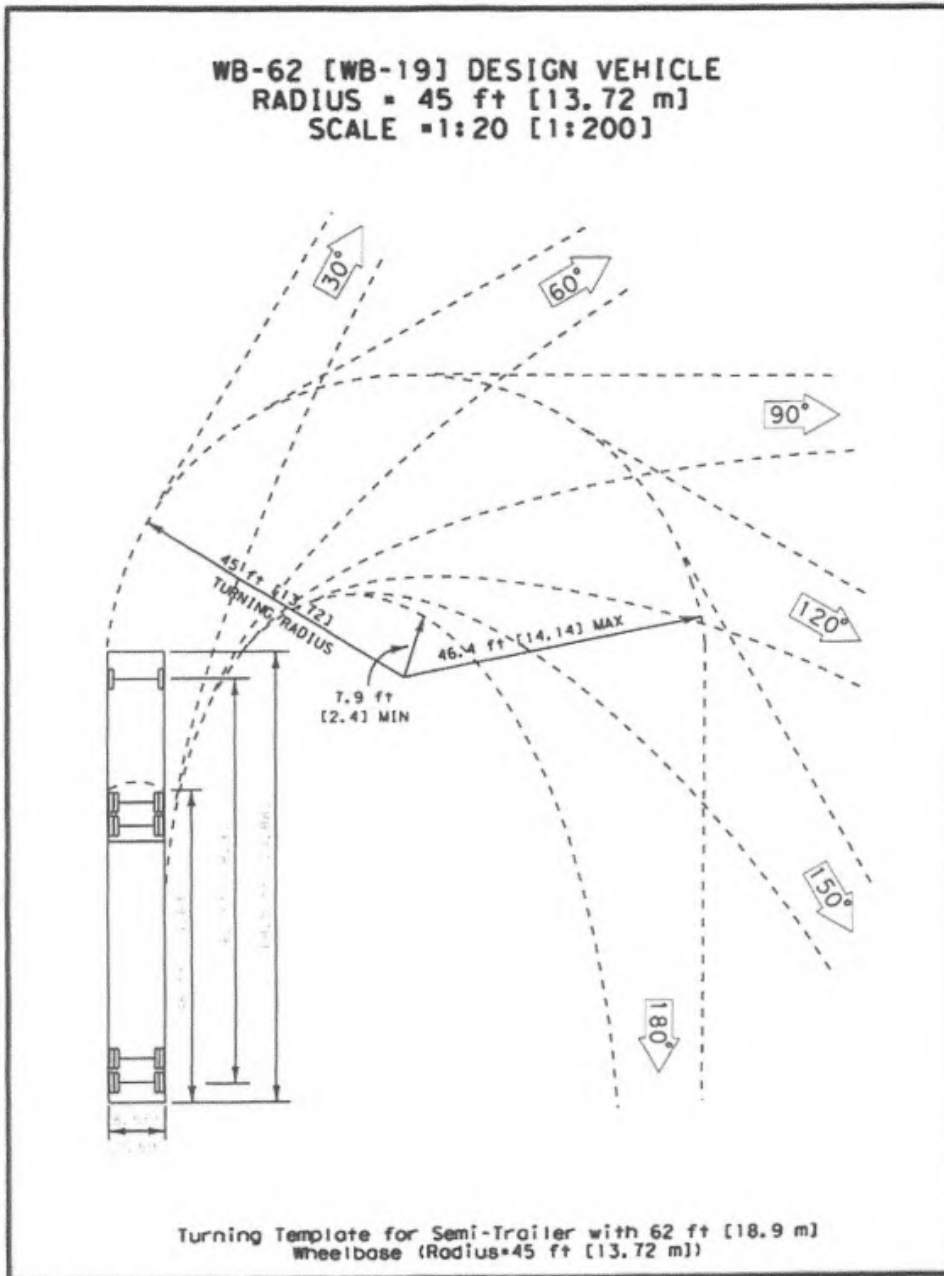


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

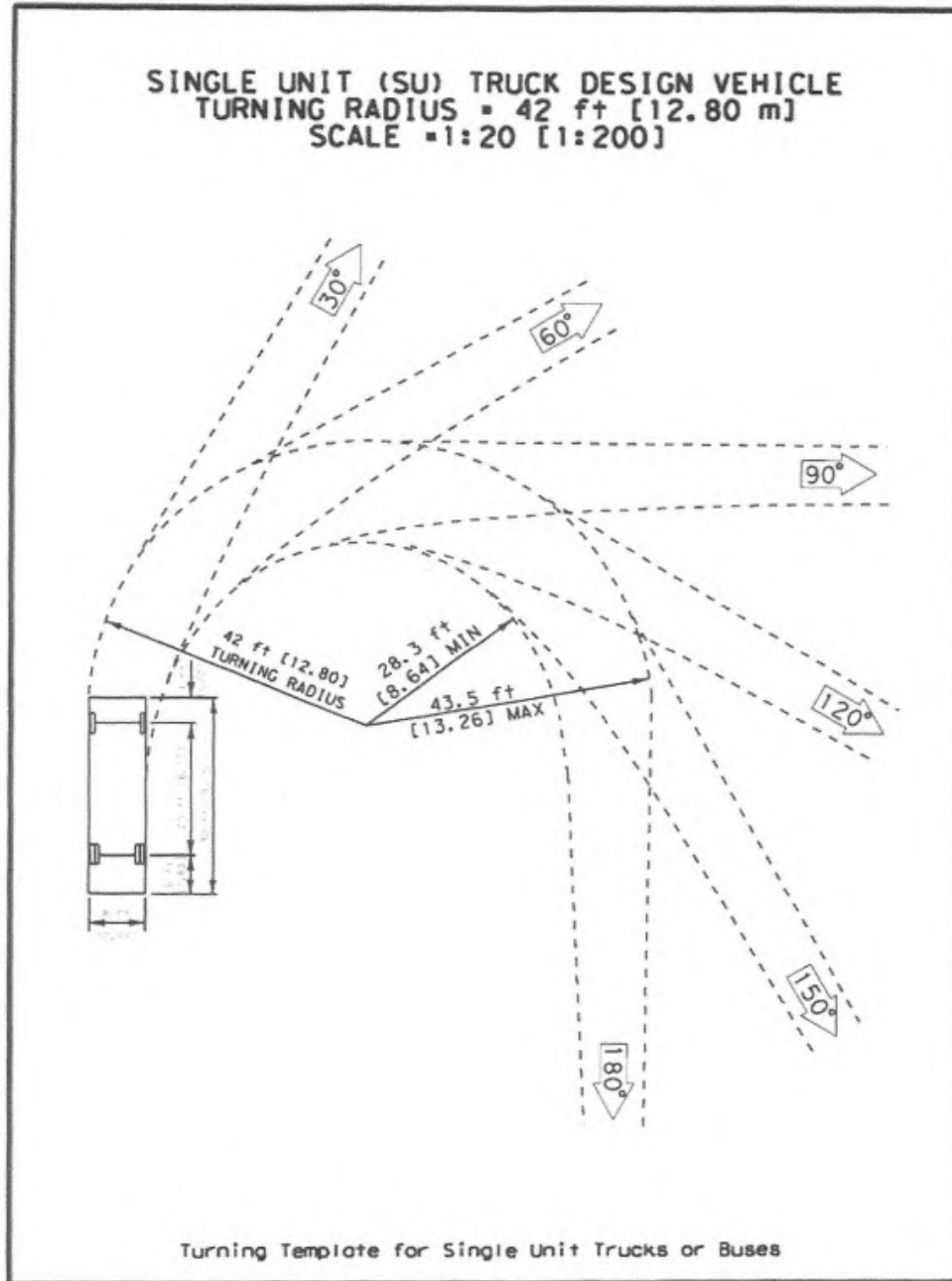


Exhibit 15

**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.

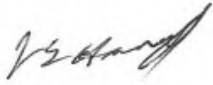
Section 17. TRUCK ROUTES

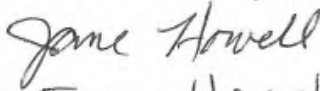
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

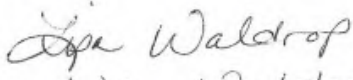
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

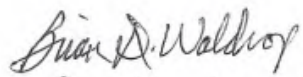
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

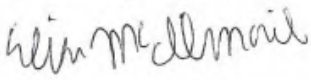
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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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SIGNATURE 
PRINTED NAME Lisa Waldrop
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SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
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EMAIL bdwaldrop58@gmail.com

SIGNATURE 
PRINTED NAME EUSE McILMAIL
ADDRESS 476 MODELAIRES DR.
EMAIL mcilmil1154@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850
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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

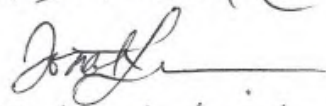

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell@EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

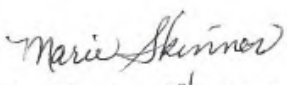

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

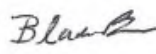

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

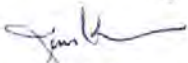
ADDRESS


EMAIL

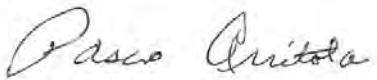

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

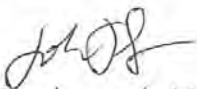
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@comi.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

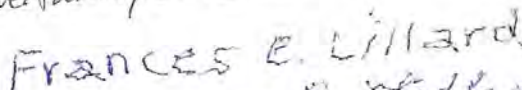
SIGNATURE 
PRINTED NAME Judie Arritola
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EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL PSTOLA@CHARTER.NET


SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

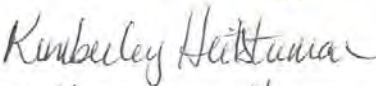
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

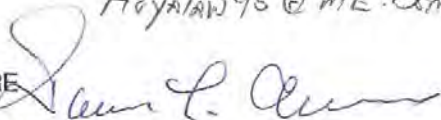
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

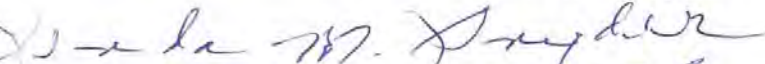
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

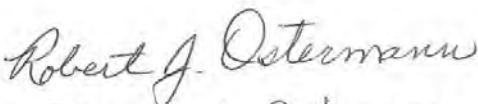
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Lonnie L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

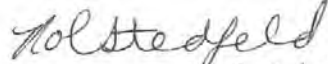
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL


SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

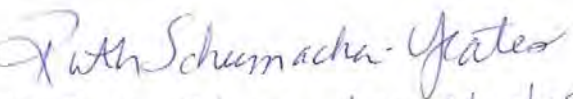
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

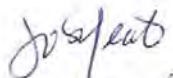
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com


SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

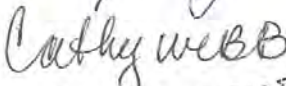
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

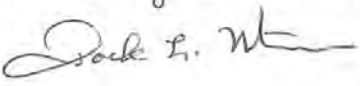
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

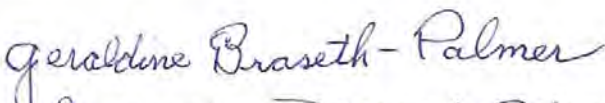

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com


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SIGNATURE 
PRINTED NAME Lois BARRY
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EMAIL loisbarry31@gmail.com

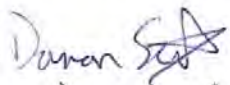
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
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EMAIL Buff Martin 27 @GMail .com

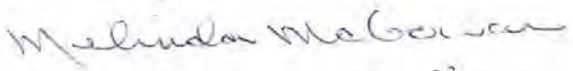
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
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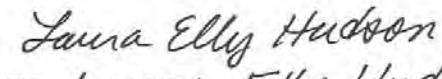
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SIGNATURE 
PRINTED NAME Damon Sexton
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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PRINTED NAME Keith D. Hudson
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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
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SIGNATURE *Anne G. Cavinato*
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SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
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EMAIL asherer@frontier.com

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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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SIGNATURE *Bert R. Freewing*
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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 *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

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.

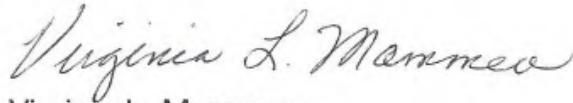
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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,

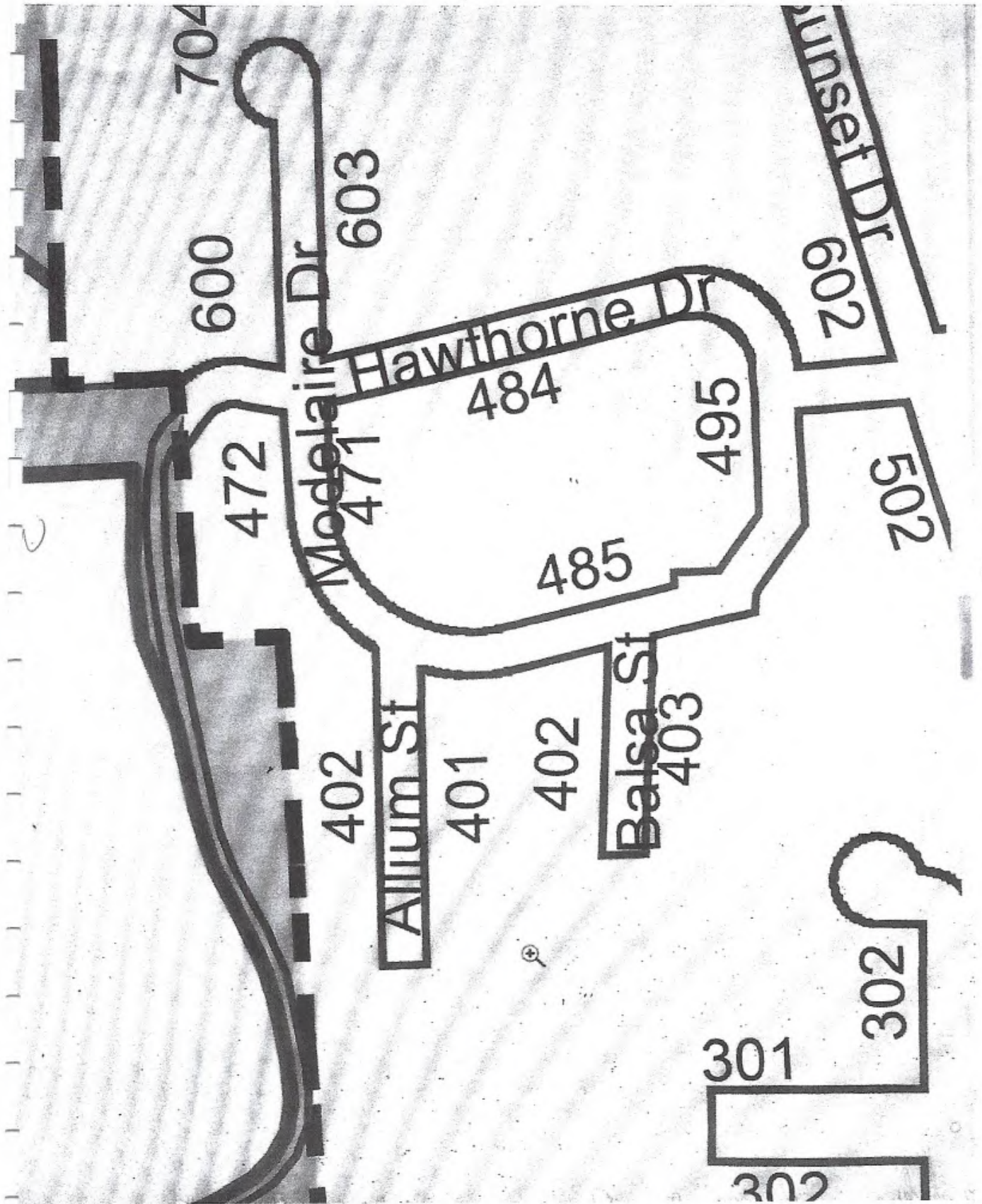


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



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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.



Exhibit 4a

8/5/2019

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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.

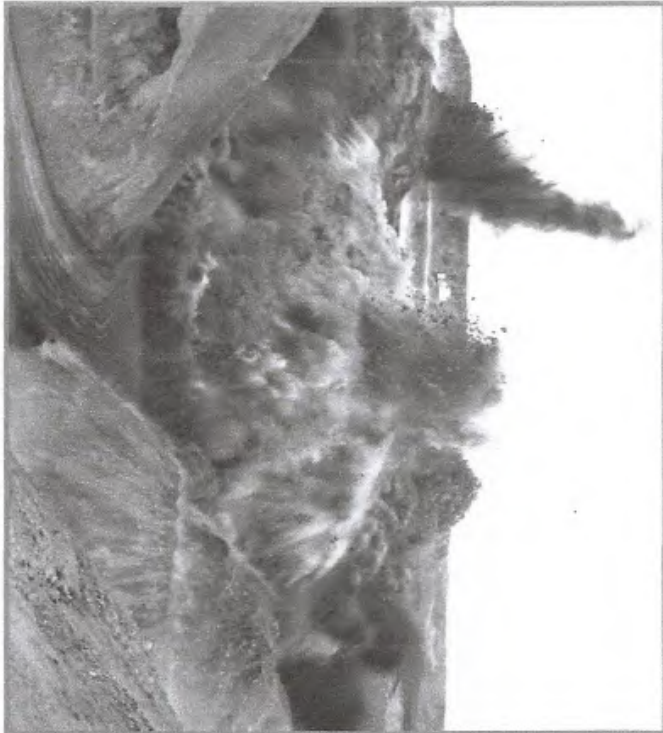
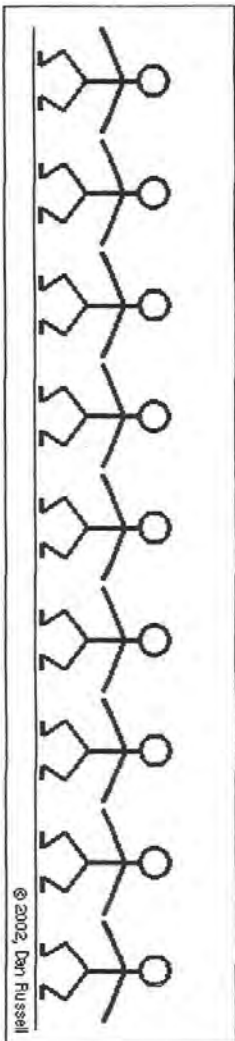


Exhibit 5b

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.

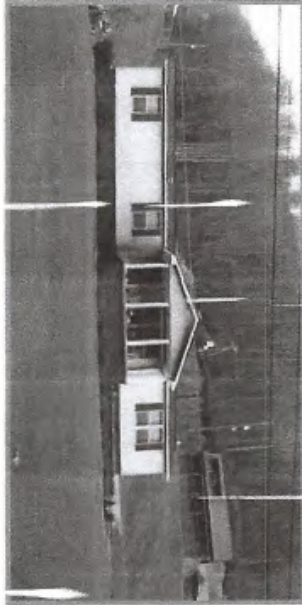
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

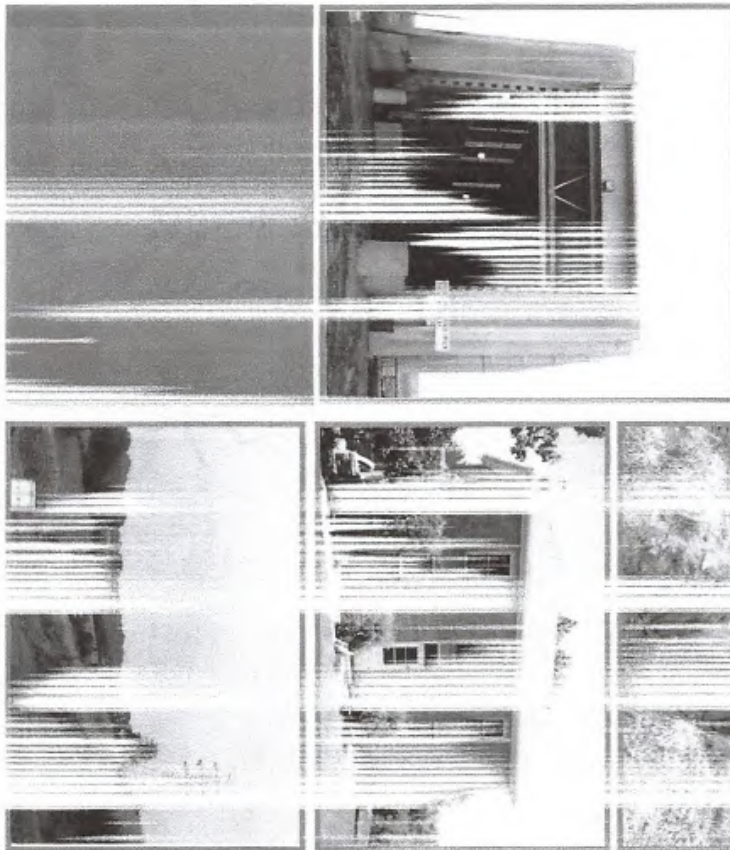
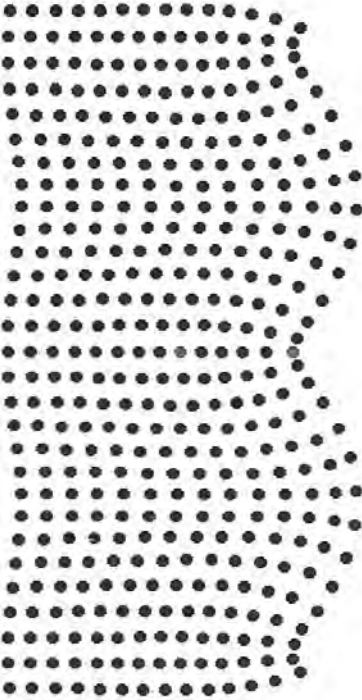


Exhibit 5D

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

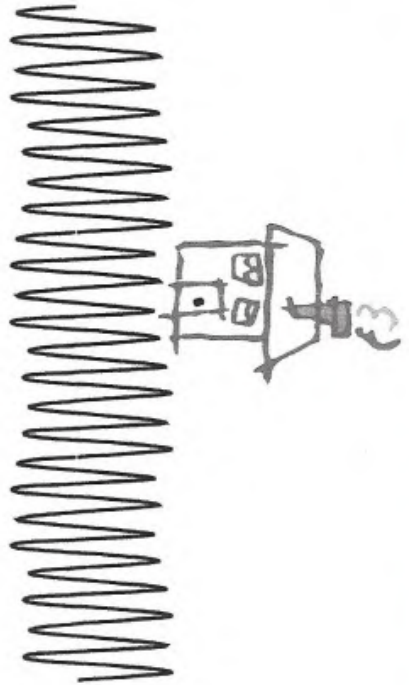
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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.



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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



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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



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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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,

8/4/2011

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](#)

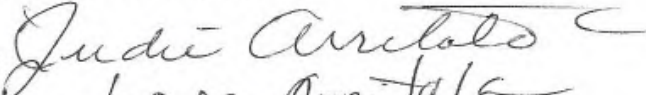


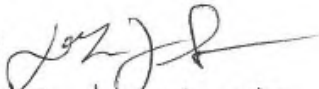
SCIENCE
NEWS


EXPERT
OPINION

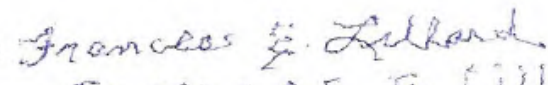
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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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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Shawn K. Mangum

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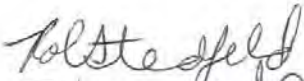
2409 E. M. Ave.


EMAIL

Hoyalaw95@me.com

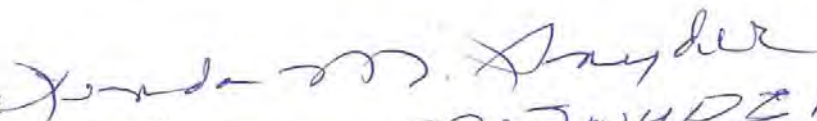
I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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SIGNATURE 
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SIGNATURE 
PRINTED NAME Linda M. SNYDER
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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 *Robin J. Ostermann*
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SIGNATURE *Robert J. Ostermann*
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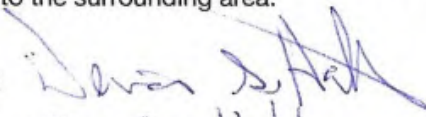
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE



PRINTED NAME

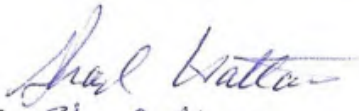
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

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Shad Hattan

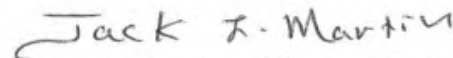
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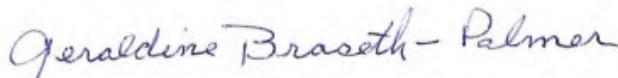
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GERALDINE BRASETH-PALMER

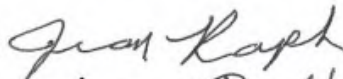
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Jean RAPH

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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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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 *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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PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
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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: Edwin Sedell

Address 97 Oak St
La Grande OR
97850

August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE DRAFT PROPOSED ORDER

The application is incomplete as Section X must include information regarding all receptors within 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.

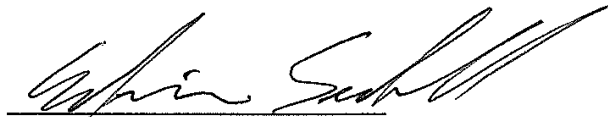
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related 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: *Edwin R Sedell*

Mailing Address:

*97 Oak St.
La Grande, OR
97850*

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

Page 62 (T-57) ASC refers to “extensive work in the siting study of the Morgan Lake Alternative.” I doubt it was extensive because it is entirely inaccurate:

Page 145 (T-4-46) Morgan Lake Park is described as 204 acres, containing one lake, which is developed with primitive campsites and fishing docks.

Morgan Lake Park actually contains two lakes. Morgan Lake covers 70 acres; the other, Twin Lake, [also known as Little Morgan Lake] is in plain sight, within 300’ of Morgan Lake; it covers 27 acres.

Twin Lake is undeveloped, a wild life and bird sanctuary, home to nesting bald eagles. It is designated as protected wetlands. In their application, Idaho Power conveniently omits any references to Twin Lake.

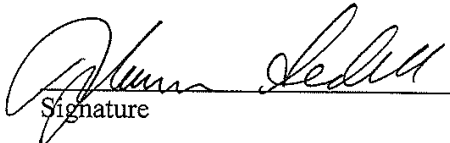
Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe “extensive work on this siting study” ever occurred.

The applicant also used aerial photography to identify and avoid, where practical, irrigation pivots, houses, barns, private runways, other structures (e.g., wind turbines), and land use features. The corridors were adjusted using topographic maps to avoid or minimize distance across very steep slopes and other physical features less desirable for transmission line construction and operation. The corridors were again checked against the constraint and opportunity geographic information system (GIS) database to avoid, where possible, exclusion areas and areas of high permitting difficulty such as potential Oregon Department of Wildlife (ODFW) Category 1 habitats. The applicant then grouped the alternative corridors into 14 regions and evaluated on the basis of permitting difficulty, construction difficulty and mitigation costs. Using the constraint database, which incorporated the eight siting factors, the applicant reviewed the alternatives to determine the most reasonable corridor within each region. (DPO p. 11)

It is distressing to think that this is only one of many errors in Idaho Power’s ASC. If the IPC surveying and engineering staffs are unable to detect a 27 acre lake within a 204 acre park, it’s disquieting to imagine the difficulties in identifying and analyzing less obvious and life-threatening situations like fault zones, slide areas and other potential dangers to public safety

If this slipshod effort is typical of IPC's careful attention to engineering a route, it may also explain IPC's egregious error in choosing to site the B2H on their preferred Mill Creek or alternative Morgan Lake route rather than on the carefully studied and analyzed BLM Environmentally Preferred route.

Following the DEIS, Idaho Power made a hasty and ill-advised effort to avoid litigation threatened by a individuals whose remote properties and summer cabins would have been impact by the line. If Idaho Power had chosen to follow the BLM Environmentally Preferred route, miles to the west of La Grande, rather than in the immediate view of 13,000 La Grande residents, there might have been ten people at the public meetings in La Grande, rather than the hundreds who have consistently appeared to protest various serious problems associated with the routes proposed for the B2H. The haste of this effort is evident in the abundant errors of omission and misinformation typical of the B2H ASCand DPO which will be addresser in a separate comment.



Signature

Name: Johanna Sedell

Address: 97 Oak Street
La Grande, OR 97850

August 12, 2019

Oregon Energy Facility Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E
Salem, OR 97301

Dear Chair Beyeler and Members of the Council:

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.

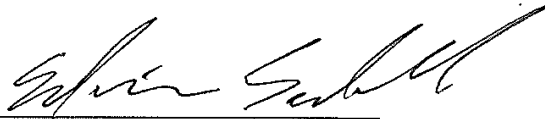
Page 156, (T-4-6) ASC purports to be a map of Morgan Lake Park. According to the map legend, the purple cross hatch amoeba-shaped area is Morgan Lake Park. That’s wrong. The purple cross hatch is Morgan Lake. The actual boundaries of the 204 acre park are not indicated. Obviously, it’s difficult to believe “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 addressec in a separate comment.



Signature

Name: Edwin Sedell

Address: 97 Oak St.
La Grande OR
97850

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)
)
)
)

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:

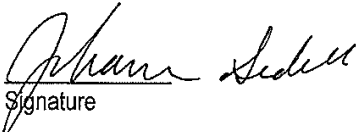
1. Does not comply with Noise Standards as no measurements were done at the Oregon Trail viewpoint or walking trails endpoint near milepost 146. Perhaps not a "Noise Sensitive Property," in the context of residential sleeping areas; however, certainly for tourists and visitors to the Interpretive Center 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: Johanna Sedell

Mailing Address: 97 Oak Street
La Grande, OR 97850

Email: johanna2008@yahoo.com

BILL HANSELL
STATE SENATOR
DISTRICT 29



OREGON STATE SENATE

To Members of the Energy Facility Siting Council:

As clean energy standards take effect in Oregon, and as utilities move away from traditional sources like coal, electrical transmission upgrades are becoming more important than ever. We need a more robust electrical grid to balance energy demand and intermittent wind and solar generation across multiple regions.

The Boardman to Hemingway (B2H) transmission line will help meet that need. I support the permitting and construction of the project.

Customers across the Pacific Northwest will benefit from the project. It will deliver clean energy in the winter months to the Northwest and give the Northwest's independent energy generators and utilities a path to sell excess energy to customers during the summer.

Construction of B2H will lead to increased spending at businesses in eastern Oregon, bringing an immediate economic benefit to the area. The line will also generate more than \$4 million in property tax revenue every year.

It is my understanding that there are ongoing discussions with some communities in my Senate District about the proposed route. I appreciate Idaho Power's willingness to engage with local communities to address any questions or concerns. I believe the company will continue to take local feedback into account during the final planning and construction stages of the project. Because of their good faith efforts to find solutions, I offer my support.

B2H presents a great opportunity to literally empower economic growth in the region. I hope the Energy Facility Siting Council will vote to approve a site certificate for the Boardman to Hemingway transmission line.

Thank you. Please contact my office if you have further questions.

Sincerely,

Bill Hansell

State Senator, District #29



BILL HANSELL
OREGON STATE SENATE
900 COURT ST NE S-415
SALEM, OR 97301

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FIRST CLASS



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Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR 97301

ELB-45B 97301



ESTERSON Sarah * ODOE

From: Shirlee Severs <shirleesevers@gmail.com>
Sent: Tuesday, August 20, 2019 3:14 PM
To: B2H DPOComments * ODOE
Subject: STOPB2H, Please
Attachments: Letter for B2H PDF.pdf

Attached is my letter as well as here:

Date August 20, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

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 have lived in Baker City for just 25 months. I fell in love with Eastern Oregon 3 years ago when traveling through from Nevada to Wyoming. I was enamored by the beauty; the Elkhorn Mountains to the west and the Eagle Caps to the east provided a contrast to the high desert and green valley of Baker City and surrounding areas. It is a part of Oregon I want to be part of.

Reading through the extremely lengthy draft proposal, *5 IV.F.5. Potential Visual Impacts from Facility Structures*, I have counted 166 statements using the words, **visual impact**. This is my primary concern. "extreme visual impact." There are 28 protected areas that were *carried forward for additional assessment*. Twenty eight, (28) areas at risk of being severely impacted VISUALLY by these transmission lines. Owyhee River, Ladd Marsh Wildlife, Oregon Trail Interpretive Center, Oregon Trail - Straw Ranch, Oregon Trail - Birch Creek —the list goes on.

In addition, *There are 12 protected areas (listed in Table PA-3) that would have 5 "medium to high intensity visual impacts"*

The draft proposal describes the impact and ITC proposed resolution. For most of them, *the applicant proposes 16 to use a **modified tower structure***. Modified tower structure?! Any and all tower structures will have significant impact to the beauty of Eastern Oregon. For this very reason the entire Boardman to Hemingway transmission line is a horrible idea and should be abolished. You all should be ashamed of yourselves for even considering this antiquated idea would come to fruition without a fight from the citizens of Eastern Oregon!

I urge you to consider carefully the Boardman to Hemingway transmission lines and get on board with 21st Century technology if you still feel it necessary to provide power to the state of Idaho! EFSC must deny the site certificate!

Thanks for taking the time to reconsider the impact this monstrosity will have on the people of Eastern Oregon,

Shirlee Severs
2415 Court Avenue
Baker City, OR 97814
775-622-5848

Date August 20, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E.
Salem, OR. 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

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Shirlee Severs
2415 Court Avenue
Baker City, OR 97814
775-622-5848

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

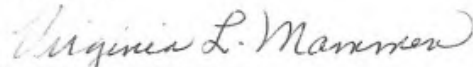
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

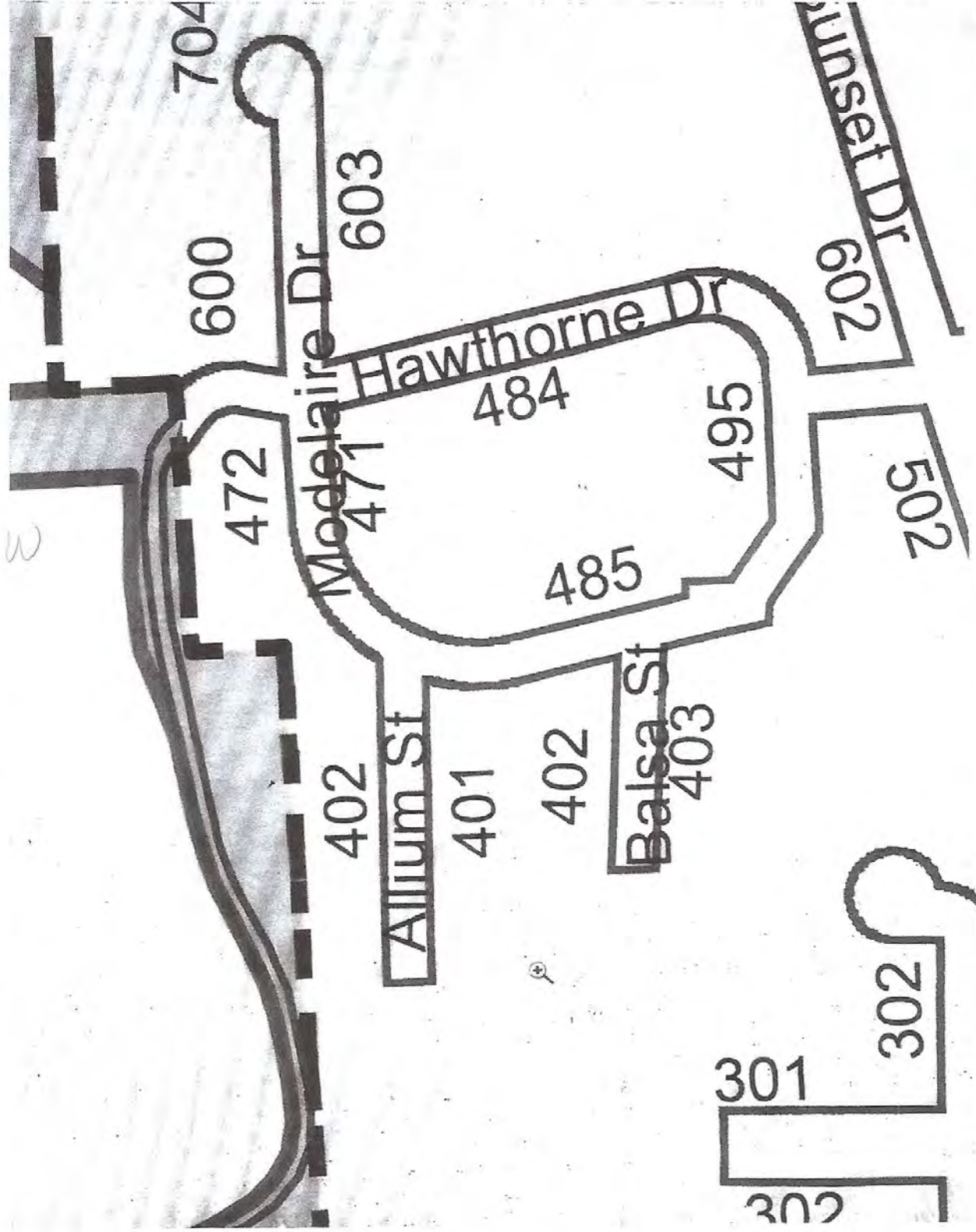


Exhibit 3

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



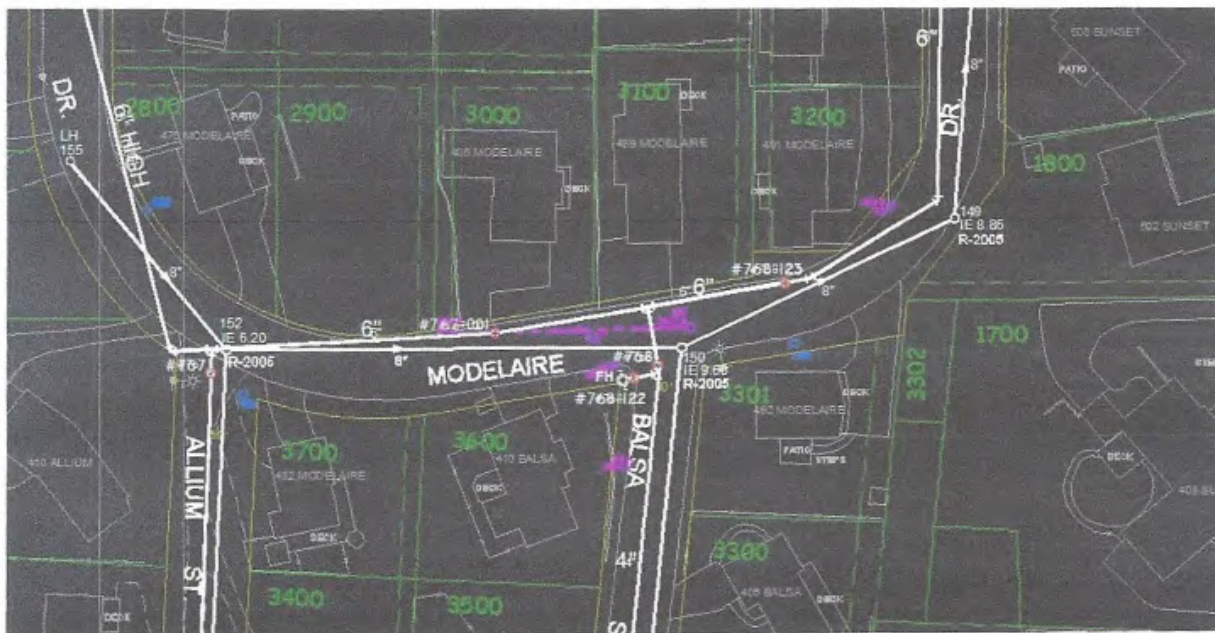
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

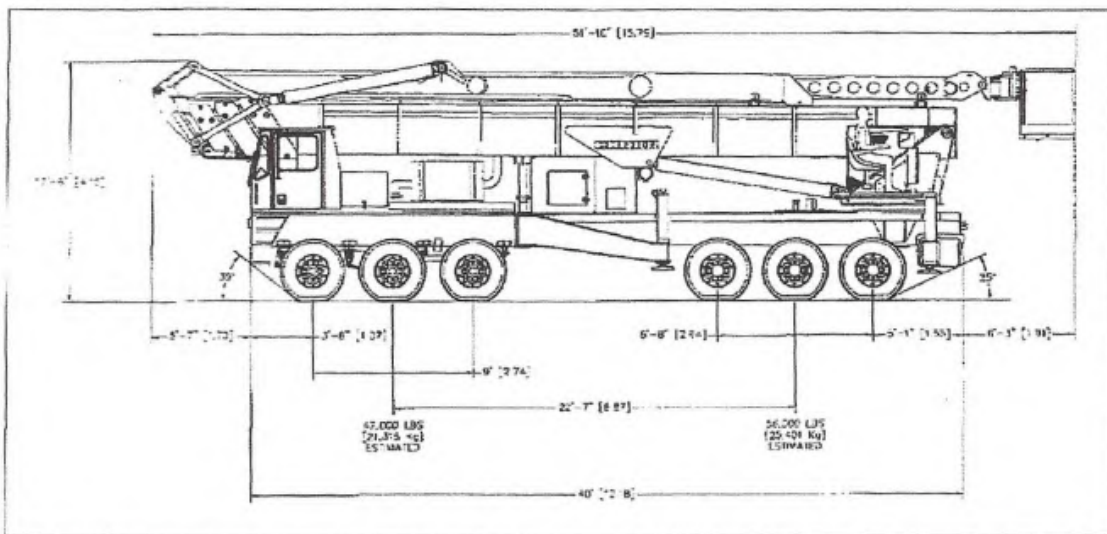


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

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

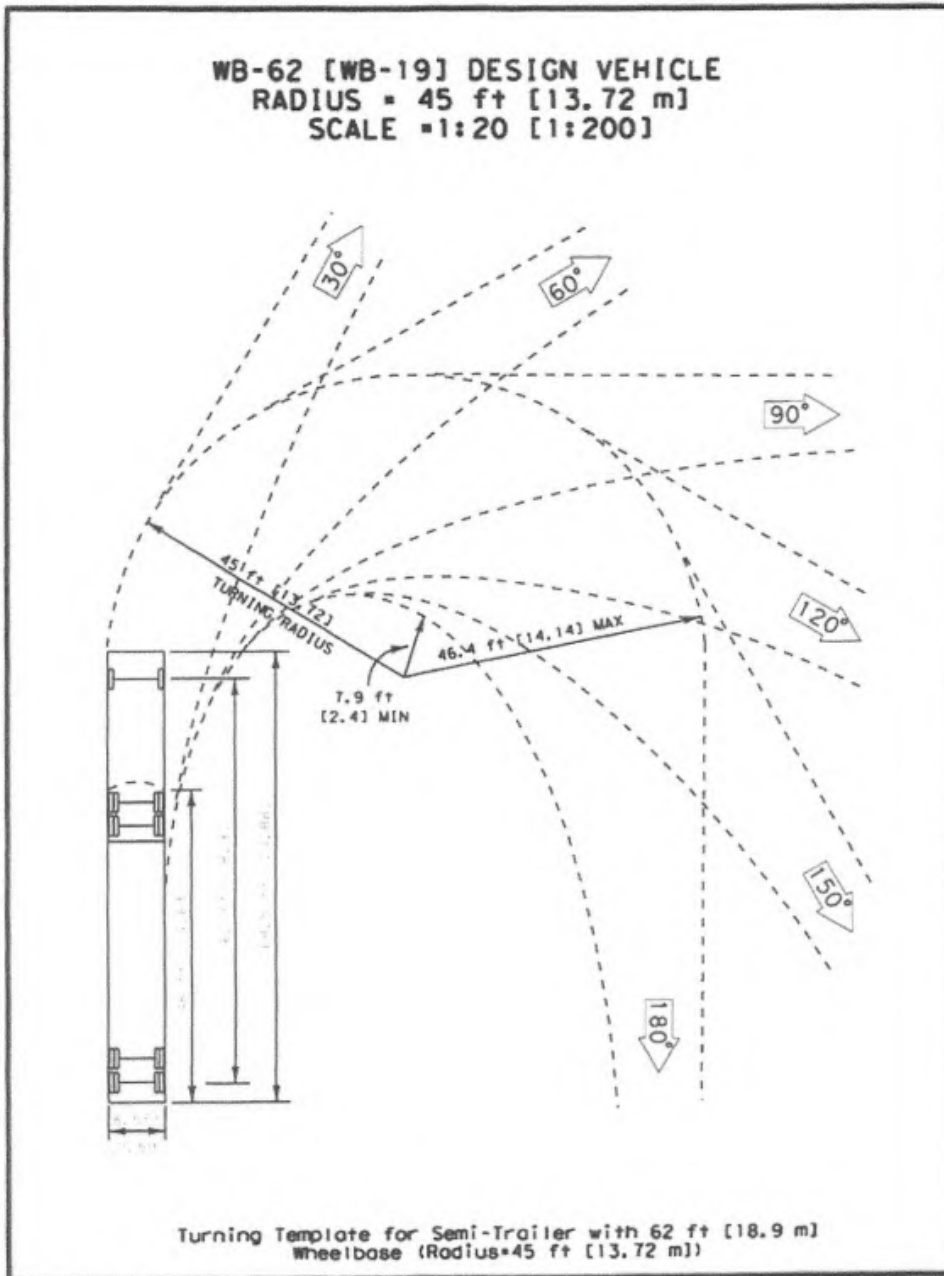


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

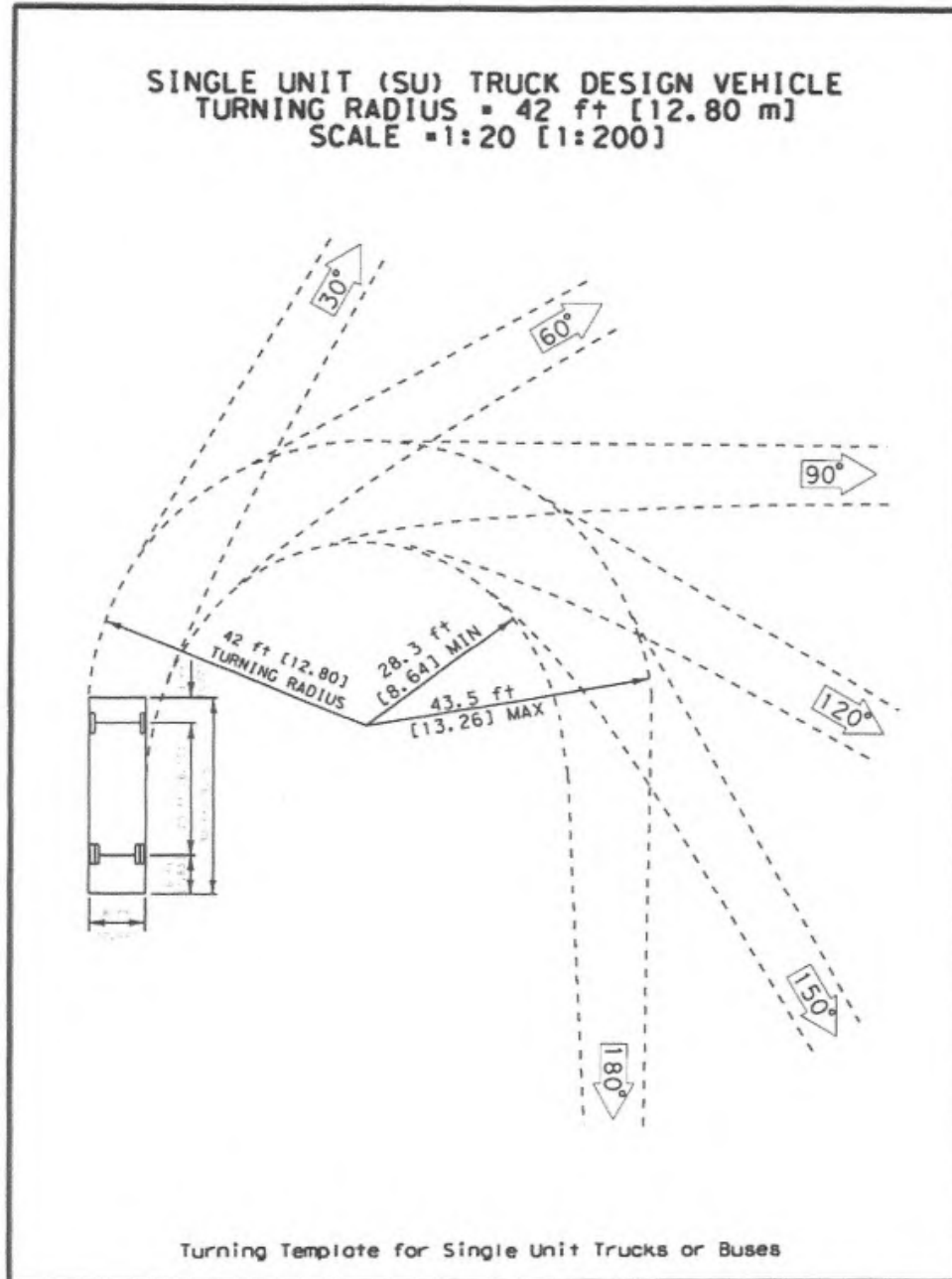


Exhibit 15

**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.

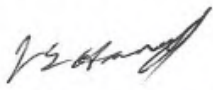
Section 17. TRUCK ROUTES

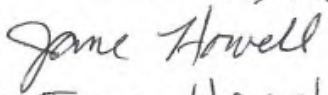
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

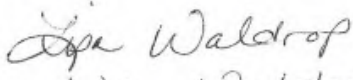
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

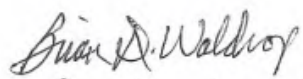
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

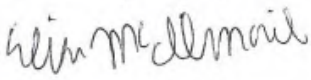
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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

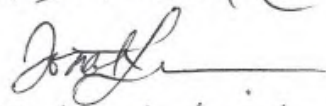

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

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EMAIL


Jonah Lindeman
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jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner
Marie Skinner
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marieskinner@hotmail.com

SIGNATURE

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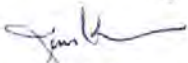
ADDRESS

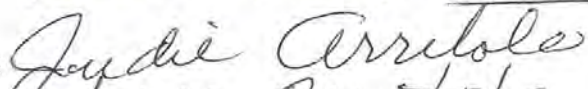
EMAIL

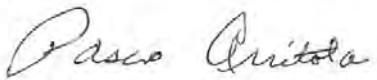
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com


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
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

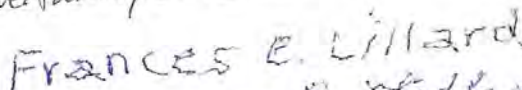
SIGNATURE 
PRINTED NAME Judie Arritola
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SIGNATURE 
PRINTED NAME Pasco Arritola
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SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

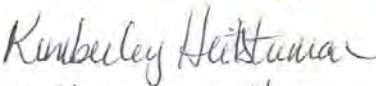
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

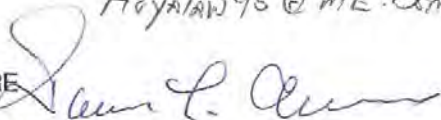
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

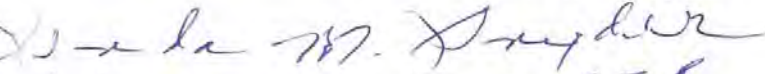
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

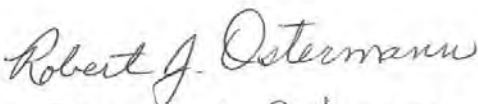
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL Kimheitstuman@hotmail.com


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 Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

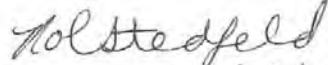
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL


SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

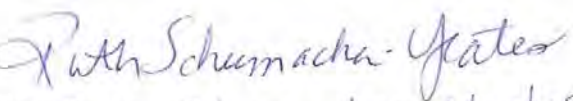
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

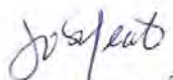
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
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SIGNATURE 
PRINTED NAME Robin Stedfeld
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EMAIL rstedfeld@yahoo.com

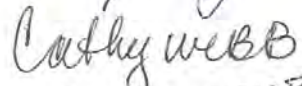
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

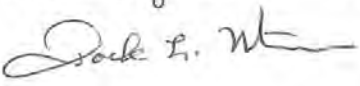
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

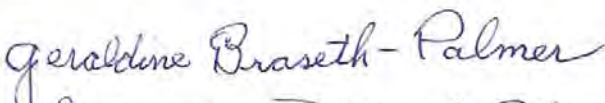

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com


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

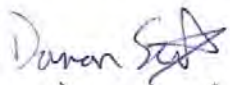
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

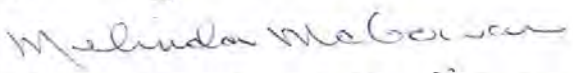
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 Goldenest Drive LA GRANDE, Ore 97850
EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jraph19@gmail.com

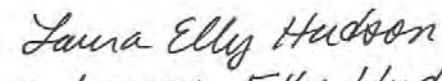
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME Damon Sexton
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PRINTED NAME Cory Sexton
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PRINTED NAME Melinda McGowan
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SIGNATURE 
PRINTED NAME Keith D. Hudson
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EMAIL Keithdhudson@gmail.com

SIGNATURE 
PRINTED NAME Laura Elly Hudson
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EMAIL ellyhudson@gmail.com

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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
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SIGNATURE *Anne G. Cavinato*
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EMAIL acavinat@eou.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR
EMAIL joehorst@eoni.com

SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
ADDRESS 91 - W. Hawthorne Dr. LaGrande, OR 97850
EMAIL asherer@frontier.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
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SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
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SIGNATURE *Bert R. Freewing*
PRINTED NAME Bert R. Freewing
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EMAIL jeanfreewing@gmail.com

SIGNATURE *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
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SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C*
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SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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EMAIL carolsummers1935@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 NTH St. LaGrande - OR 97850
EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
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PRINTED NAME
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EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.


In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰
These children also live in the neighborhoods to be affected by the noise
so they would be impacted coming and going to school, at home and also
while at school. To impose the constant possibility of loud noises is cruel,
disrespectful and totally unacceptable. ¹¹

For a project like this involving blasting and heavy machinery noise so
close to homes, schools, and medical facilities impacting hundreds of
peoples' daily lives, the day to day agitation, wondering what is coming
next, fear and being on constant alert are not just addressed by some type
of mitigation but must be addressed by a route that is much less impactful
to peoples' safety, sanity, and health.

Sincerely,

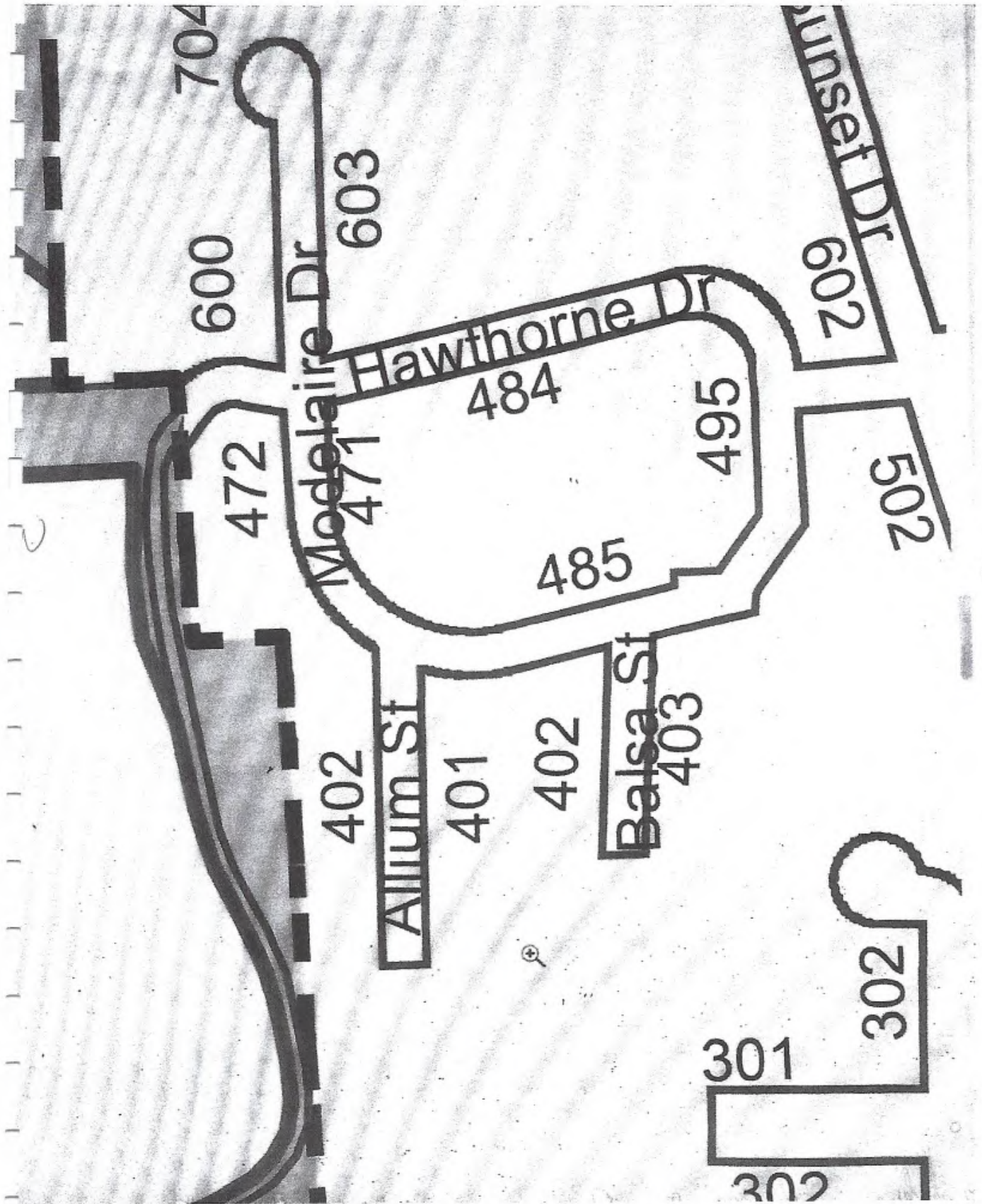


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

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.

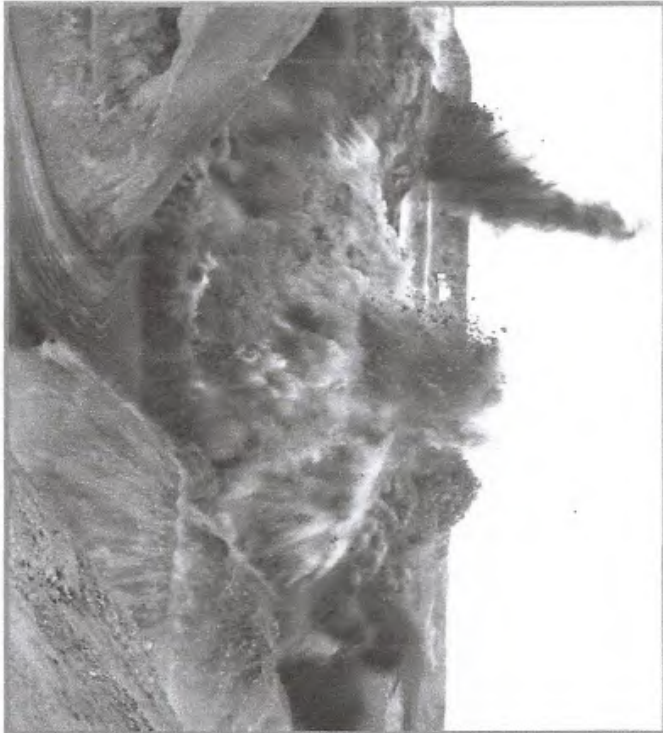
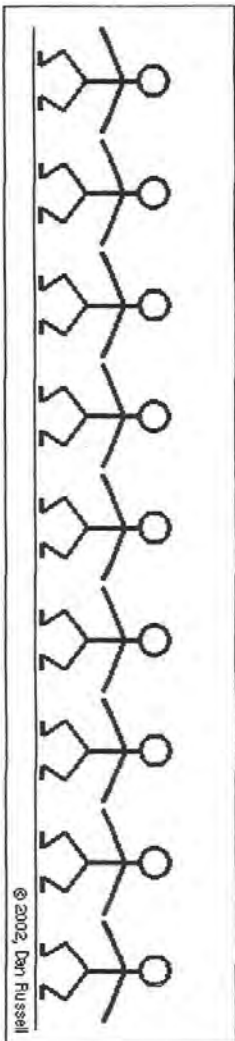


Exhibit 5b

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.

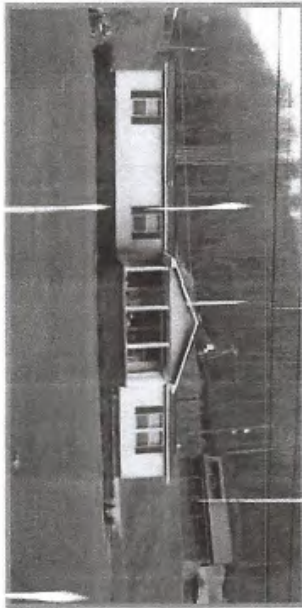
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

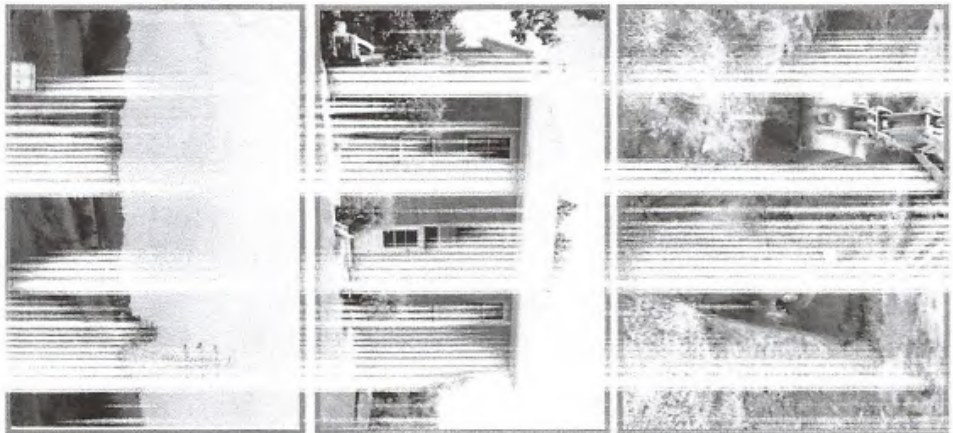
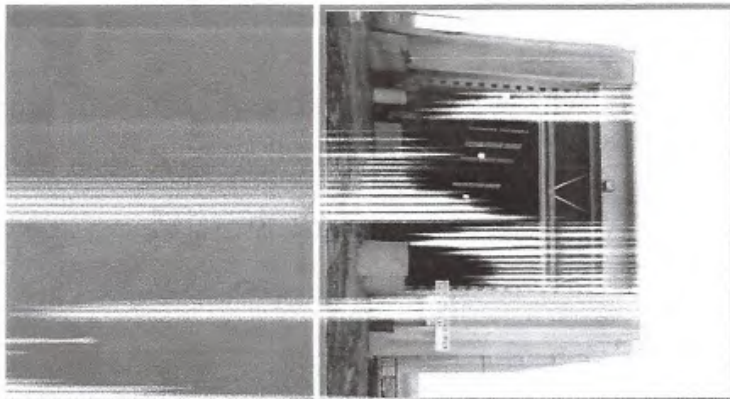
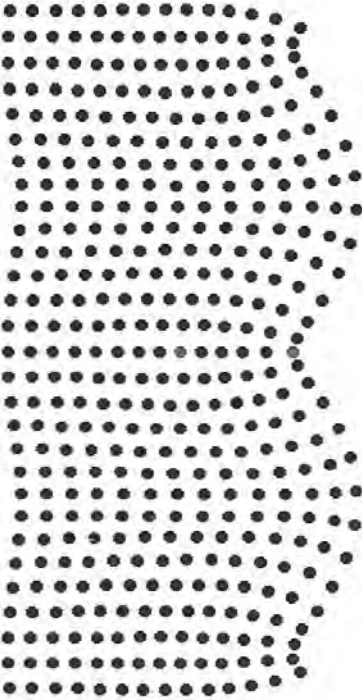


Exhibit 5D

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.

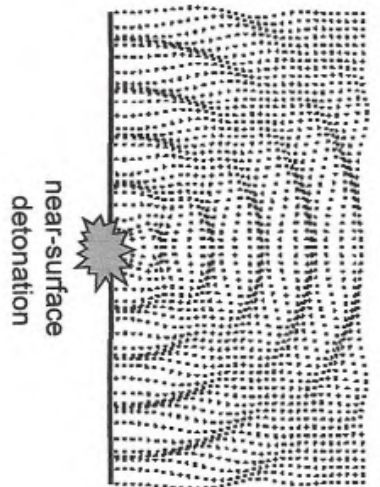
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

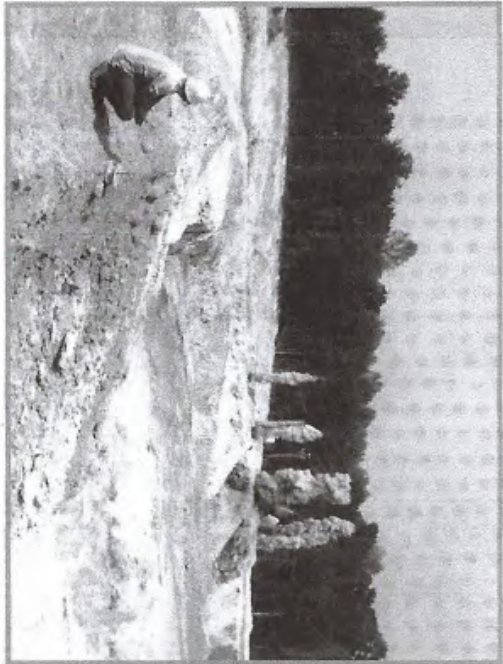
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

Airblast is a pressure wave that that may be audible or 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

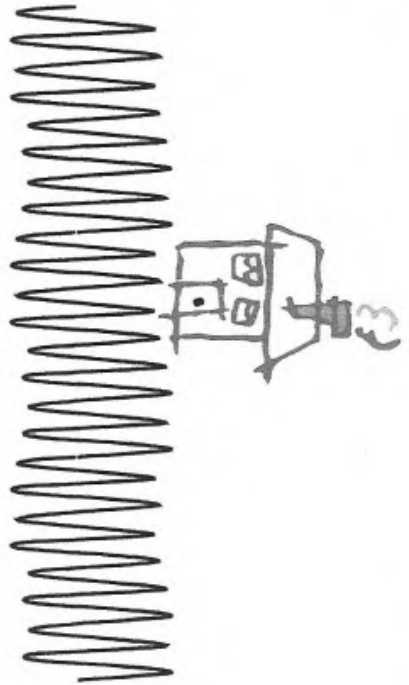
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

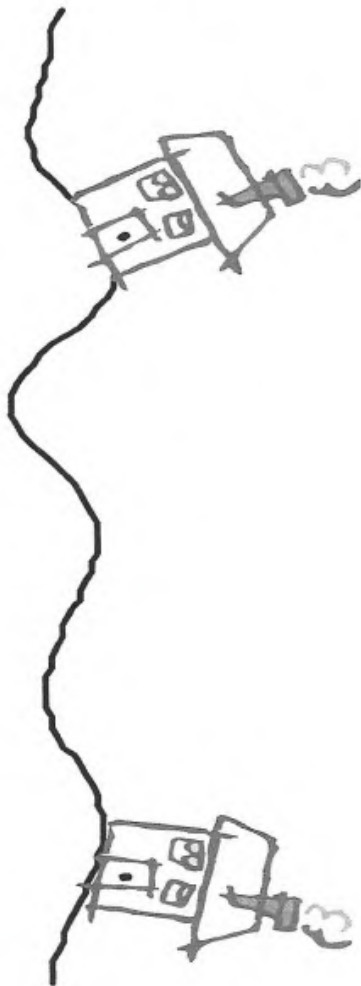


Ground Vibration Structure Response

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.

8/4/2019



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A noisy problem - Harvard Health

Exhibit 16
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HEALTH

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PAIN

STAYING
HEALTHY

CANCER

DISEASES &
CONDITIONS

MEN'S
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



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

Home

Nursing Education

Nursing News

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Headlines in Health

Clinical Insights

Nursing Career Development

Membership

Dangerous Decibels: Hospital Noise More Than a Nuisance

By Diane Sparacino, Staff Writer

Imagine a world where hospitals have become so noisy that the annoyance has topped hospital complaints, even more than for the tasteless, Jell-O-laden hospital food (Deardorff, 2011). If you're a nurse, you know that we're already there – with noise levels reaching nearly that of a chainsaw (Garcia, 2012). In fact, for more than five decades, hospital noise has seen a steady rise (ScienceDaily, 2005).

But it wasn't always that way. At one time, hospitals were virtually noise-free like libraries – respected spaces, preserved as quiet zones. The culture was such that a loud visitor might be silenced by a nurse's purposeful glare or sharply delivered "Shhh!" As early as 1859, the importance of maintaining a quiet environment for patients was a topic for discussion. In Florence Nightingale's book, "Notes on Nursing," she described needless noise as "the most cruel absence of care" (Deardorff, 2011).

Fast forward to 1995, when the World Health Organization (WHO) outlined its hospital noise guidelines, suggesting that patient room sound levels not exceed 35 decibels (dB). Yet since 1960, the average daytime hospital noise levels around the world have steadily risen to more than double the



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

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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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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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
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EXPERT
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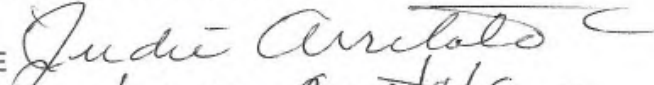


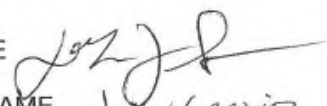
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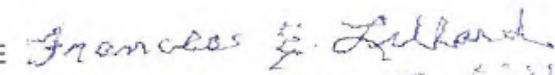
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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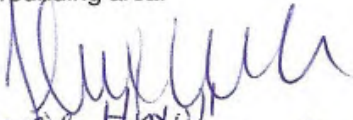
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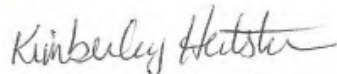
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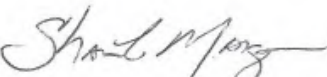
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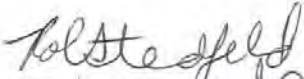
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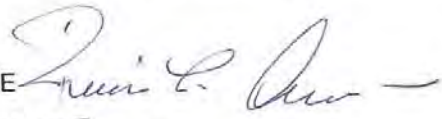
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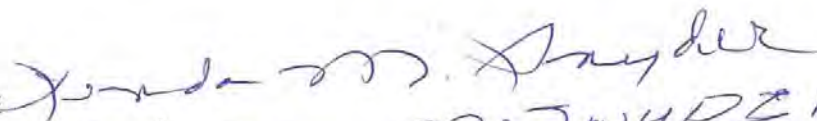
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EMAIL rstedfeld@yahoo.com

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 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
EMAIL

SIGNATURE *Robert J. Ostermann*
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaine Dr. La Grande, OR 97850
EMAIL

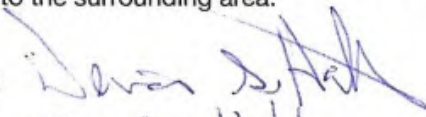
SIGNATURE *John Yeates*
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DRIVE LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

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

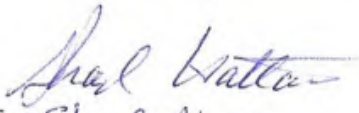
Denise Hattan

ADDRESS

507 Sunset Dr. La Grande, OR

EMAIL

SIGNATURE



PRINTED NAME

Shad Hattan

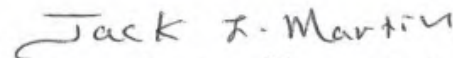
ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



PRINTED NAME

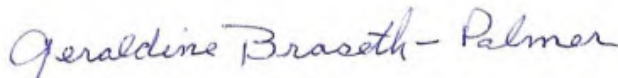
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

GERALDINE BRASETH-PALMER

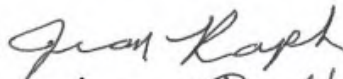
ADDRESS

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
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL sexton.damon@gmail.com

SIGNATURE *Coy Sexton*
PRINTED NAME Coy Sexton
ADDRESS 401 Balsa Street, La Grande, OR 97850
EMAIL coytris@gmail.com

SIGNATURE *Melinda McGowan*
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Lois Barry*
PRINTED NAME LOIS BARRY
ADDRESS P.O. Box 566, LA GRANDE, OR 97850
EMAIL loisbarry31@gmail.com

SIGNATURE *Cathy Webb*
PRINTED NAME CATHY WEBB
ADDRESS 1700 Cedar St. LA GRANDE, OR 97850
EMAIL thinkski@gmail.com

SIGNATURE *JoAnn Marlette*
PRINTED NAME JOANN MARLETTE
ADDRESS 2031 Court St. #8, Baker City, OR 97814
EMAIL joannmarlette@yahoo.com

SIGNATURE *Keith D. Hudson*
PRINTED NAME Keith D. Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL KeithDhudson@gmail.com

SIGNATURE *Laura Elly Hudson*
PRINTED NAME Laura Elly Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL ellyhudson@gmail.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
ADDRESS 489 Modelaire Drive, LaGrande OR 97850
EMAIL ylwd1910@gmail.com

SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL acavinot@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR. 97850
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
ADDRESS 209 SWAPLO LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

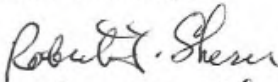
SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL rmaille@icloud.com

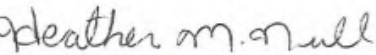
SIGNATURE *Carol Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Beketen Lane La Grande OR.
EMAIL carolsummers1938@gmail.com

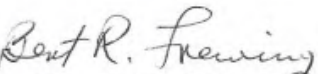
SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 4th Street - LaGrande - OR 97850
EMAIL

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 
PRINTED NAME Robert J. Sherer
ADDRESS 97w Hawthorne Dr, La Grande, OR 97850
EMAIL asherer@frontier.com.

SIGNATURE 
PRINTED NAME Heather M. Null
ADDRESS 492 madelaire Dr. La Grande, OR 97850
EMAIL hnull@coni.com

SIGNATURE 
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

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

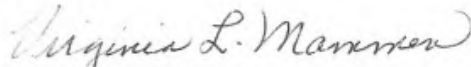
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

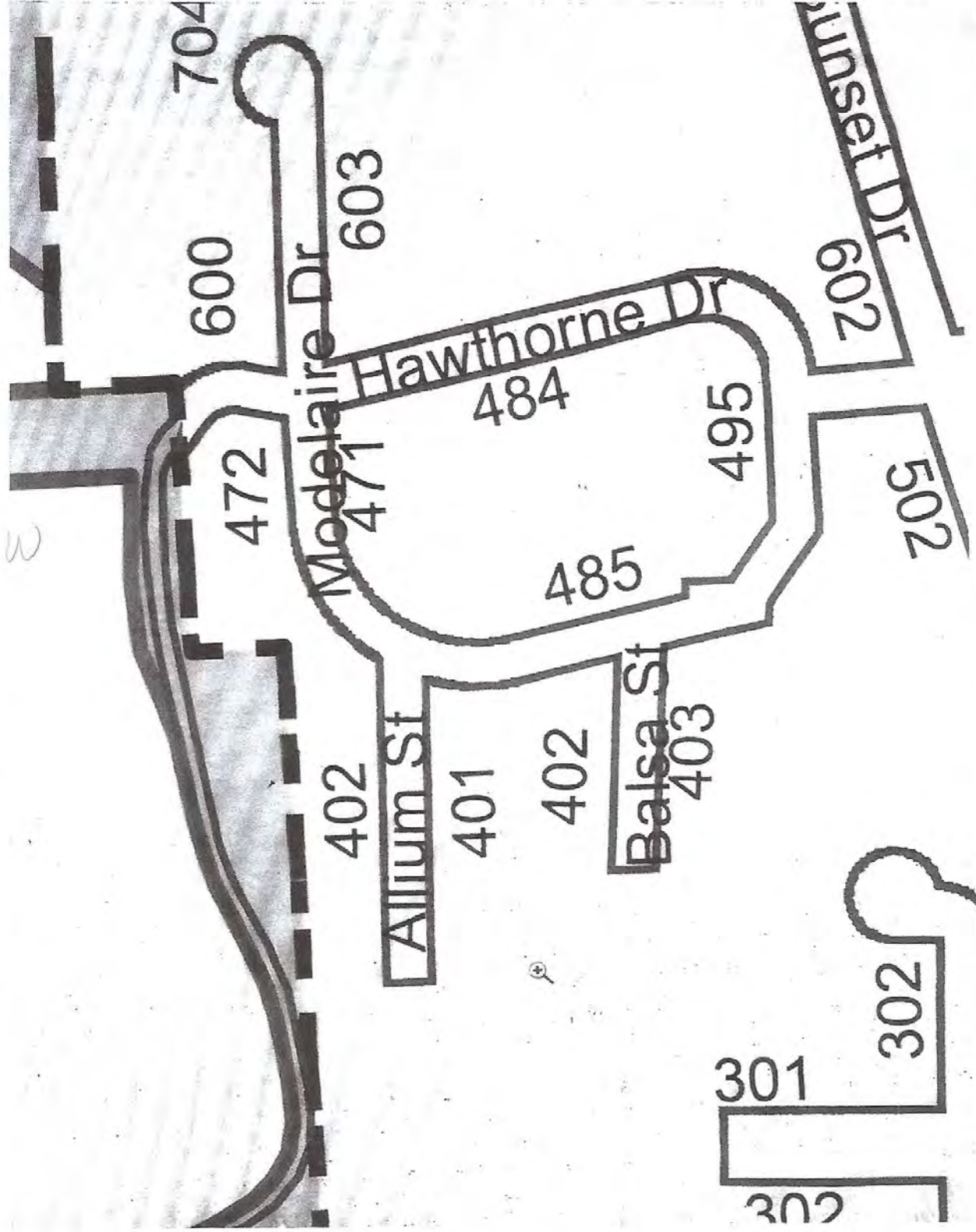


Exhibit 3

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



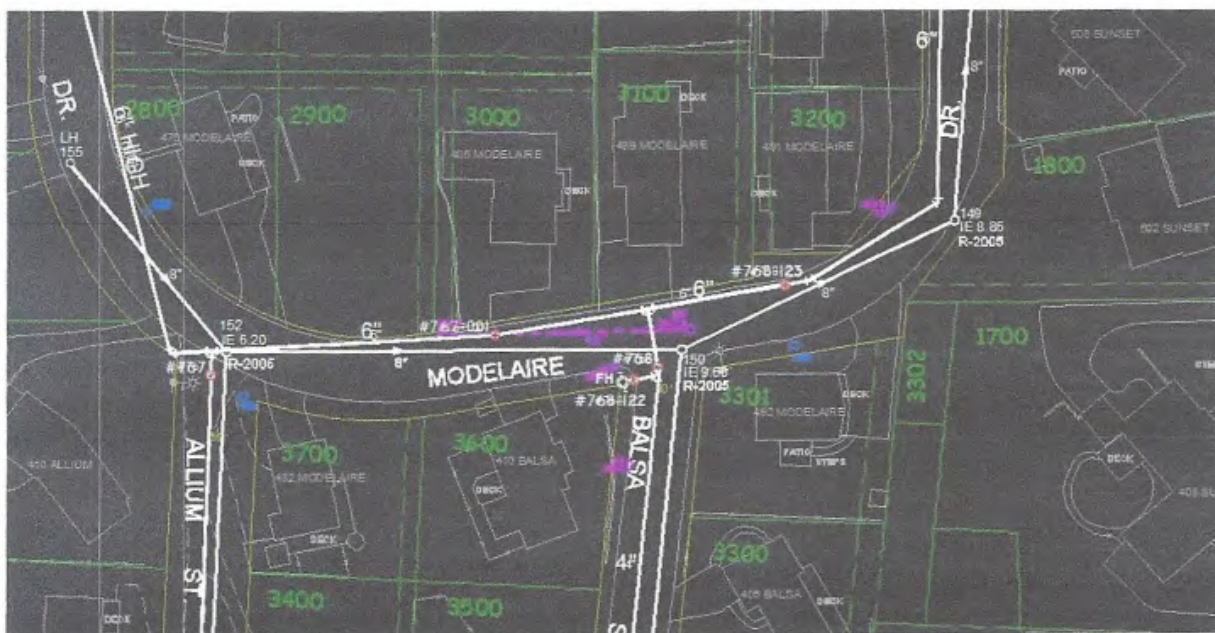
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

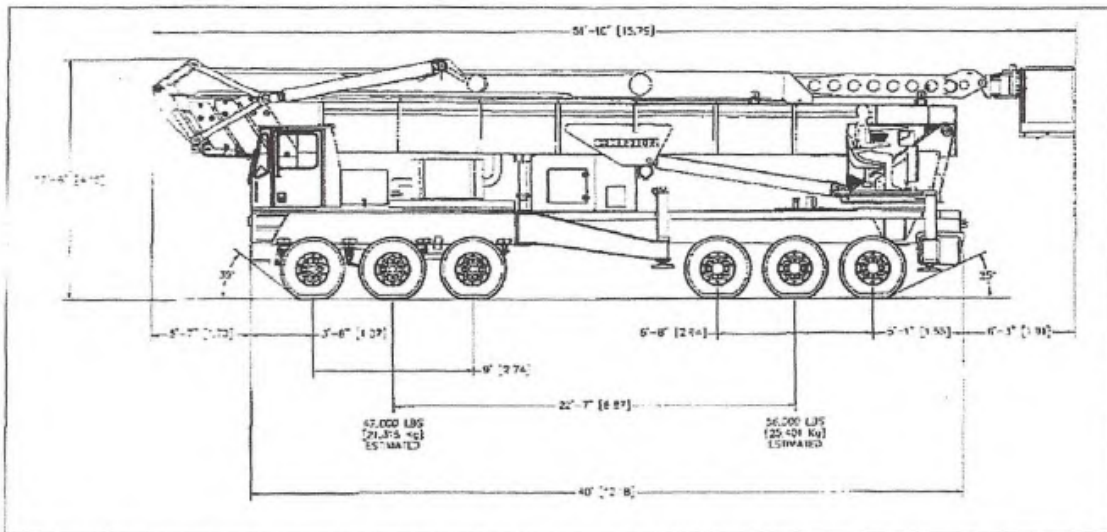


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

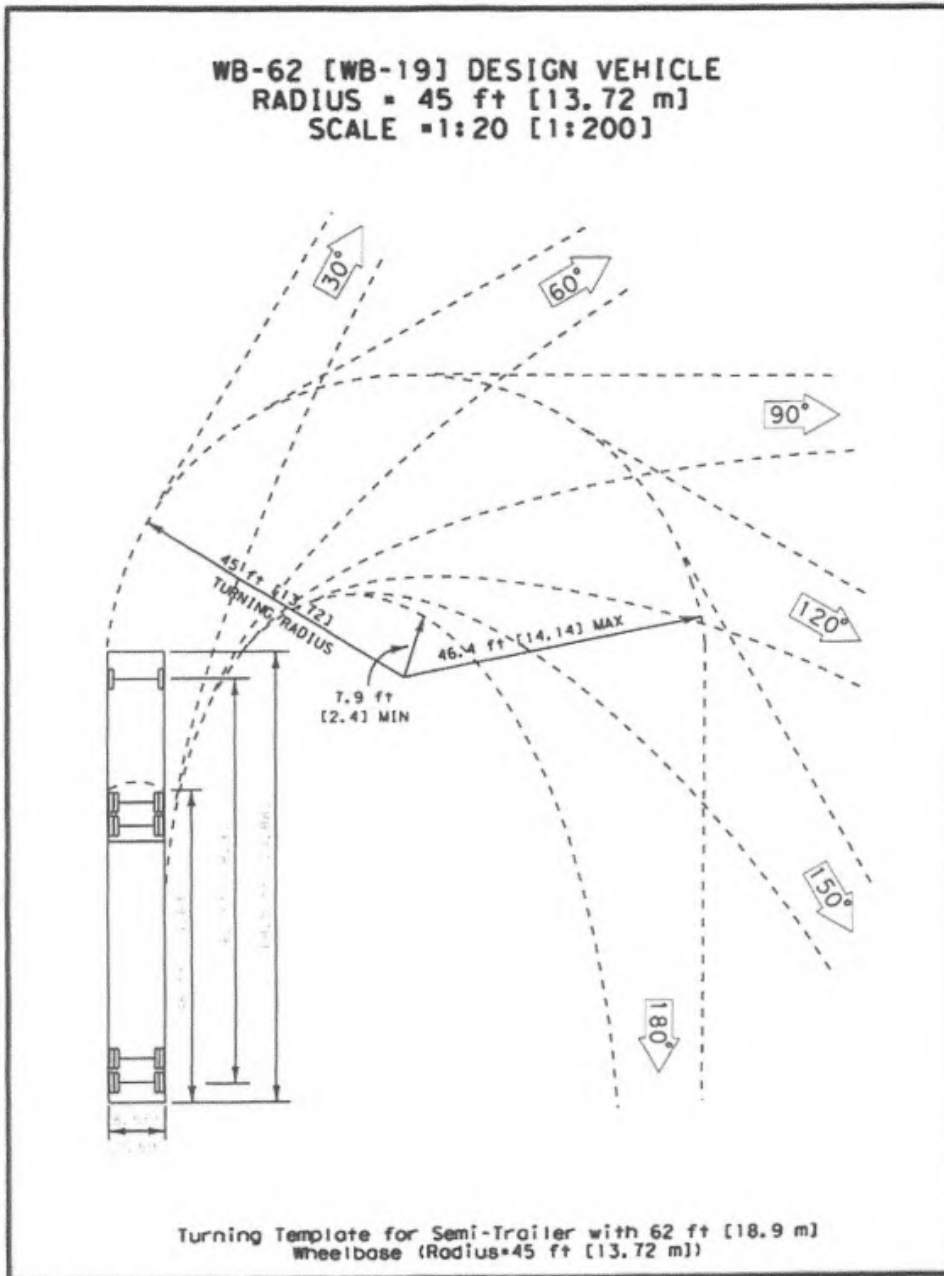


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

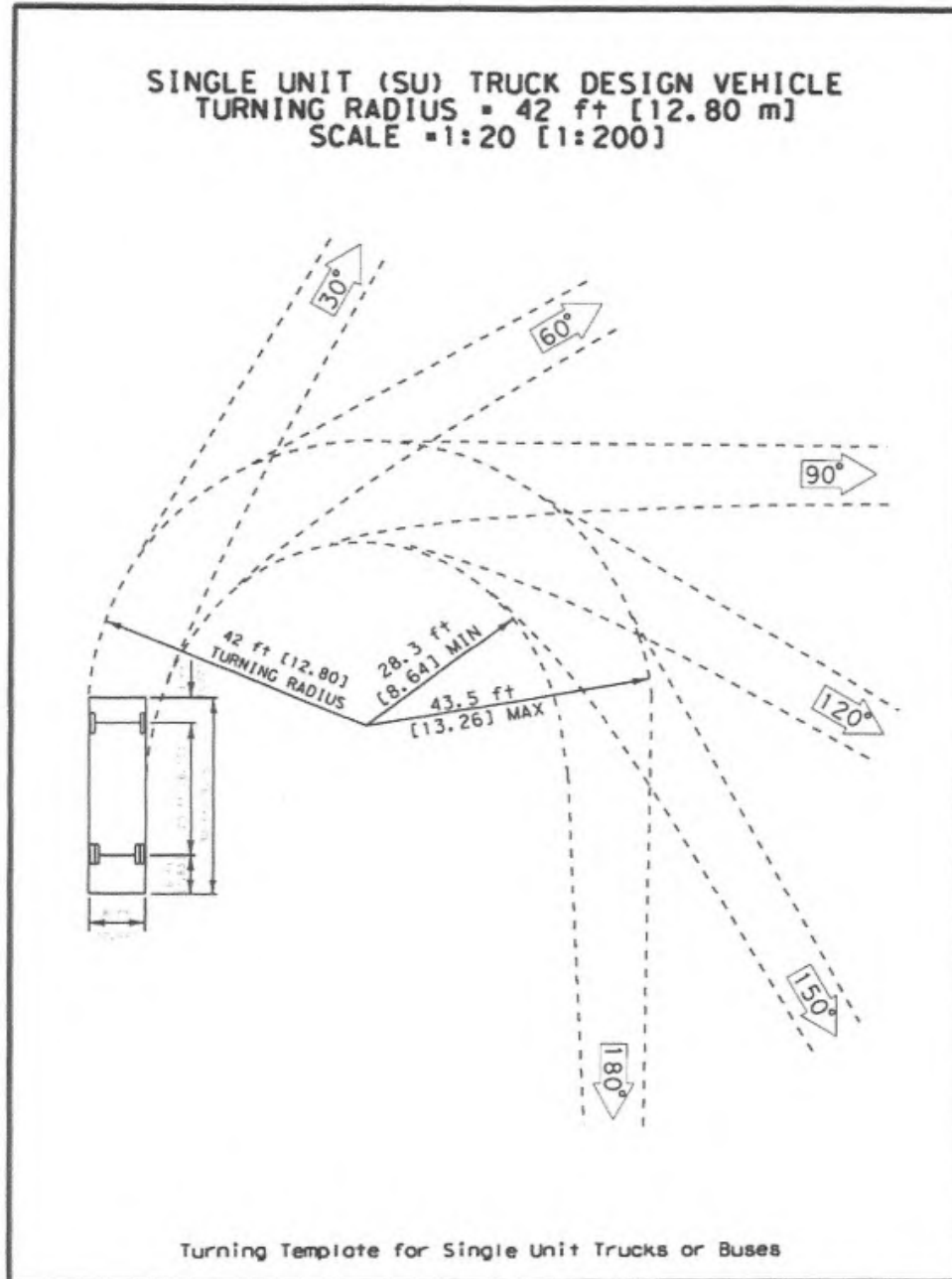


Exhibit 15

**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.

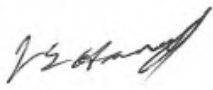
Section 17. TRUCK ROUTES

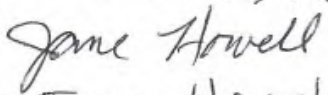
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

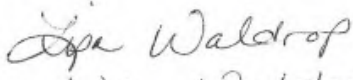
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

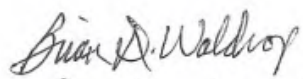
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

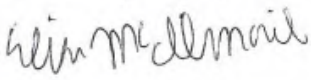
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

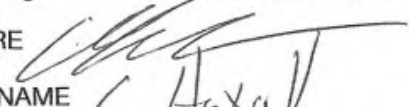

Jessie Huxell
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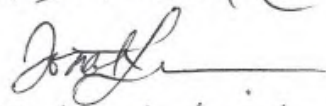

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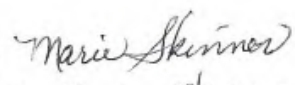

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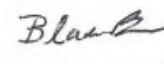

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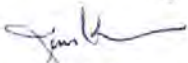
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EMAIL

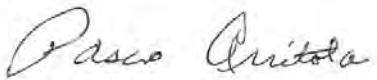

Blake Bars
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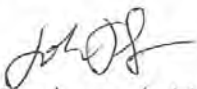
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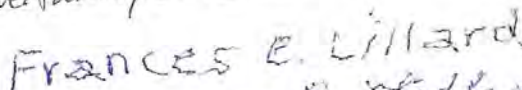
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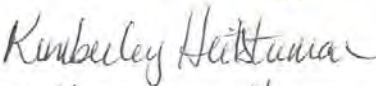
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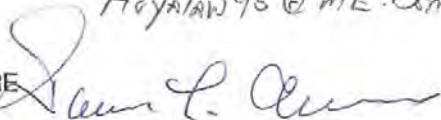
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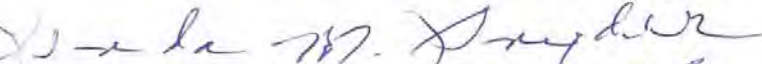
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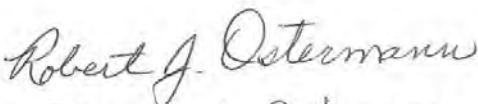
SIGNATURE 
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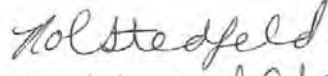
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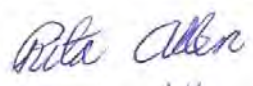
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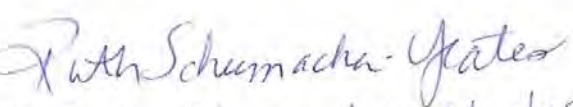
SIGNATURE 
PRINTED NAME Robin J. Ostermann
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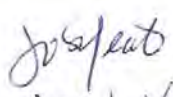
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SIGNATURE 
PRINTED NAME Jonathan D. White
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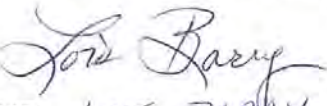
SIGNATURE 
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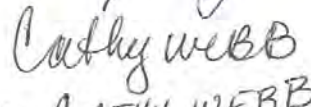
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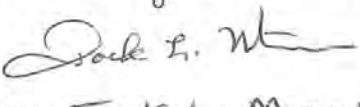
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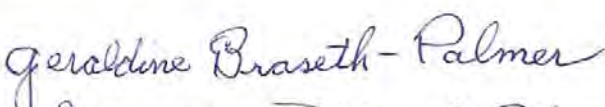

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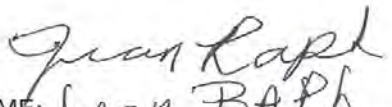
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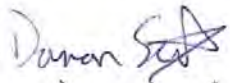
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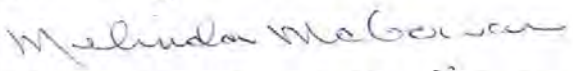
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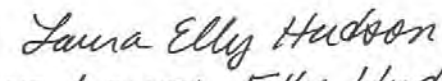
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EMAIL ellyhudson@gmail.com

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@eou.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR
EMAIL joehorst@eoni.com

SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
ADDRESS 91 - W. Hawthorne Dr. La Grande, OR 97850
EMAIL asherer@frontier.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, 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

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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
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EMAIL

TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.


In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰ These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable.¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

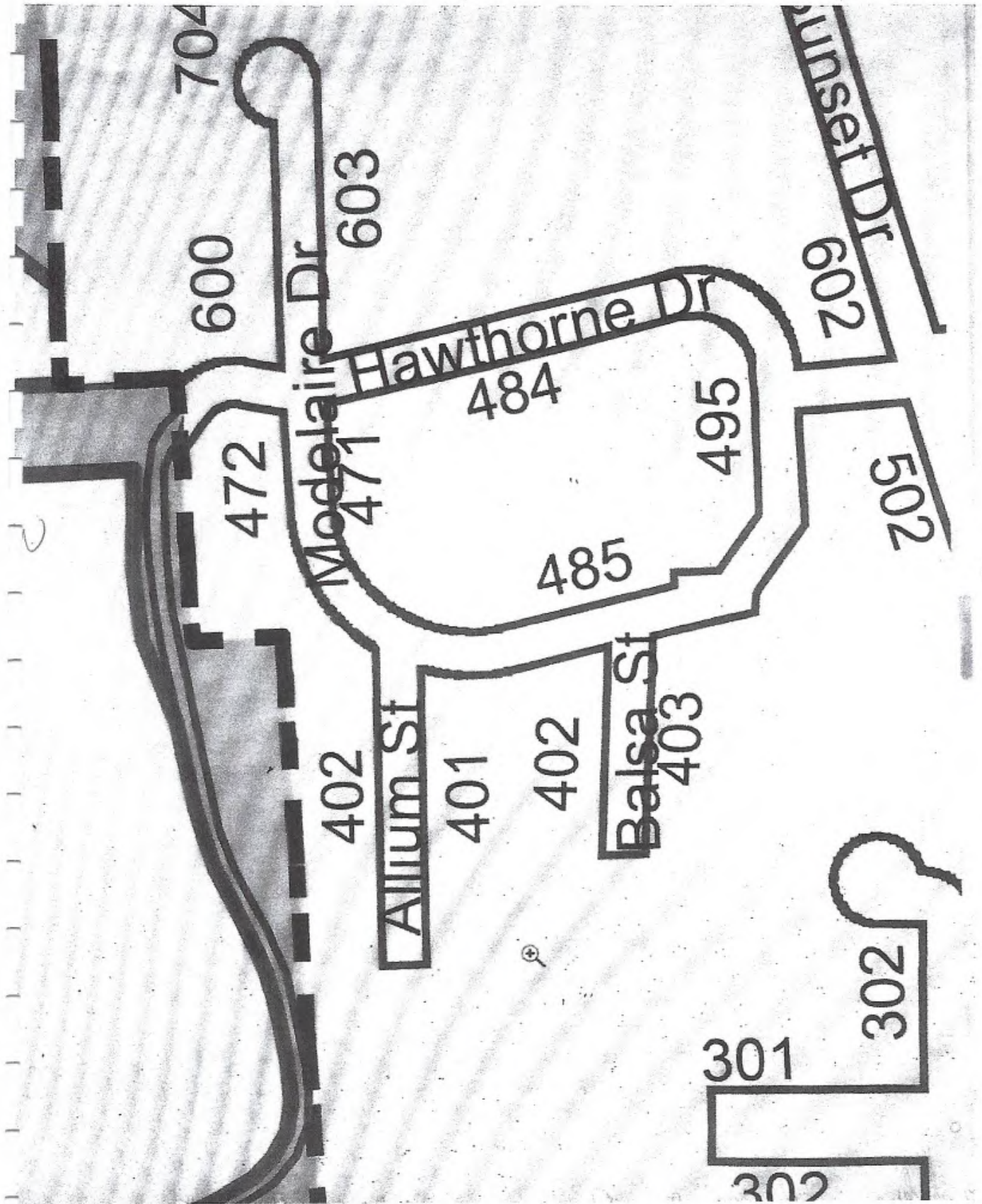
Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1



N

2

15

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.

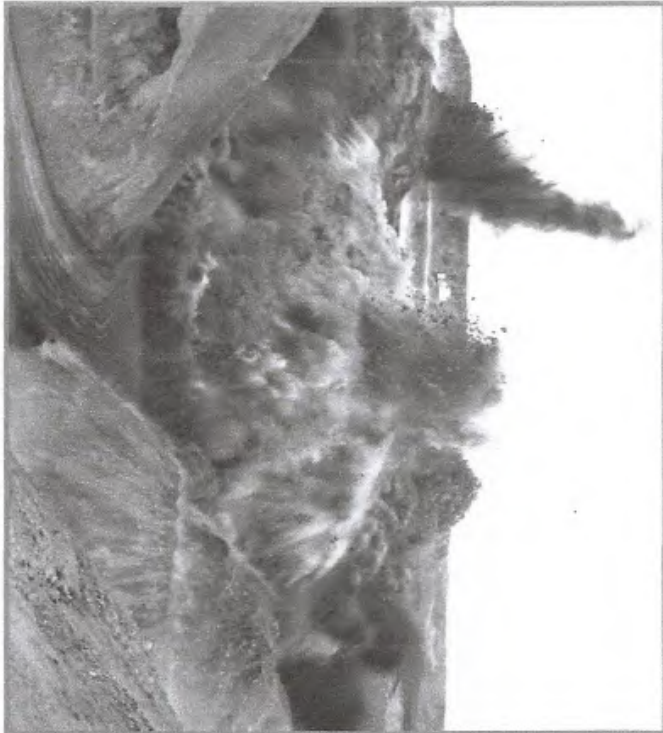
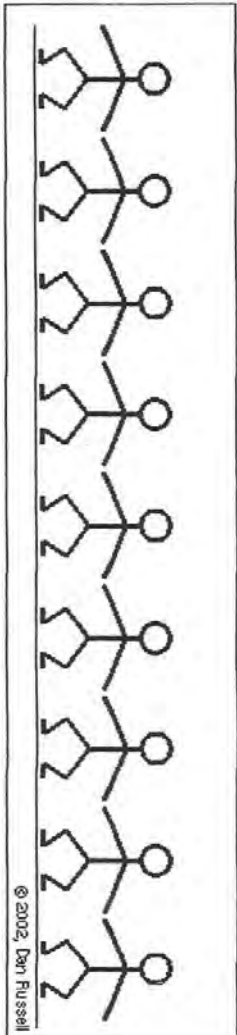


Exhibit 56

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.

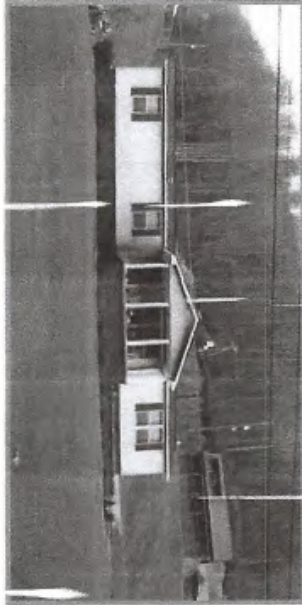
Flyrock is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.



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

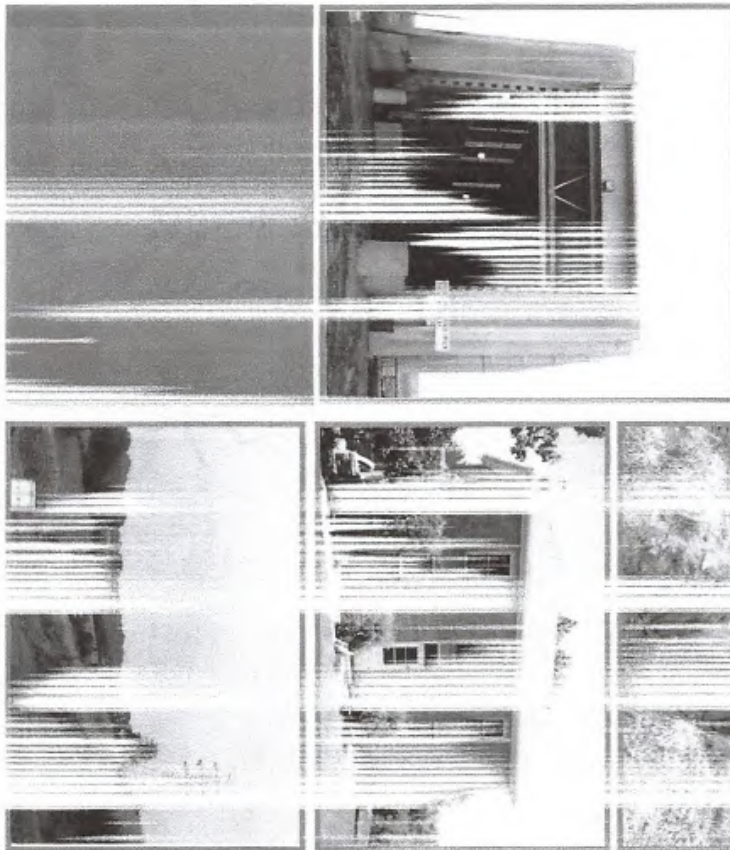
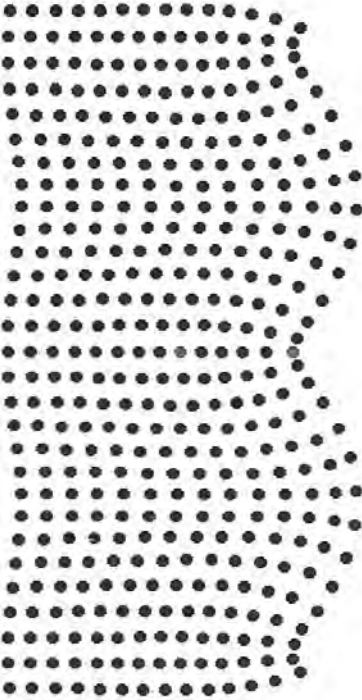


Exhibit 5D

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

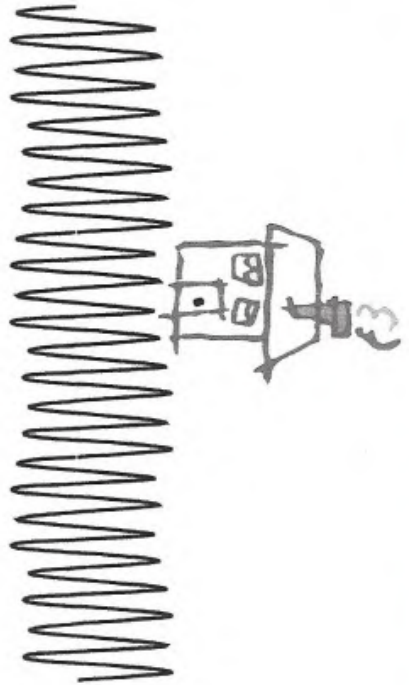
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

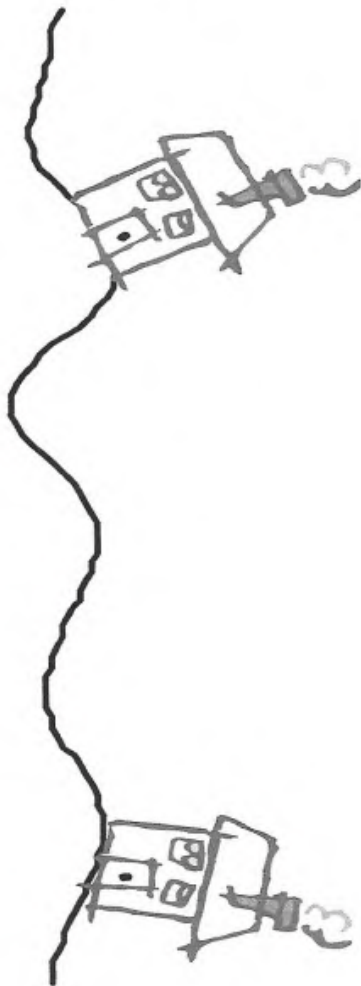


Ground Vibration Structure Response

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



Harvard Health Publishing
HARVARD MEDICAL SCHOOL

Trusted advice for a healthier life

A noisy problem - Harvard Health

Exhibit 16
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What can we help you find?



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HEALTHY

CANCER

DISEASES &
CONDITIONS

MEN'S
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



(<https://medcenterblog.uvmhealth.org/>)

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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Nursing Career Development

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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

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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.

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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,

8/4/2011

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
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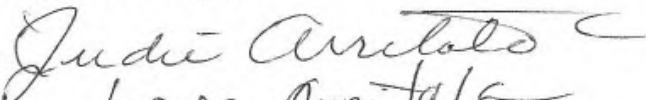


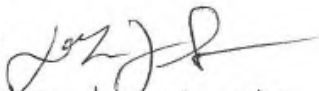
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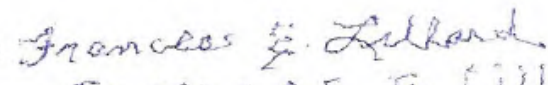
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I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

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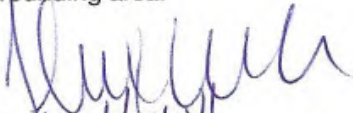
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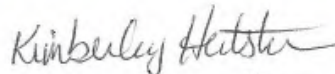
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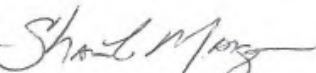
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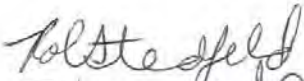
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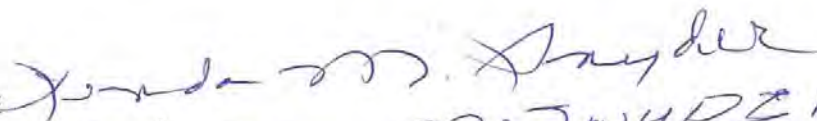
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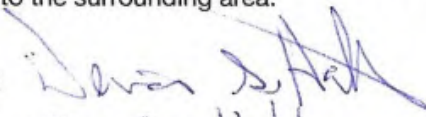
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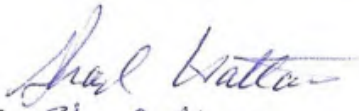
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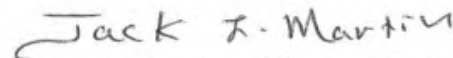
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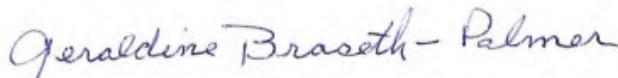
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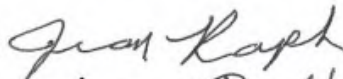
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ADDRESS 605 F Ave, La Grande OR 97850
EMAIL KeithDhudson@gmail.com

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
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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. Cavinato*
PRINTED NAME Anne G. Cavinato
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EMAIL acavinot@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR. 97850
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
ADDRESS 401 Cedar St., La Grande
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
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EMAIL hnull@eonl.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

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

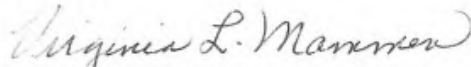
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

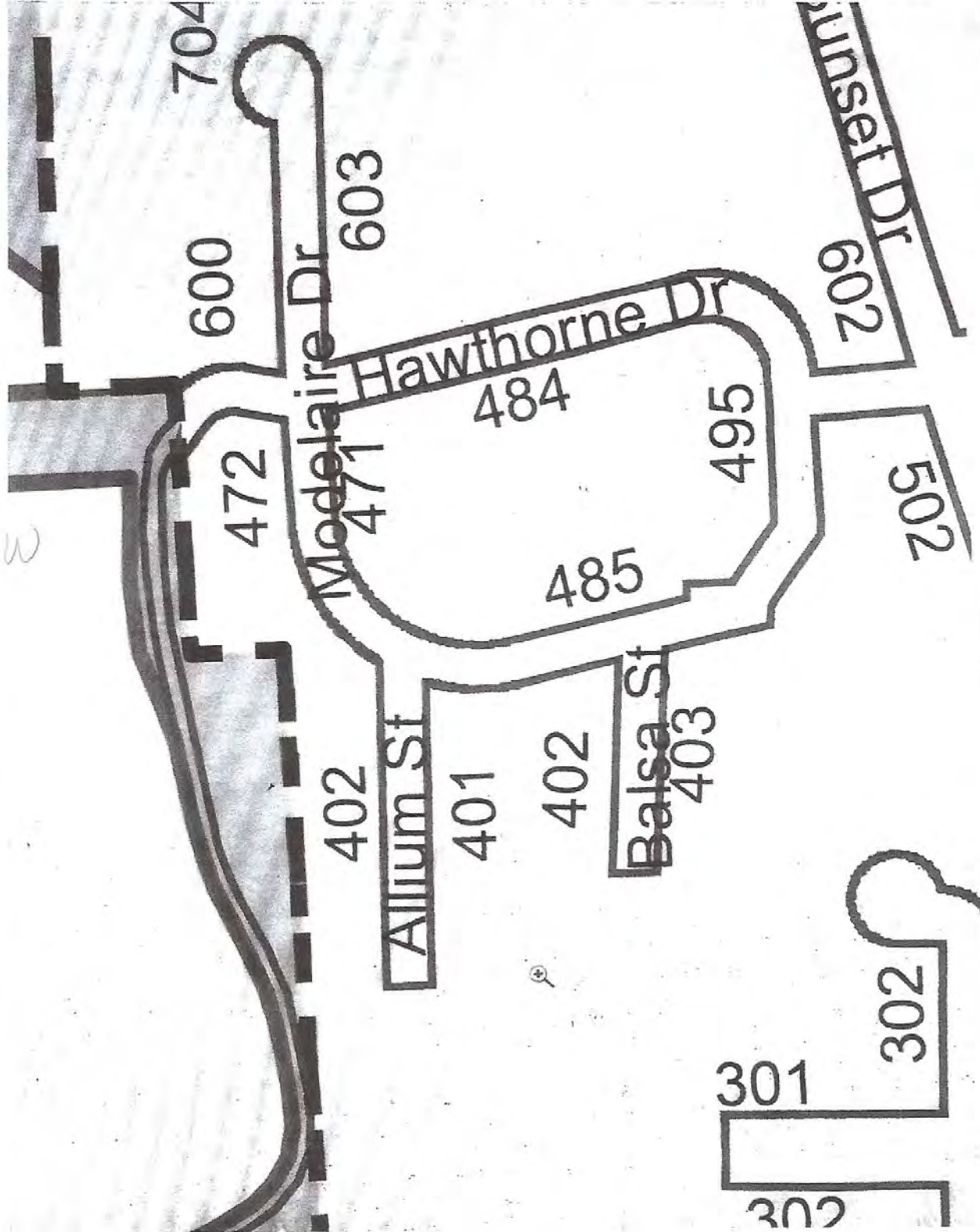


Exhibit 3

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

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



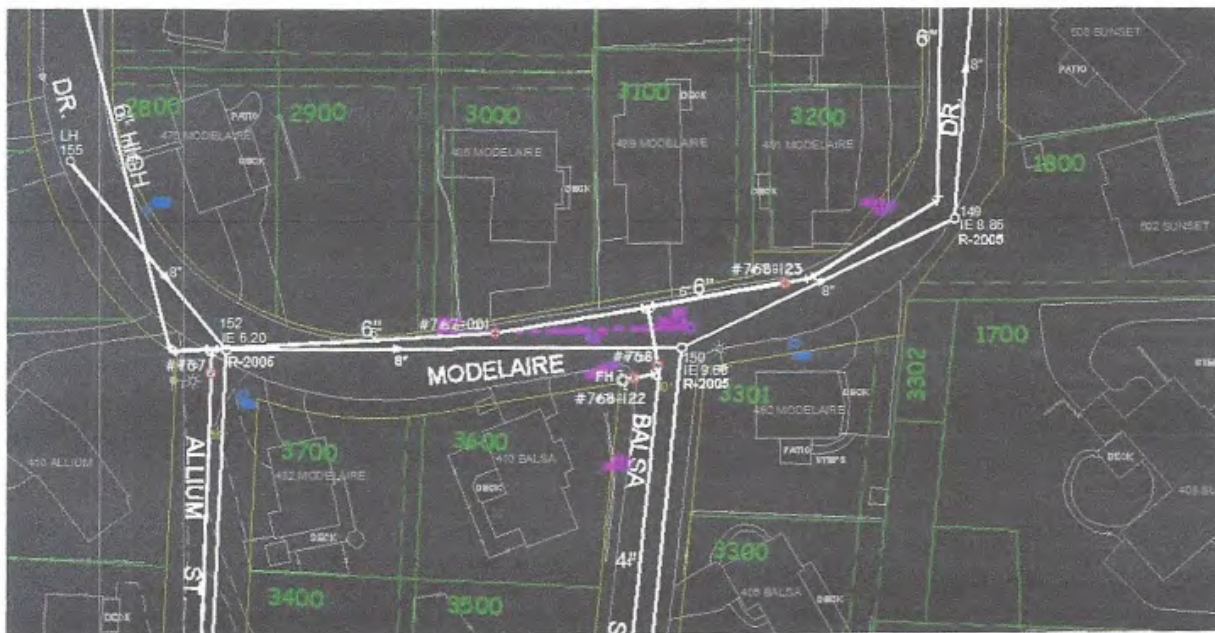
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

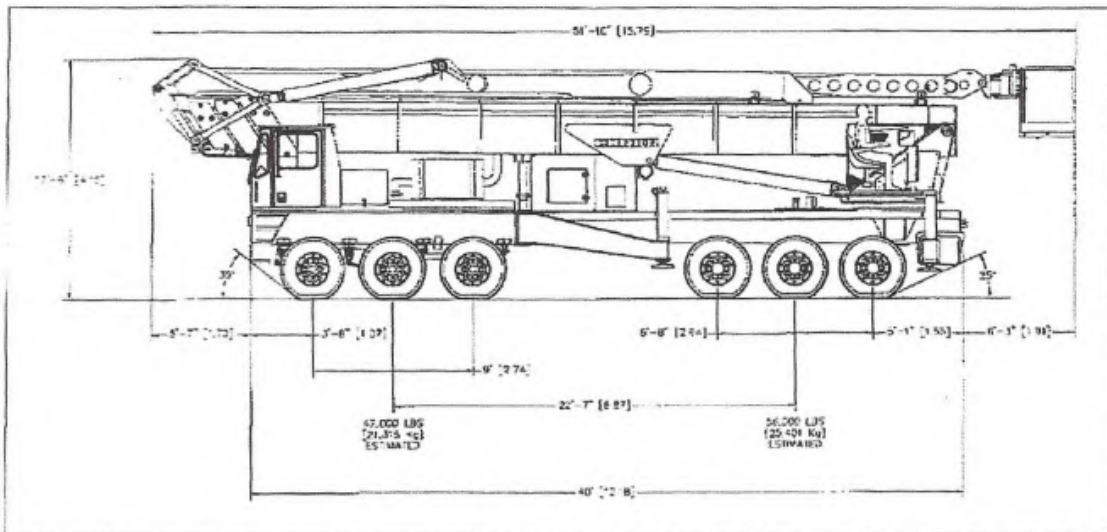


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

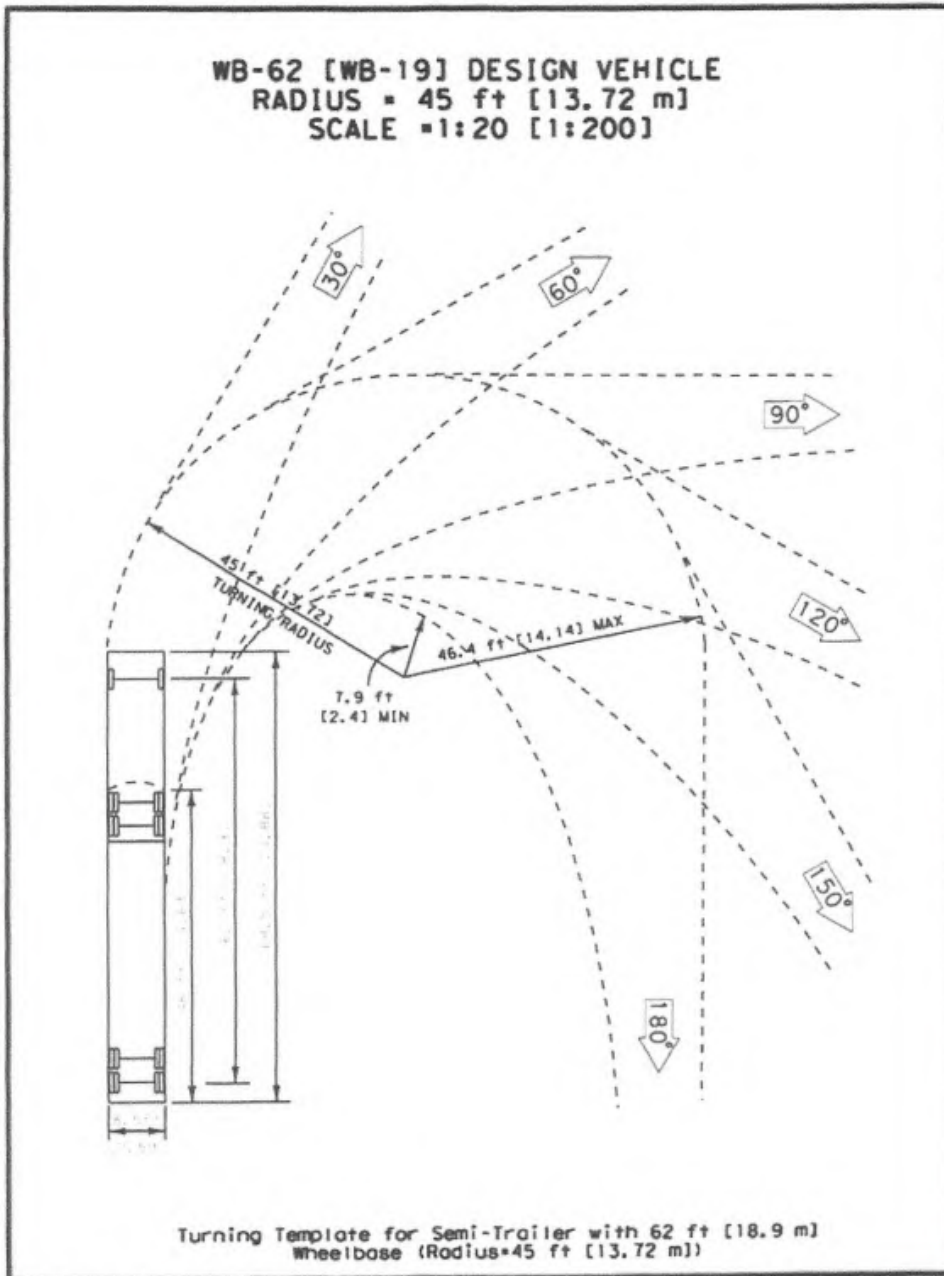


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

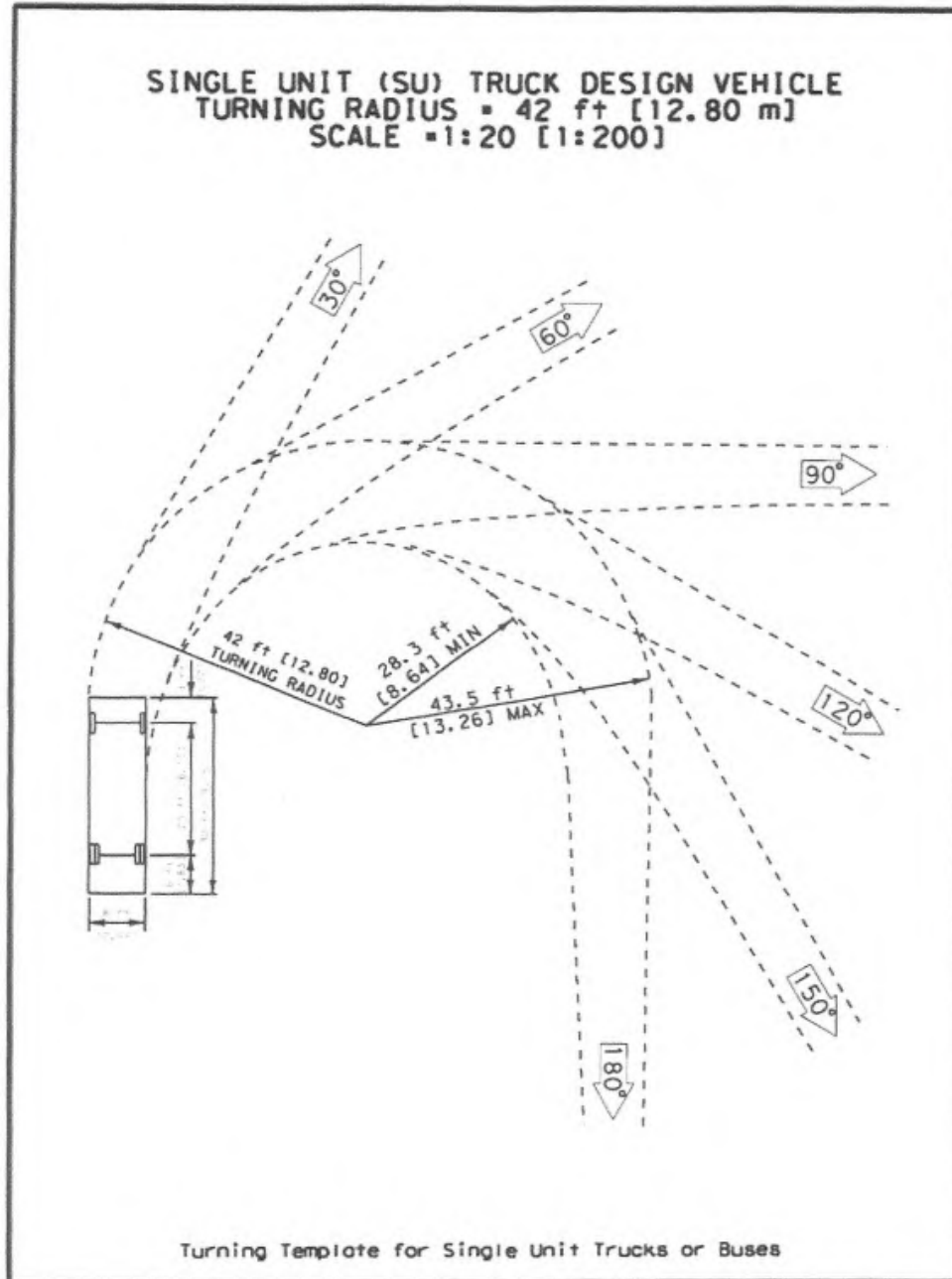


Exhibit 15

**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.

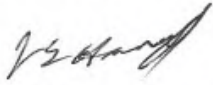
Section 17. TRUCK ROUTES

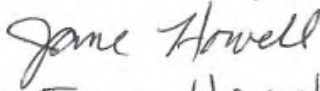
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

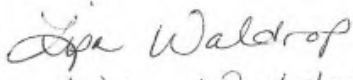
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

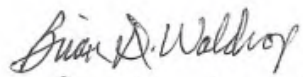
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

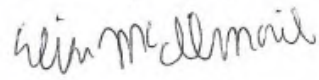
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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
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


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

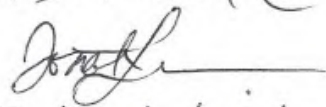

Chris Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

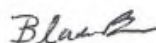

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE


PRINTED NAME

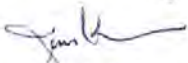
ADDRESS


EMAIL

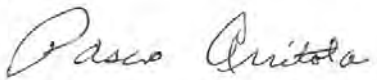

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

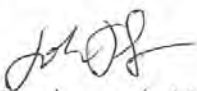
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@conr.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

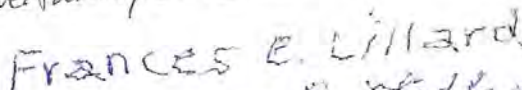
SIGNATURE 
PRINTED NAME Judie Arritola
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SIGNATURE 
PRINTED NAME Pasco Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL PSTOLA@CHARTER.NET


SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

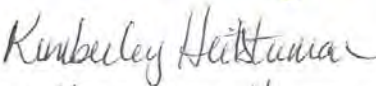
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, LA Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

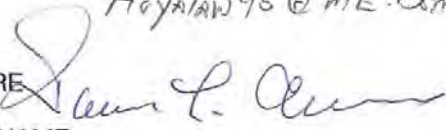
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

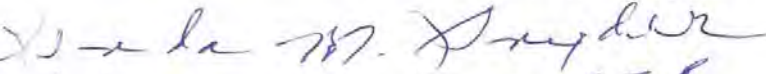
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

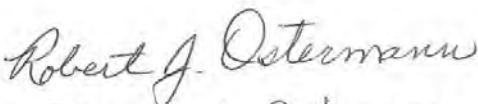
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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 Hoyakaw95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

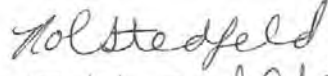
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

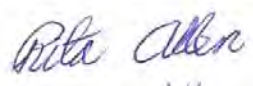
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

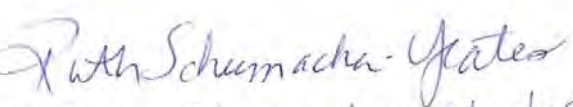
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

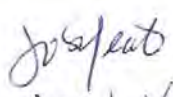
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

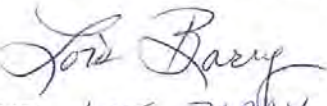
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

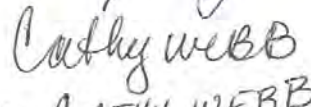
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

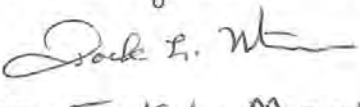
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

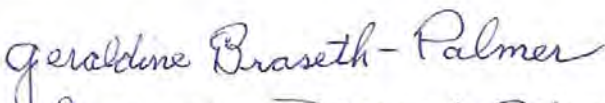

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

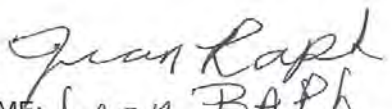
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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

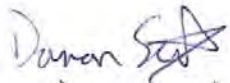
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

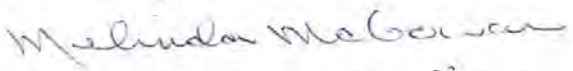
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
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EMAIL Jraph19@gmail.com

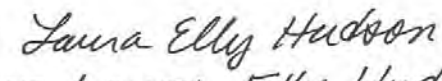
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
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SIGNATURE 
PRINTED NAME Cory Sexton
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EMAIL Corytris@gmail.com

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
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SIGNATURE *Anne G. Cavinato*
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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
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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
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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 5:53 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

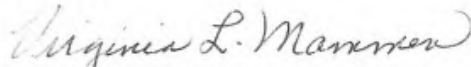
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

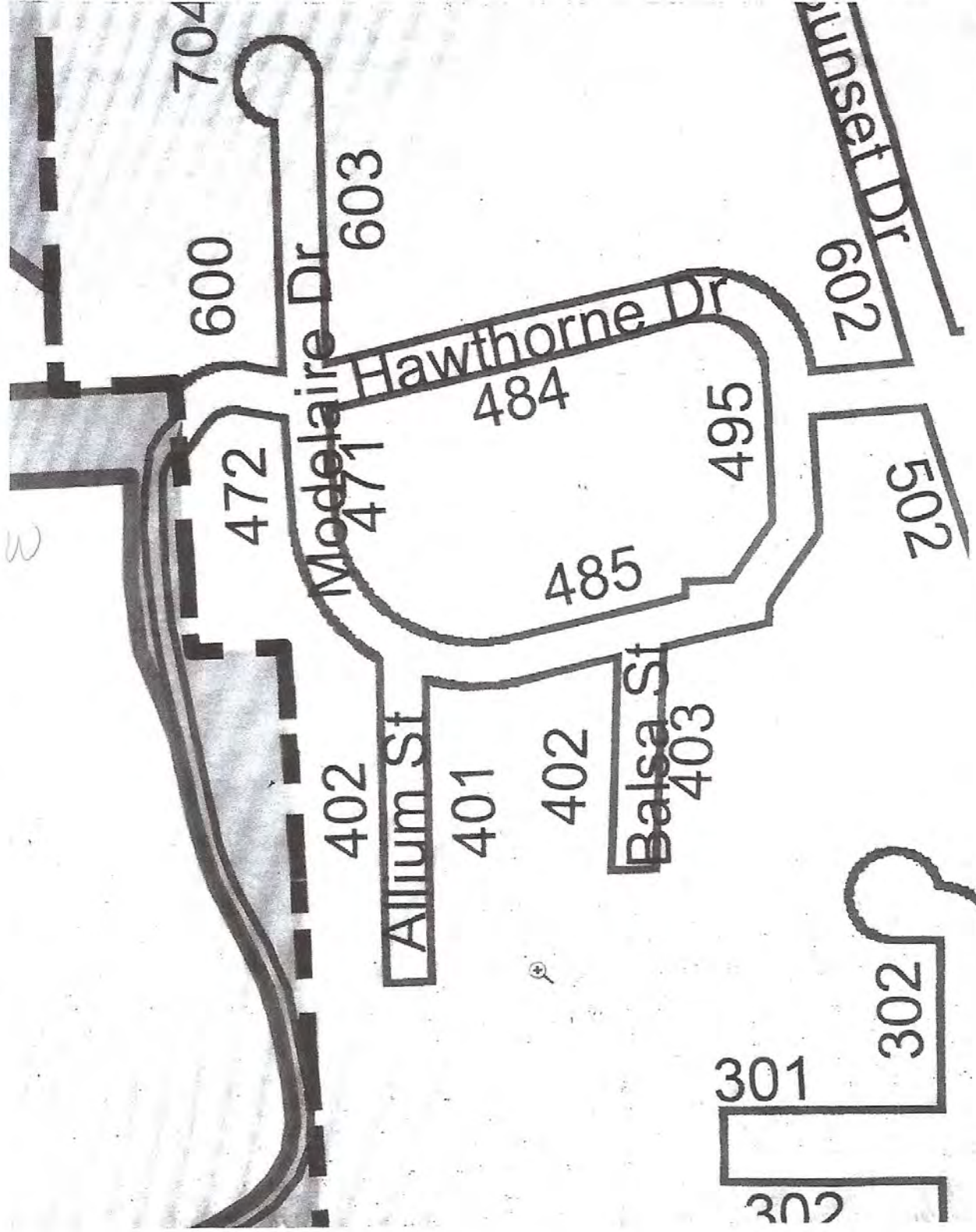


Exhibit 3

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

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 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

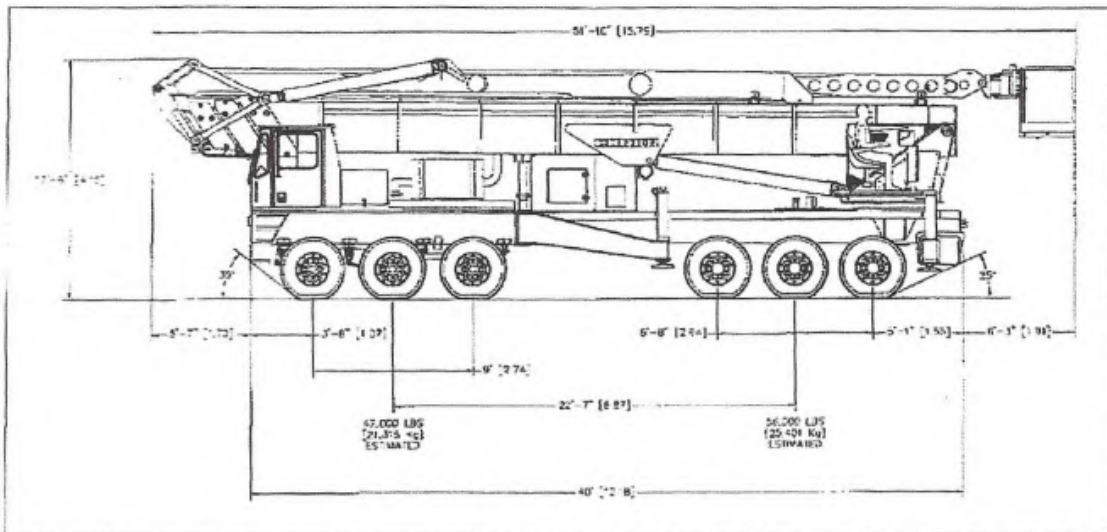


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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
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

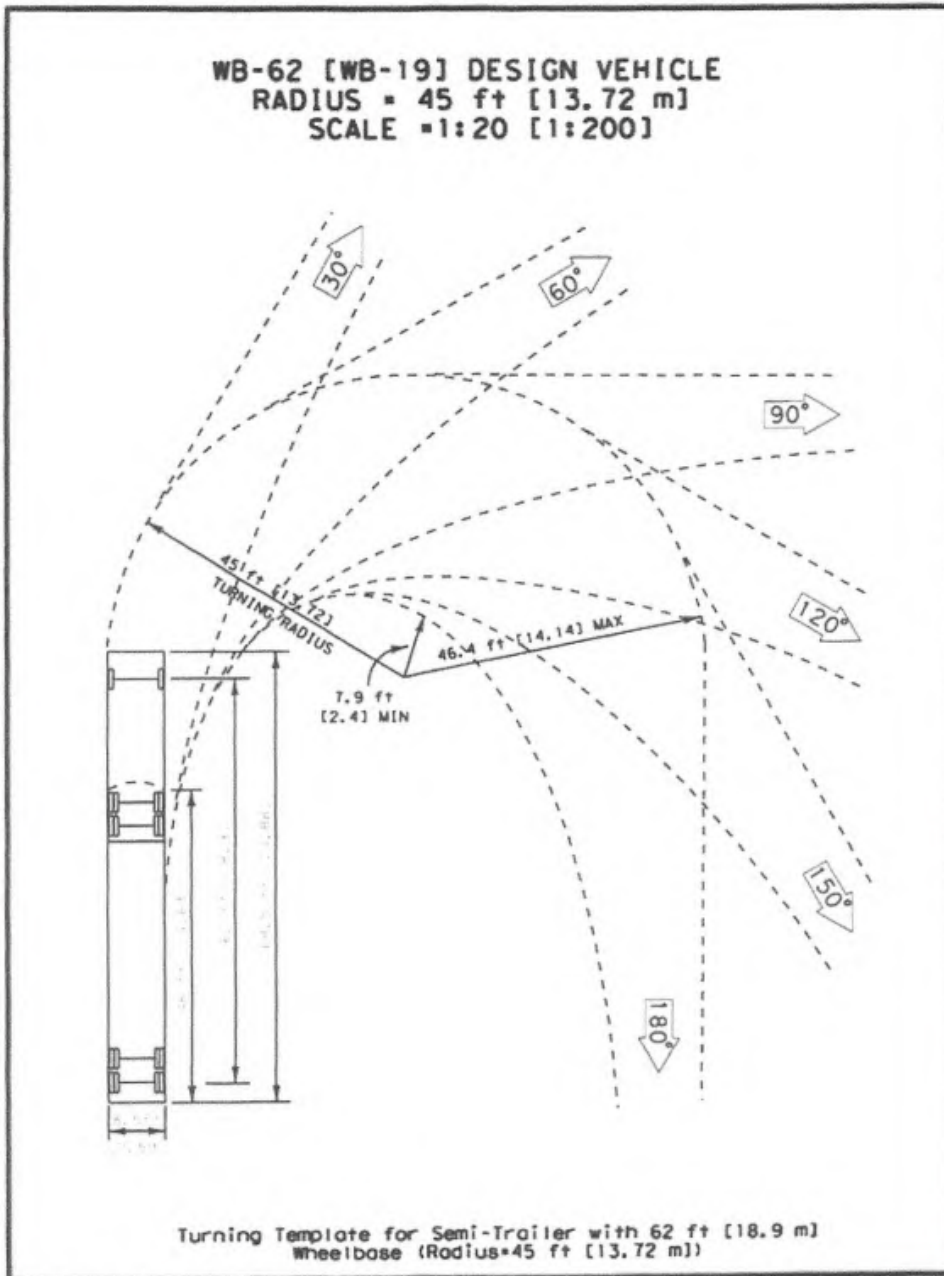


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

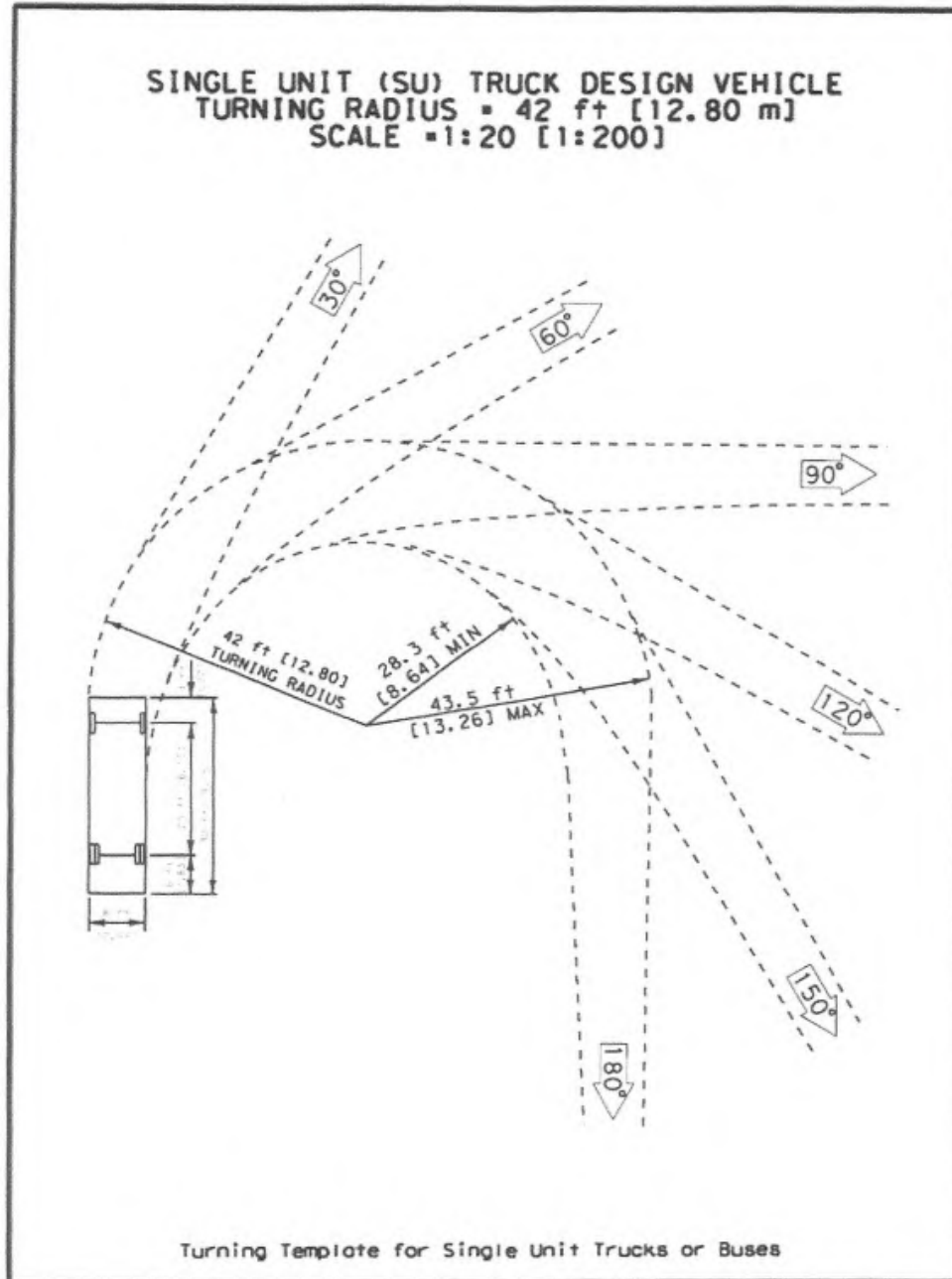


Exhibit 15

**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.

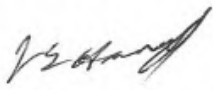
Section 17. TRUCK ROUTES

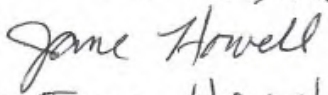
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

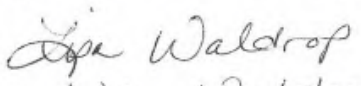
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

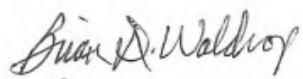
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

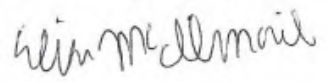
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SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

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 mcilmail154@hotmail.com


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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL



Jessie Huxell
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jessiehuxell@live.com

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

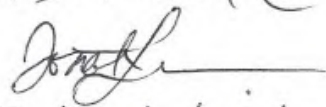

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SIGNATURE

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Jonah Lindeman
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SIGNATURE

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Marie Skinner
Marie Skinner
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marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

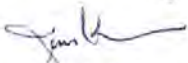
ADDRESS


EMAIL

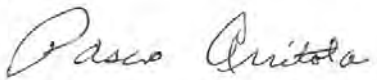
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

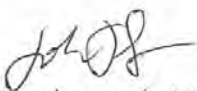
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SIGNATURE 
PRINTED NAME Dale Mammen
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EMAIL dmammen@conr.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

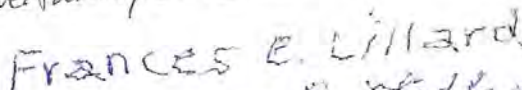
SIGNATURE 
PRINTED NAME Judie Arritola
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EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
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SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

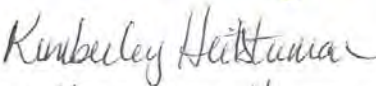
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

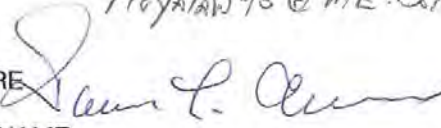
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

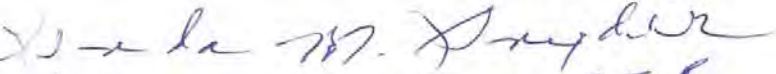
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

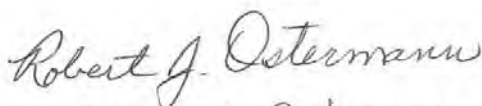
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2409 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME Lonnie L. Allen
ADDRESS 410 BALSA STREET LAGRANDIE, OREGON 97858
EMAIL N/A

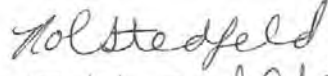
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 MODELAIRE
EMAIL

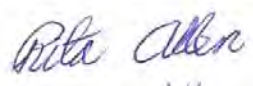
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

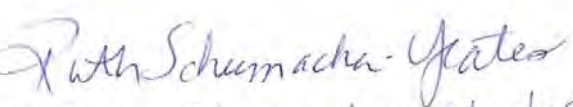
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

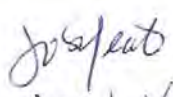
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

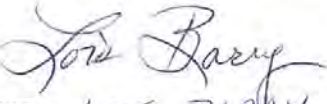
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaire Dr. La Grande
EMAIL rstedfeld@yahoo.com

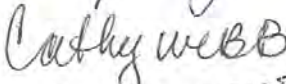
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

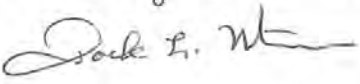
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

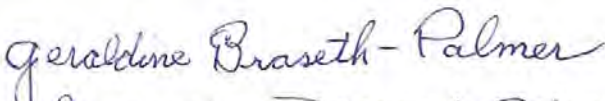

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

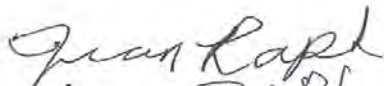
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SIGNATURE 
PRINTED NAME Lois BARRY
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EMAIL loisbarry31@gmail.com

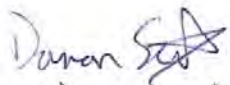
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
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EMAIL Buff Martin 27 @GMail .com

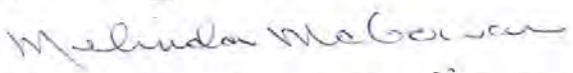
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
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EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
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EMAIL Jraph19@gmail.com

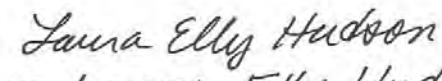
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SIGNATURE 
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SIGNATURE 
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SIGNATURE 
PRINTED NAME Laura Elly Hudson
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EMAIL ellyhudson@gmail.com

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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
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SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
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EMAIL asherer@frontier.com

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SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
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SIGNATURE *Heather M. Null*
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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*
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SIGNATURE *Robin L. Maille*
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SIGNATURE *Bruce C Kevan*
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SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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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.

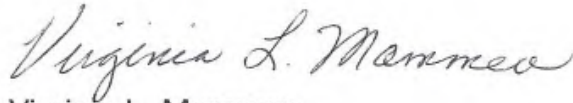
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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.

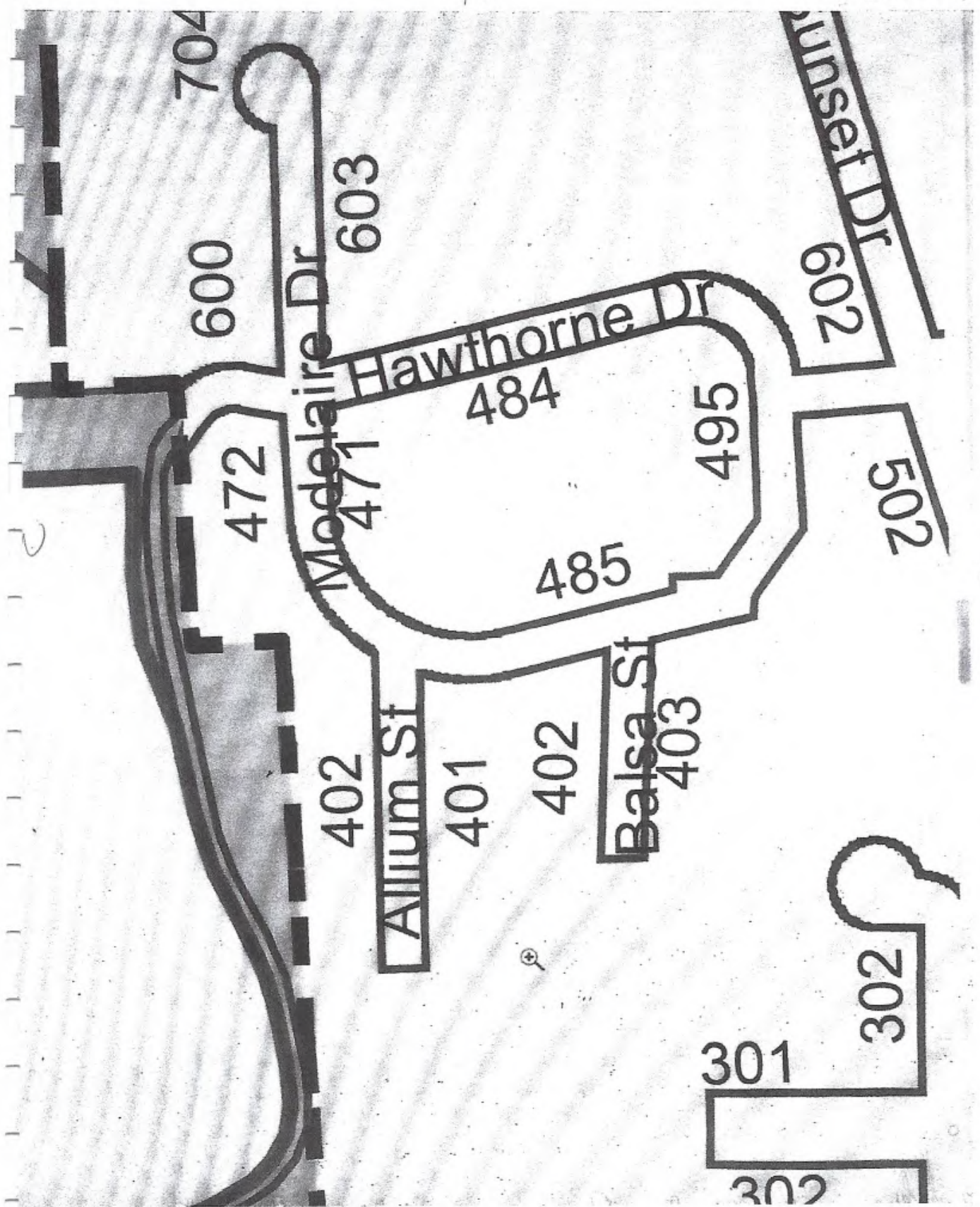
Sincerely,



Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1



N

2

11

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.



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.

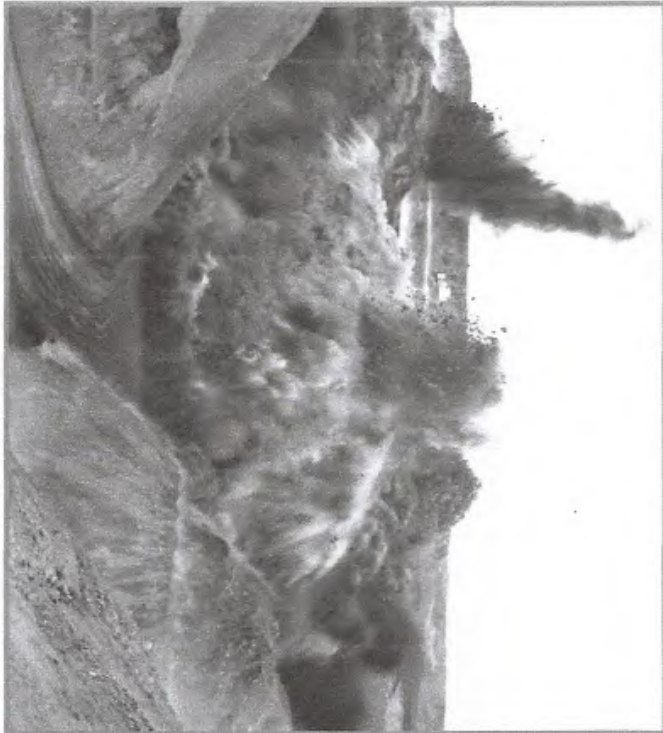
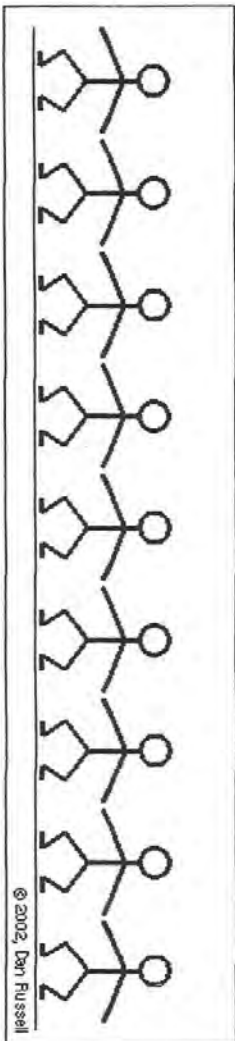


Exhibit 5b

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.

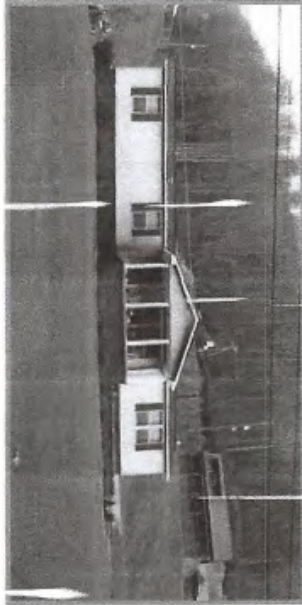
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

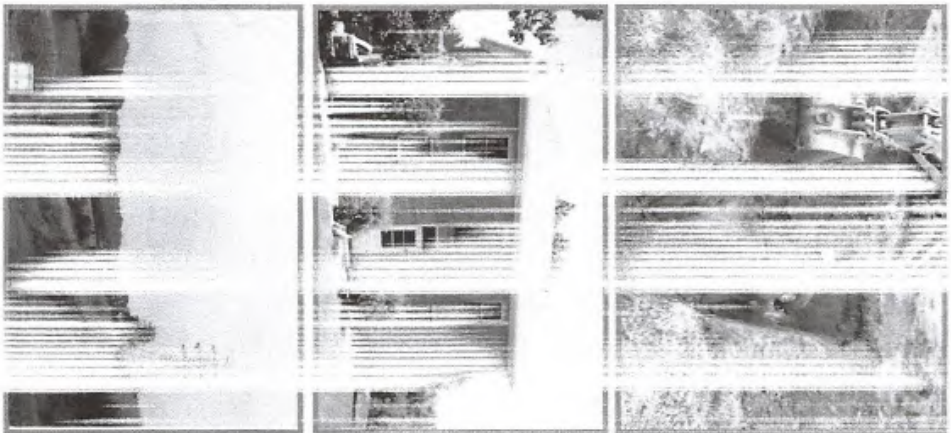
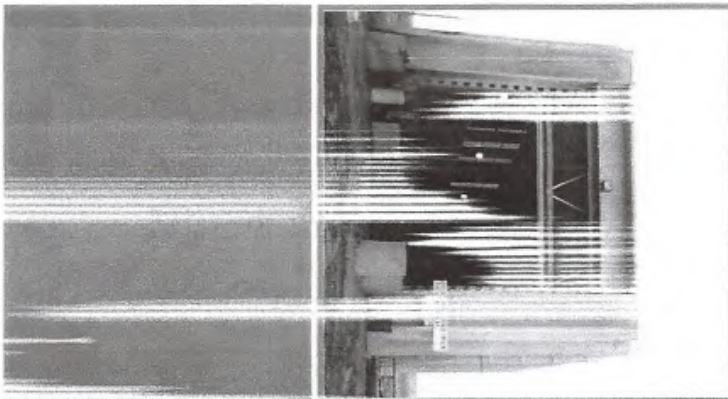
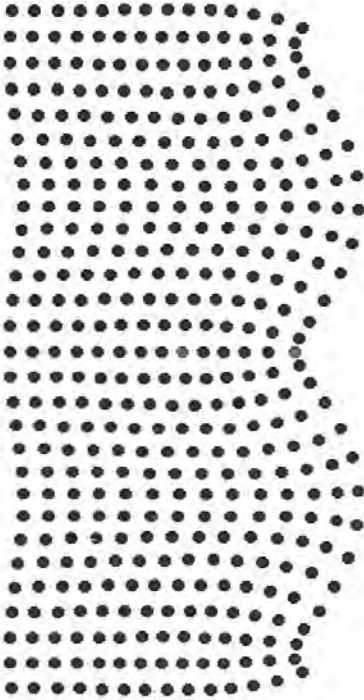


Exhibit 5D

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.



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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.

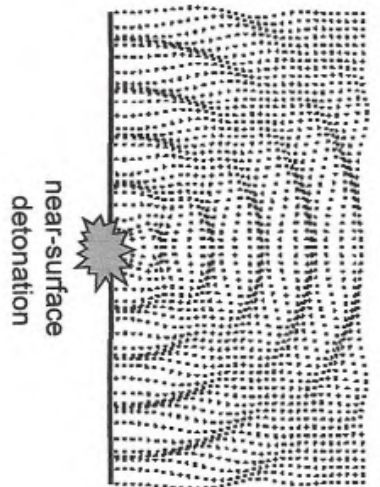
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

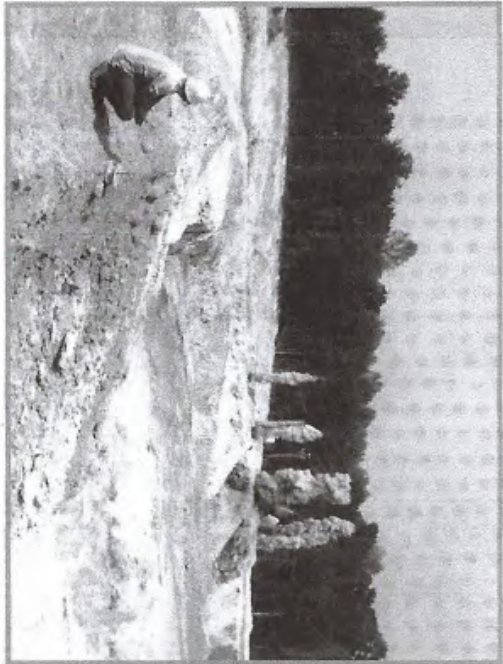
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

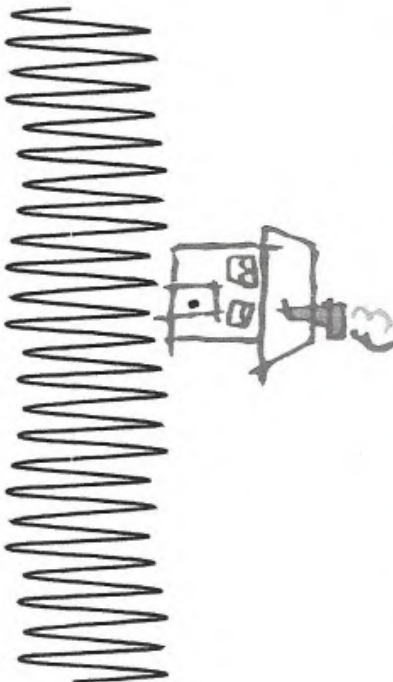
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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



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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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Nursing Career Development

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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

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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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Exhibit 10a



Front Psychol. 2013; 4: 578.

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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](#)

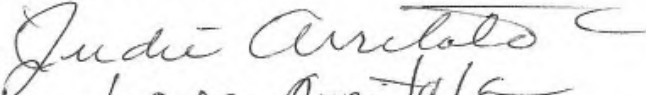


SCIENCE
NEWS


EXPERT
OPINION

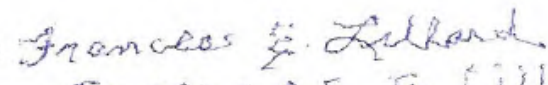
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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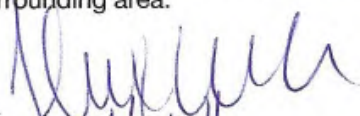
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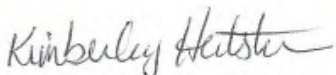
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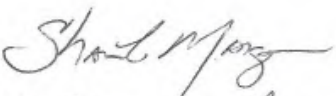
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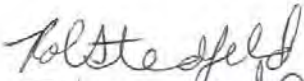
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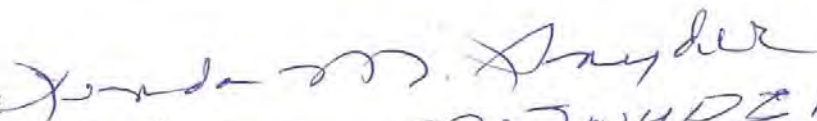
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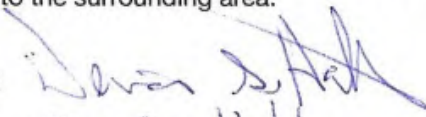
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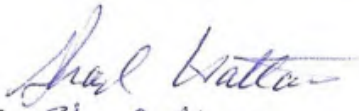
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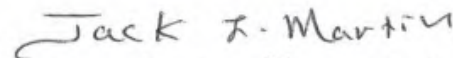
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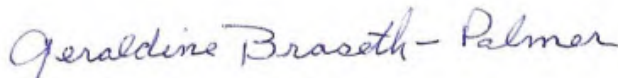
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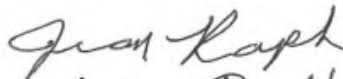
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PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 6/20/9 Location: Arroyo La Grande
REGISTRATION FOR PUBLIC COMMENT

Name: Diana Siltanen (R.N.)

Address: 1901 Foley St

I represent (if applicable) I work for OHSU School of Nursing & Grande
Print your name OR your organization/business name.

Send me future notifications about Council meetings via email. Zone Hospital
My email address is: siltanenc@ohsu.edu

I wish to address the Energy Facility Siting Council and/or

I wish to submit the following written comment:

My primary concern is fire. Of course visual impact is noted, but more than the sight of power is the memory of the sight of those fleeing the Paradise fire in California. I can not even bring myself to really think of the terror experienced by the people fleeing the fire those trapped with their children perished by the flames. How dare someone/company put my four children at such horrific risk. There are alternatives. I believe this selfish endeavor is nothing short of evil. Diana Siltanen

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.

PLEASE RETURN THIS FORM TO THE COUNCIL ASSISTANT
*See reverse for tips on giving testimony

ENERGY FACILITY SITING COUNCIL (EFSC)
Date: 8/20/19 Location: LaGrande OR
REGISTRATION FOR PUBLIC COMMENT

Name: Randy Siltanen

Address: 1901 Foley St LaGrande OR 97850

I represent (if applicable) _____
Print your name OR your organization/business name.

Send me future notifications about Council meetings via email.
My email address is: _____

I wish to address the Energy Facility Siting Council and/or
 I wish to submit the following written comment:

- Is there just cause to build these power transmission lines?
The answer is no!

- The downsides are well documented: wildfire risk, watershed issues, disruption of ecosystems, deforestation (with attendant ↓ in CO₂ sequestration).

- For what just cause? Are there no other alternatives?
There are is no just cause because there are many alternatives! Solar

& wind energy options have achieved grid parity & are getting cheaper. If there was no other way to provide necessary electricity to a hospital it would

PLEASE NOTE: If there are a large number of speakers, it may be necessary to limit the amount of time each speaker is allowed.
be understandable. But there are options available, and the electricity is often used for air-conditioning & powering big screen TV's. ^{providing} Cheap electricity to an affluent area is not just cause to introduce so many problems.

Page 150

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

Page 151

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.

Page 152

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

Page 153

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

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

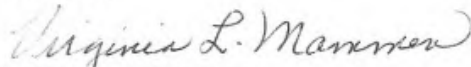
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

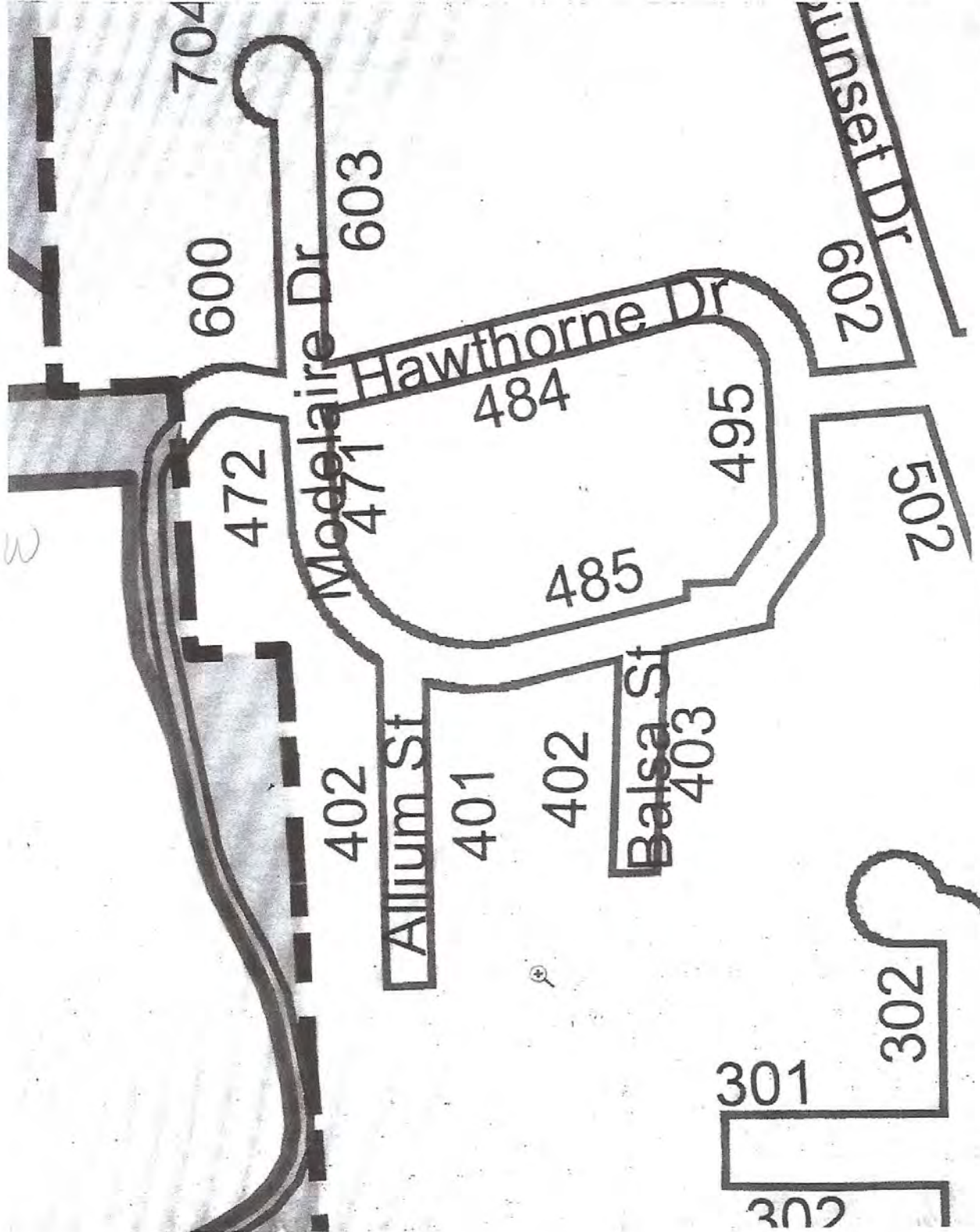


Exhibit 3

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 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

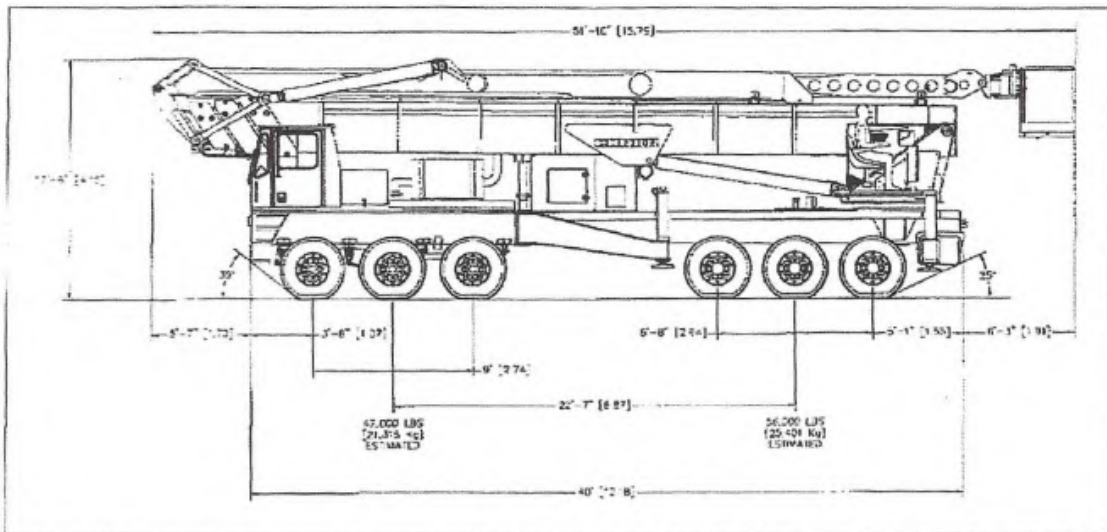


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

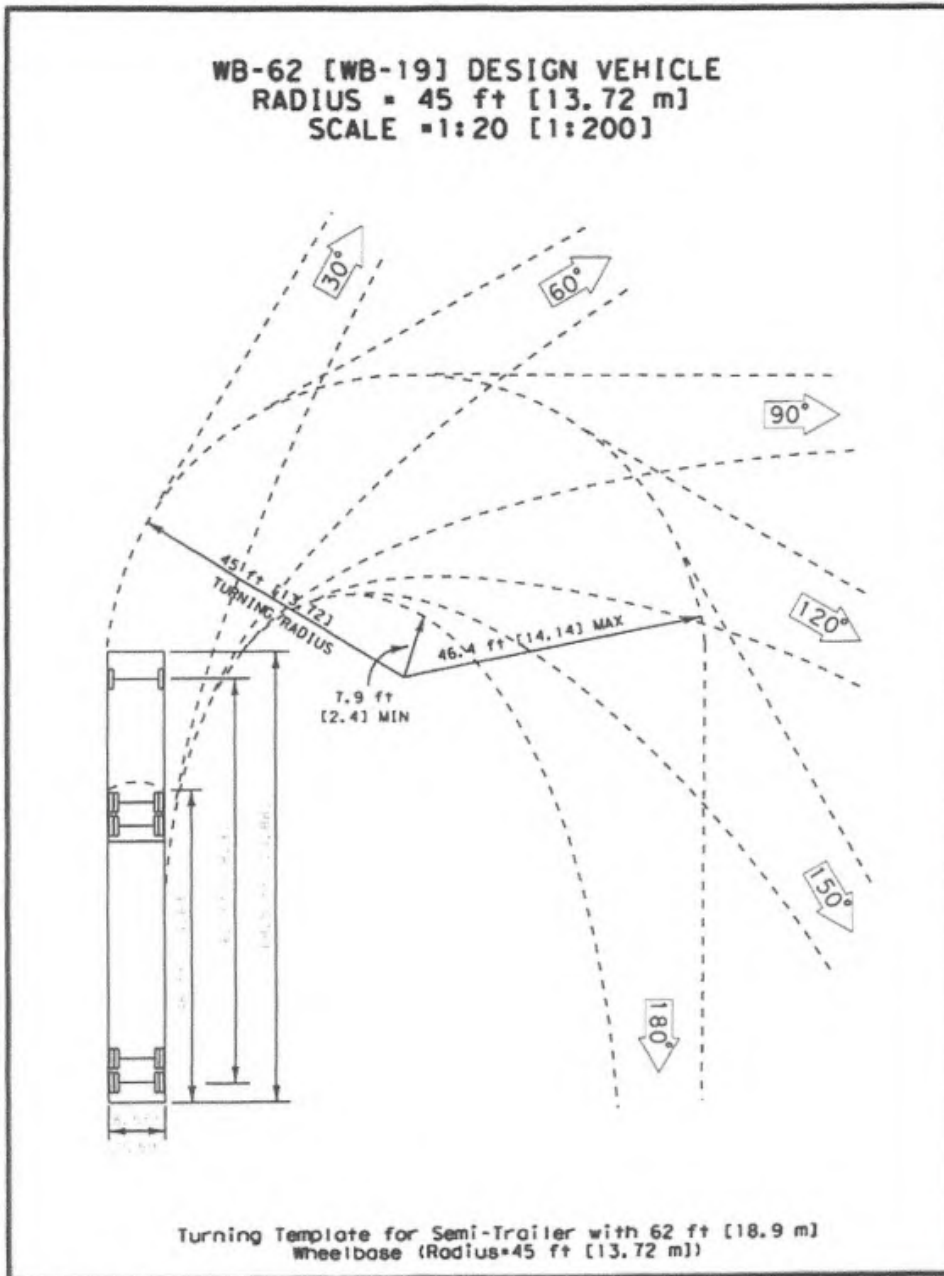


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

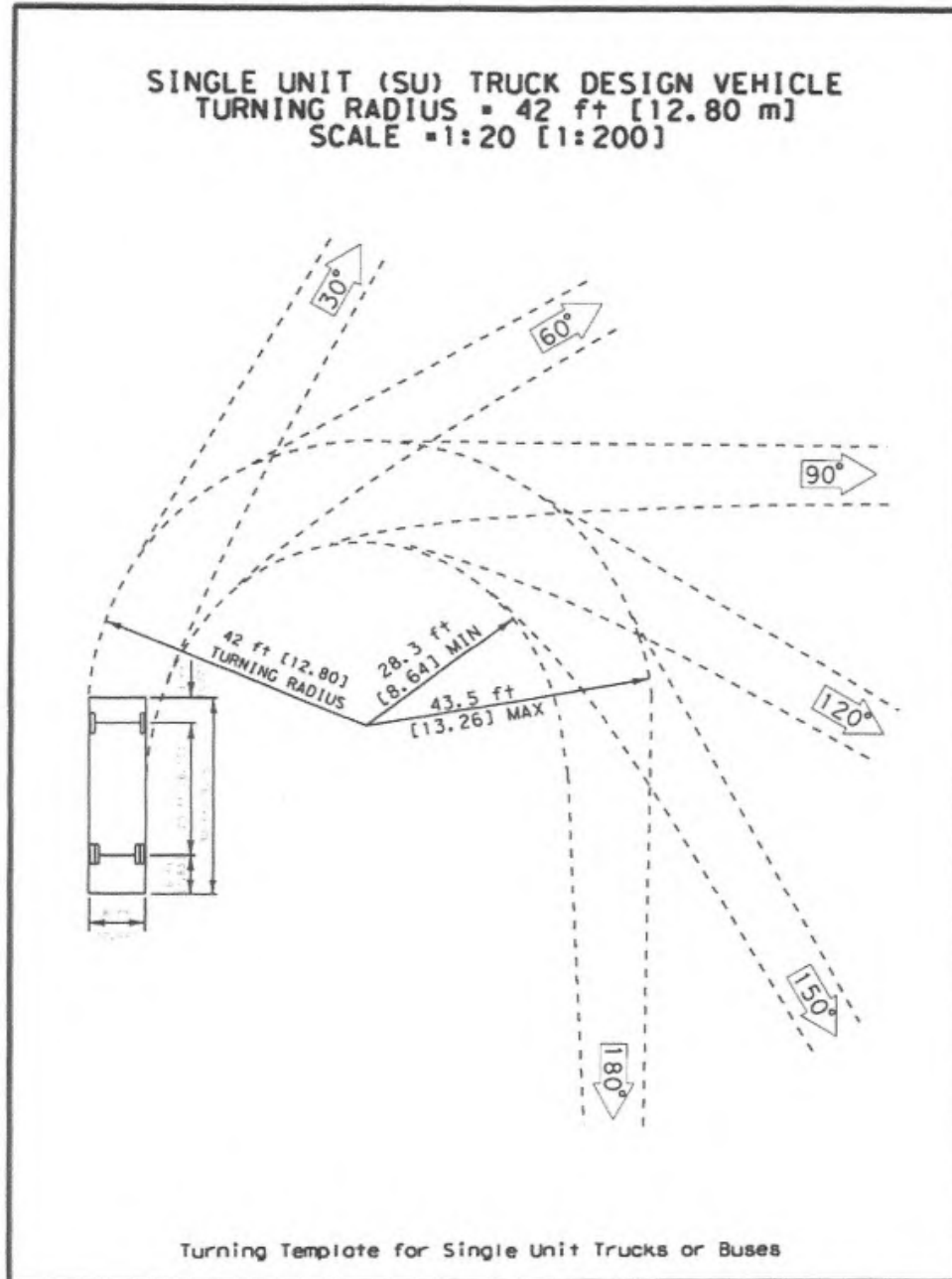


Exhibit 15

**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.

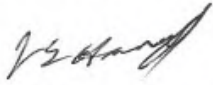
Section 17. TRUCK ROUTES

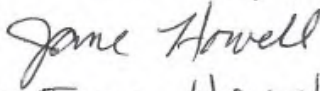
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

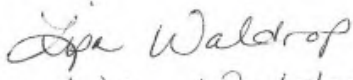
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

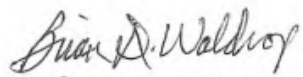
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

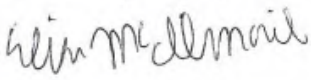
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SIGNATURE 
PRINTED NAME James E. Howell II
ADDRESS 482 Modelaire Dr
EMAIL j.howell2@frontier.com

SIGNATURE 
PRINTED NAME Jane Howell
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EMAIL d.janehowell@gmail.com

SIGNATURE 
PRINTED NAME Lisa Waldrop
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SIGNATURE 
PRINTED NAME BRIAN D. WALDROP
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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

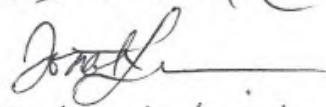

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

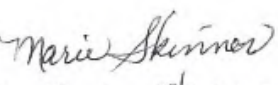

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

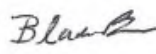

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

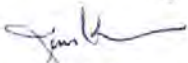
ADDRESS


EMAIL

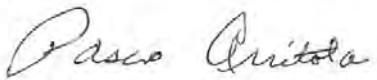

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

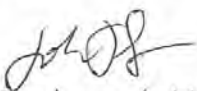
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SIGNATURE 
PRINTED NAME Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL dmammen@conr.com


SIGNATURE 
PRINTED NAME Jim Kreider
ADDRESS 6036 Marvin Rd
La Grande, OR 97850
EMAIL jkreider@campblackdog.org

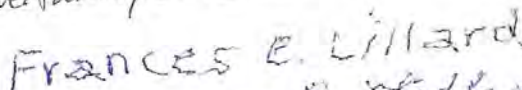
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande, OR
EMAIL jtol@charter.net


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

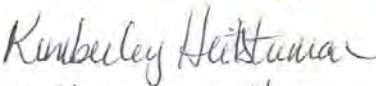
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

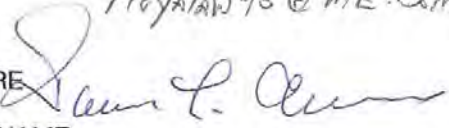
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

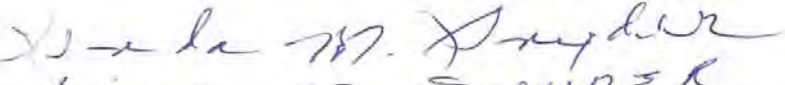
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

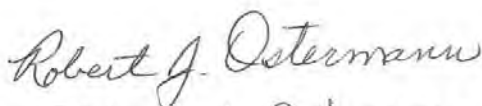
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com

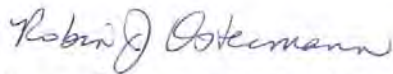
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SIGNATURE: 
PRINTED NAME Shawn K. Mangum
ADDRESS 2909 E. M. Ave,
EMAIL Hoyalan95@ME.com


SIGNATURE 
PRINTED NAME
ADDRESS Dennis L. ALLEN #41- 9637720
410 Balsa Street LaGrande, Oregon 97858
EMAIL N/A

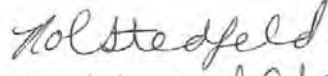
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

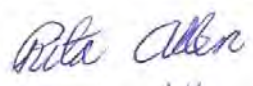
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

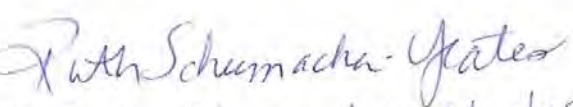
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

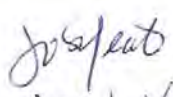
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

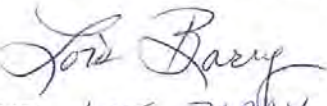
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

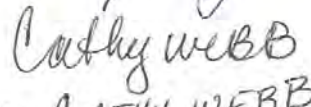
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

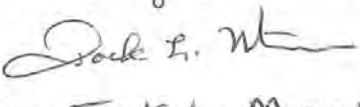
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

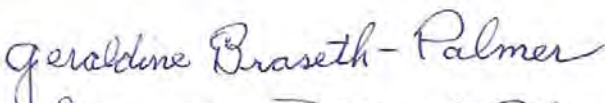

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com

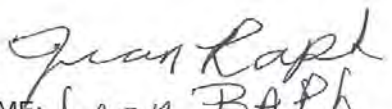
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SIGNATURE 
PRINTED NAME LOIS BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

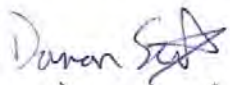
SIGNATURE 
PRINTED NAME CATHY WEBB
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EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

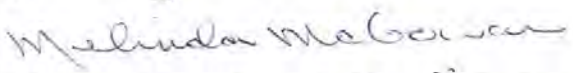
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 Goldenest Drive LA GRANDE, Ore 97850
EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jbaph19@gmail.com

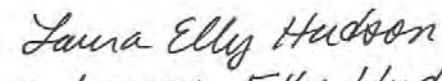
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
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SIGNATURE 
PRINTED NAME Cory Sexton
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SIGNATURE 
PRINTED NAME Melinda McGowan
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SIGNATURE 
PRINTED NAME Keith D. Hudson
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EMAIL Keithdhudson@gmail.com

SIGNATURE 
PRINTED NAME Laura Elly Hudson
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EMAIL ellyhudson@gmail.com

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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL rlvwd1910@gmail.com

SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
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SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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EMAIL joehorst@ecni.com

SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
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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
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SIGNATURE *Bert R. Frewing*
PRINTED NAME 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
ADDRESS 2009 SCORPIO DRIVE LA GRANDE OR 97850
EMAIL MERLECOMFORT@GMAIL.COM

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
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SIGNATURE *Bruce C Kevan*
PRINTED NAME *Bruce C*
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SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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EMAIL carolsummers1935@gmail.com

SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 NTH St. LaGrande - OR 97850
EMAIL

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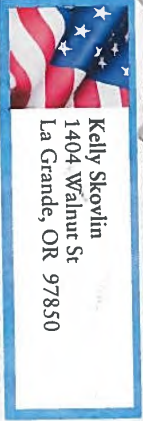
SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
ADDRESS *406 4th St. LaGrande OR. 97850*
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL



Energy facilities Siting Council
c/o Kellen Tardawether, Senior Siting Analyst
Oregon Dept. of Energy
550 Capitol St. NE
Salem, OR 97301

97301-374299



DEPARTMENT OF ENERGY

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RECEIVED

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August 15, 2019

Energy facilities Siting Council
c/o Keller Tardaewether, Sr Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Subject: Idaho Power Application for a Site
Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order

Dear Chair Beyeler and Members of the Council:

COMMENT REGARDING THE BOARDMAN TO
HEMINGWAY TRANSMISSION LINEDRAFT PROPOSED
ORDER

The application is incomplete as Section X
must include information regarding all receptors
within 1/2 mi 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 has failed to comply with OAR 345-021-0010(1)(X) which states that Exhibit X must include information about noise generated by construction and operation of the project within $\frac{1}{2}$ mi of the site boundary. The Site boundary means "the perimeter of the site of a proposed energy facility, it's related or supporting facilities, all temporary laydown and staging areas and all corridors and micro siting corridors proposed by the applicant" (OAR 345-001-0010(55)).

- 1) The applicant lists the areas which are included in the site boundary in Exhibit F, however, they failed to include noise modeling or include all the receptors within the $\frac{1}{2}$ mi. area beyond the 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 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

cont.

3) 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 by this rule as well as all receptors within 1/2 mi 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 1/2 mi 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,

Kelly Skollin

Kelly Skollin

1404 Walnut St

La Grande, OR 97850

August 19, 2019

Energy facilities Siting Council
% Kellen Tardaewether, Sr. Analyst
Oregon Dept of Energy
550 Capitol St. NE
Salem, OR 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposal 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 their 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

P 4/3

on a site not previously used, it states: "Sources exempt from the requirements of section L1) 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 noise generated by the transmission line itself. Noise modeling must be corrected to include (A) Warning devices, (B) sounds created by road vehicles going through my neighborhood and other areas (C) Sounds created by any 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 Code of Federal Regulations, promulgated pursuant to Section 17 of the Noise Control Act of 1972, 86 Stat. 1248, Public Law 92-576; bells, chimes or

P 3/3
carillons; (f) aircraft subject to pre-emptive federal regulations and (k) sounds created by the operation of road vehicle auxiliary equipment.

The application is not complete, without having the information regarding the 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 standards are met or it can be met with additional site conditions. I am mostly concerned about what will happen noise-wise along my road where I have a massage therapy business. Noise will disturb my work.

Sincerely,
Kelly Skovlin
Kelly Skovlin 1404 Walnut St. LaGrande, OR

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

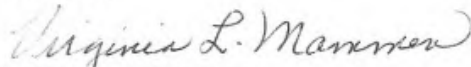
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

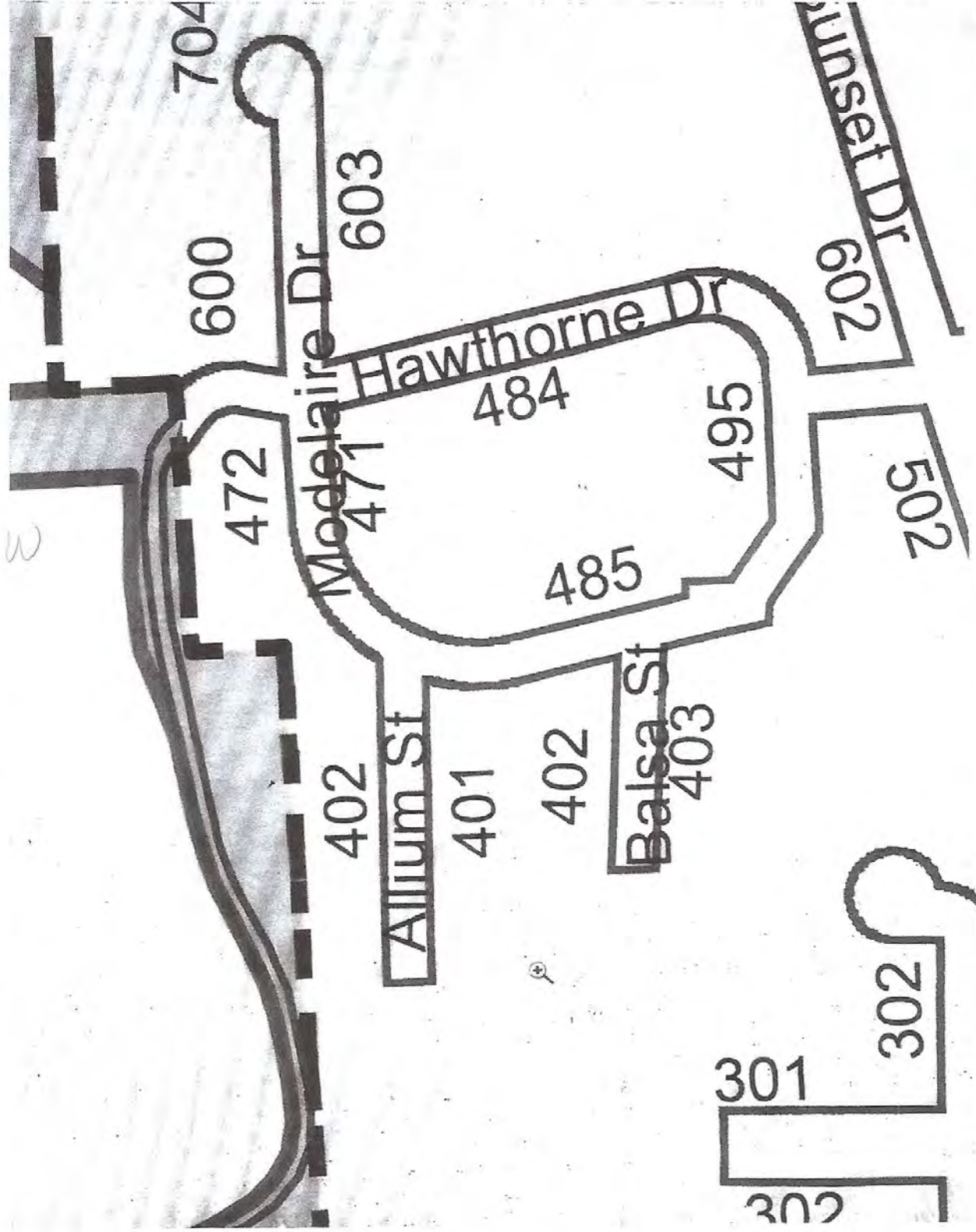


Exhibit 3

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 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

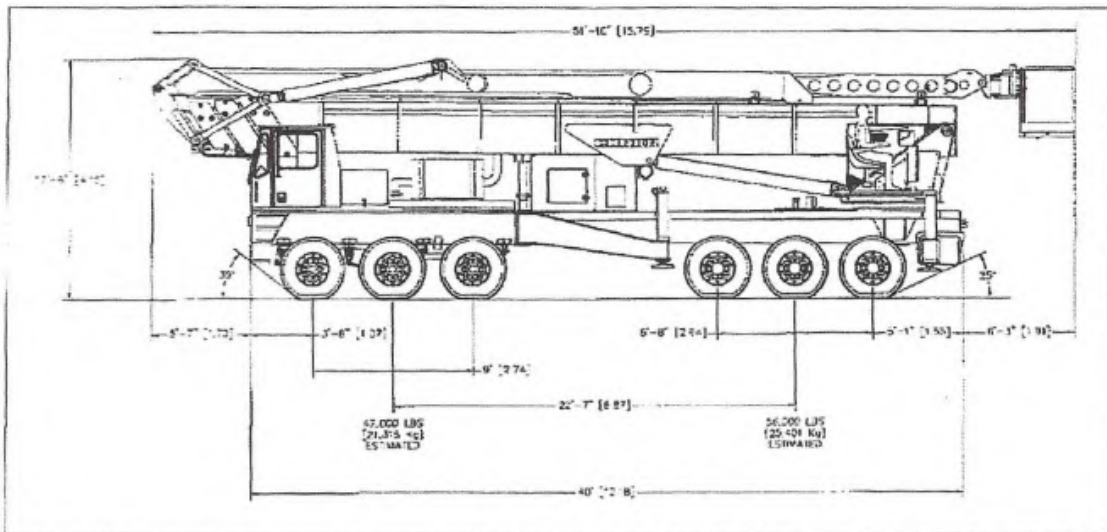


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

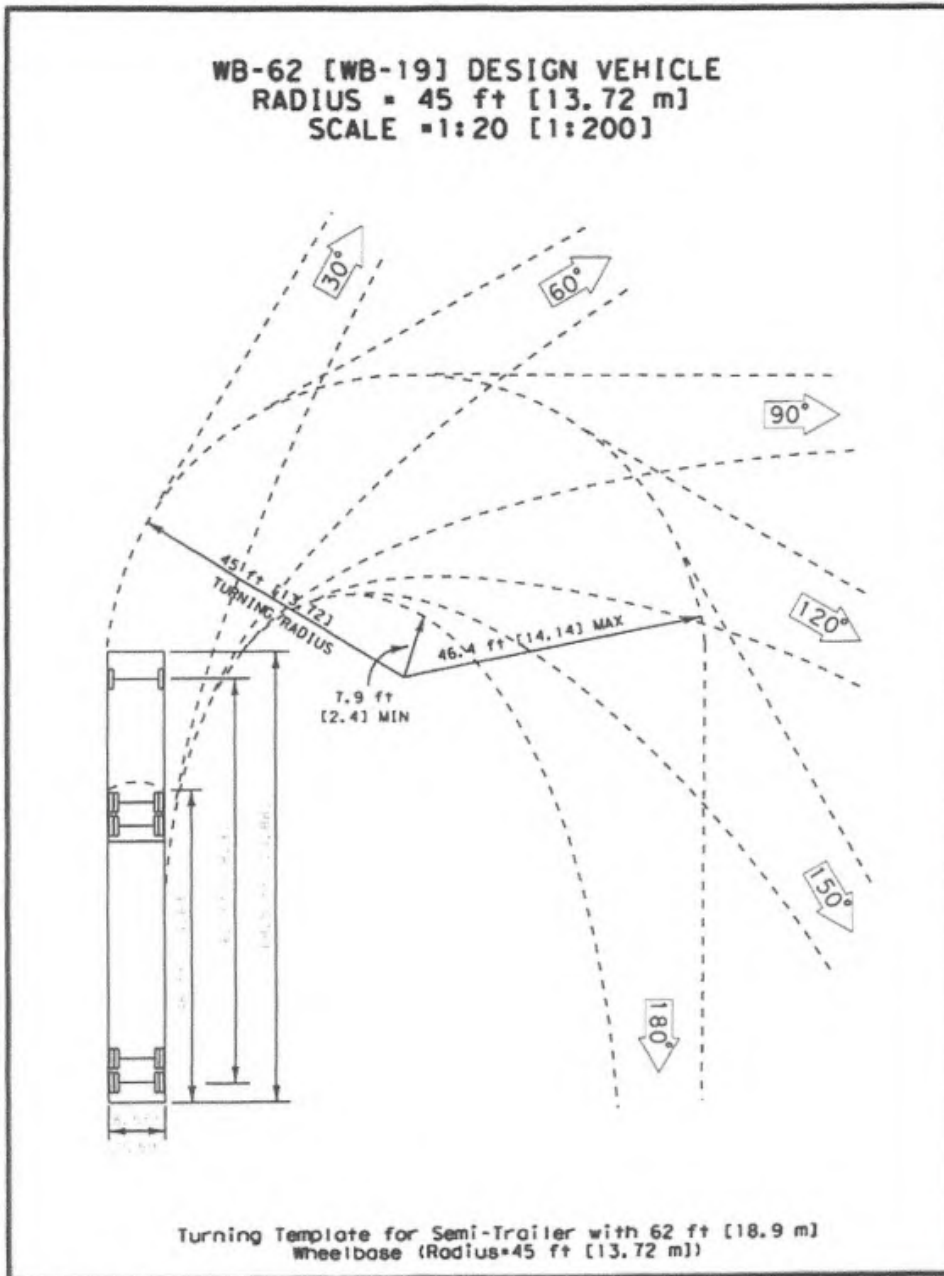


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

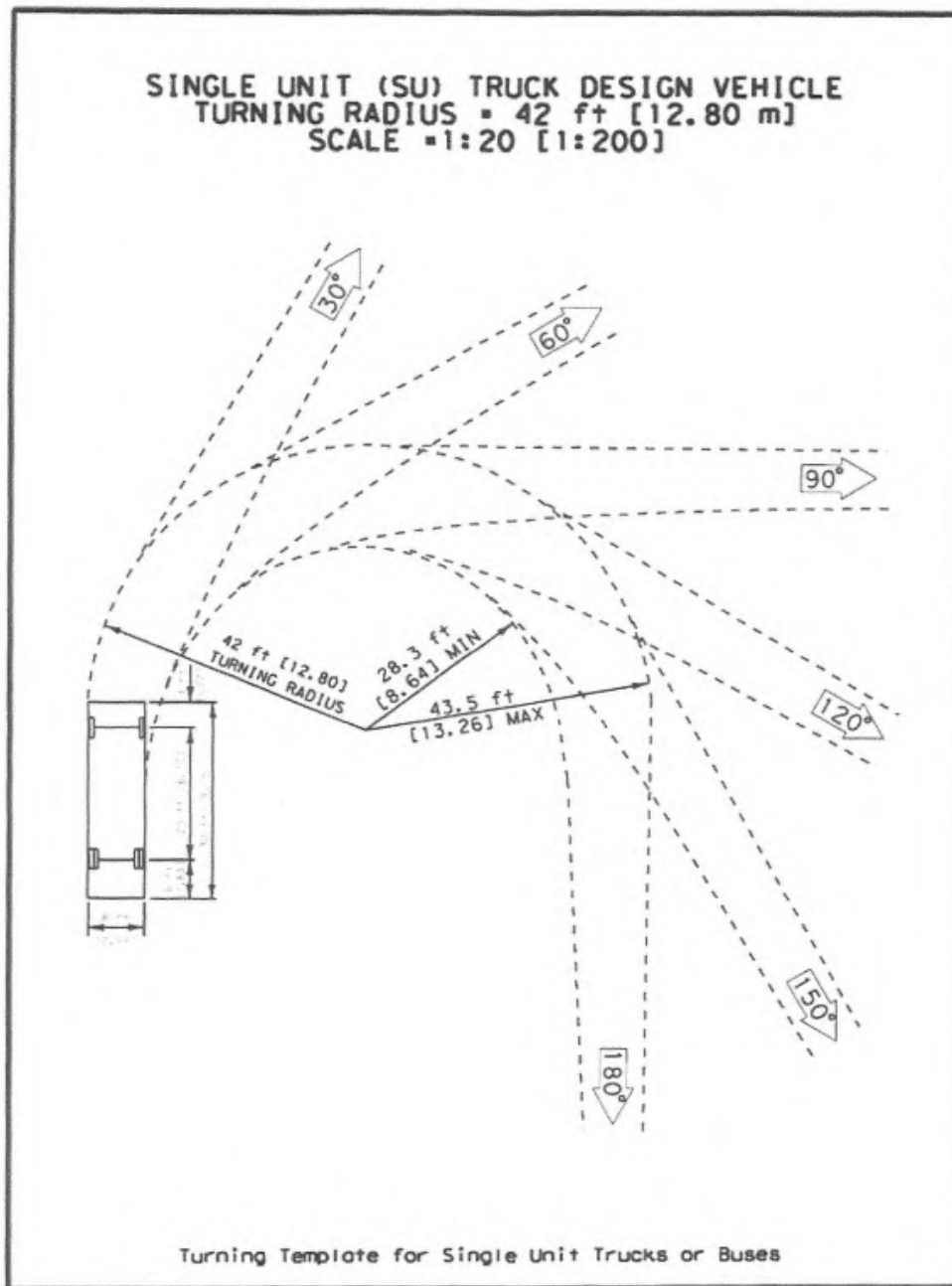


Exhibit 15

**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.

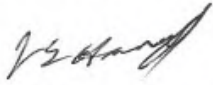
Section 17. TRUCK ROUTES

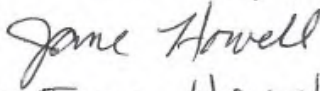
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

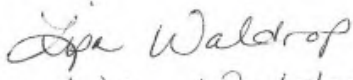
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

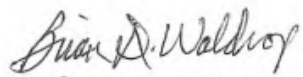
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

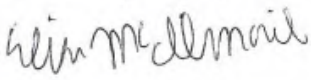
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SIGNATURE 
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EMAIL bdwaldrop58@gmail.com

SIGNATURE 
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EMAIL mcilmail115@hotmail.com


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Jessie Huxell
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SIGNATURE

PRINTED NAME

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EMAIL

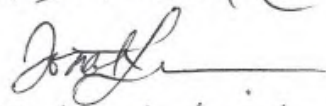

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CHRIS Huxell @ EMAIL.COM

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Jonah Lindeman
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SIGNATURE

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Marie Skinner
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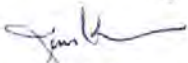
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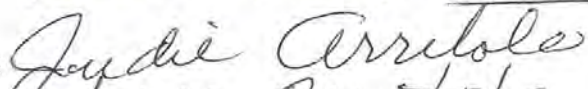
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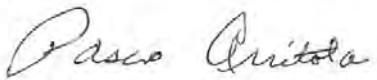
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

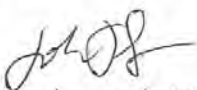
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SIGNATURE 
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EMAIL dmammen@comi.com


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PRINTED NAME Jim Kreider
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EMAIL jkreider@campblackdog.org

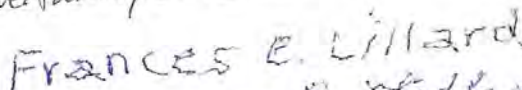
SIGNATURE 
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SIGNATURE 
PRINTED NAME Pasco Arritola
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SIGNATURE 
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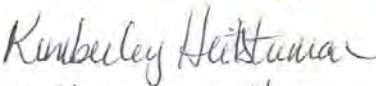
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
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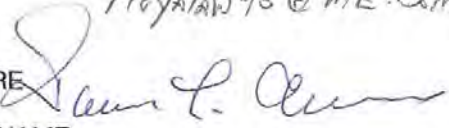
SIGNATURE 
PRINTED NAME Brent H. Smith
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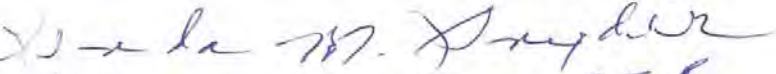
SIGNATURE 
PRINTED NAME M. Jeannette Smith
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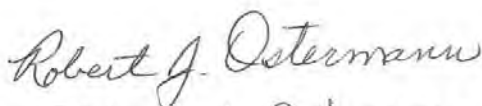
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com

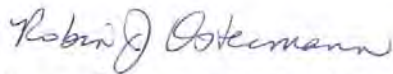
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SIGNATURE: 
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SIGNATURE 
PRINTED NAME Dennis L. Allen
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EMAIL N/A

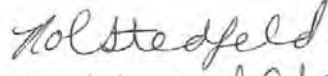
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 MODELAIRE
EMAIL

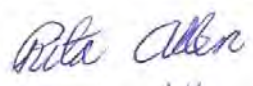
SIGNATURE 
PRINTED NAME Robert J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

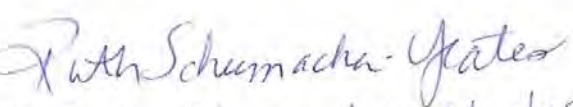
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

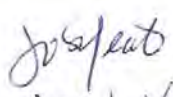
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SIGNATURE 
PRINTED NAME Jonathan D. White
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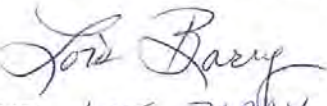
SIGNATURE 
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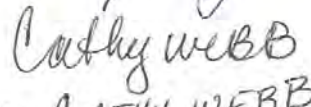
SIGNATURE 
PRINTED NAME Rita Allen
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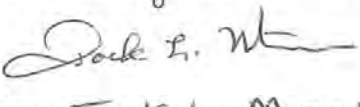
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
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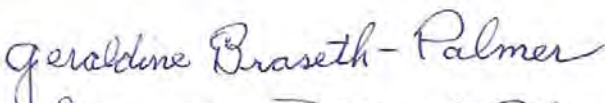

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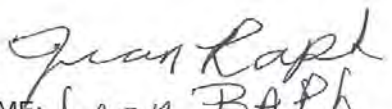
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SIGNATURE 
PRINTED NAME Lois BARRY
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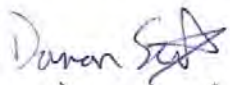
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SIGNATURE 
PRINTED NAME Jack L. Martin
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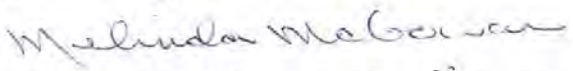
SIGNATURE 
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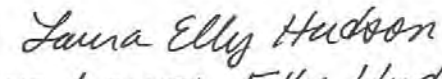
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PRINTED NAME Cory Sexton
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SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
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SIGNATURE *Lynn Wheeler Duncan*
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SIGNATURE *Robert J. Sherer*
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SIGNATURE *Bert R. Freewing*
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SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

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SIGNATURE *Merle E. Comfort*
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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
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,

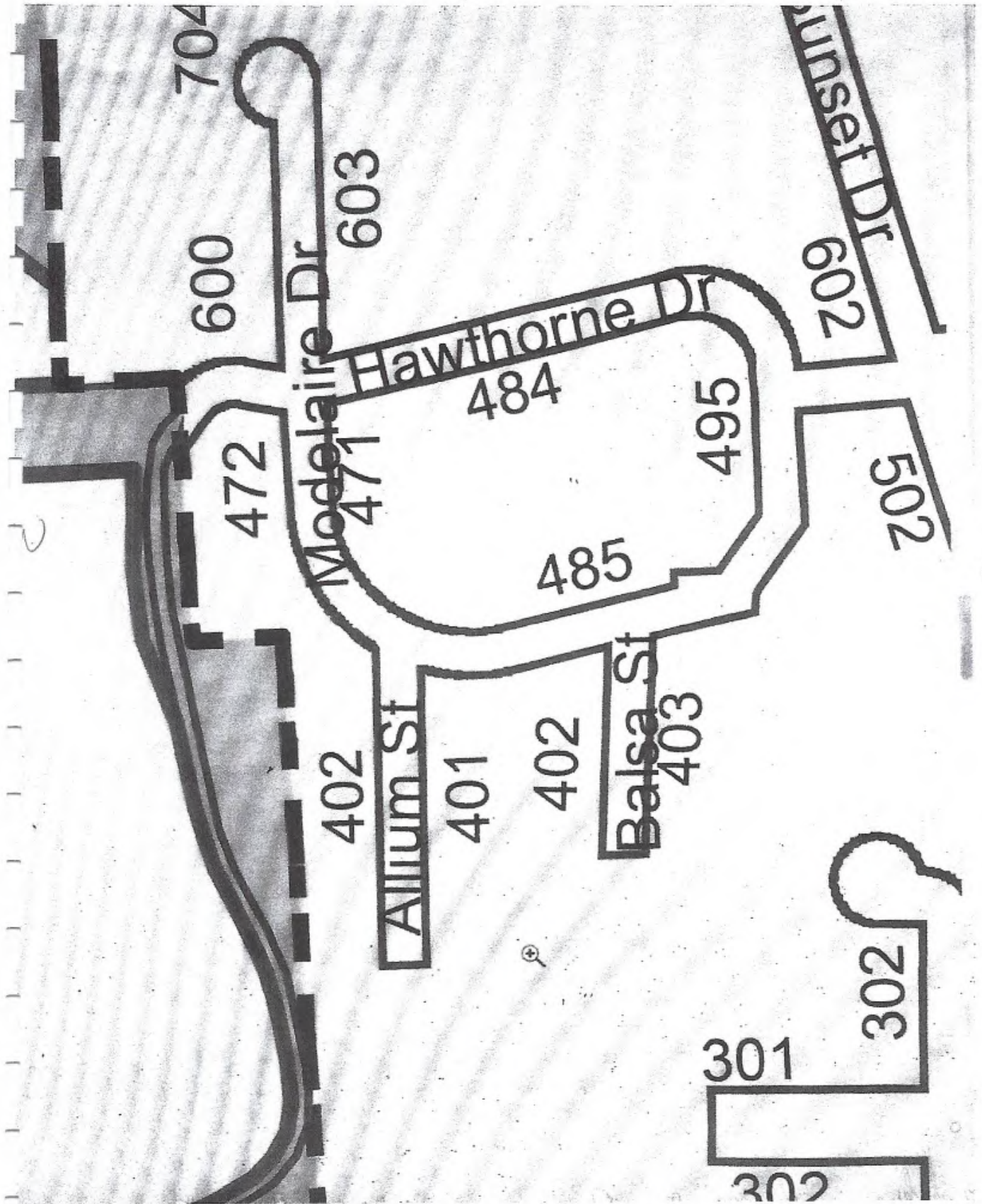


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



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.

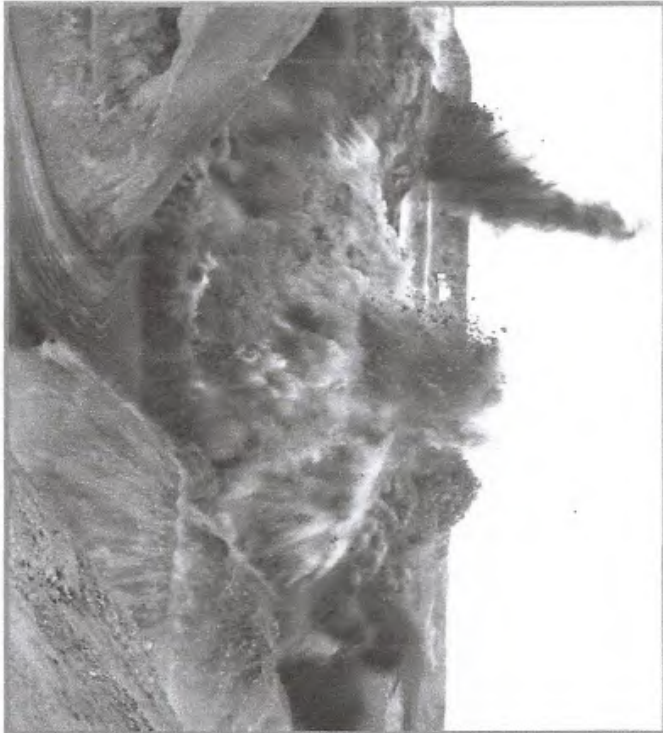
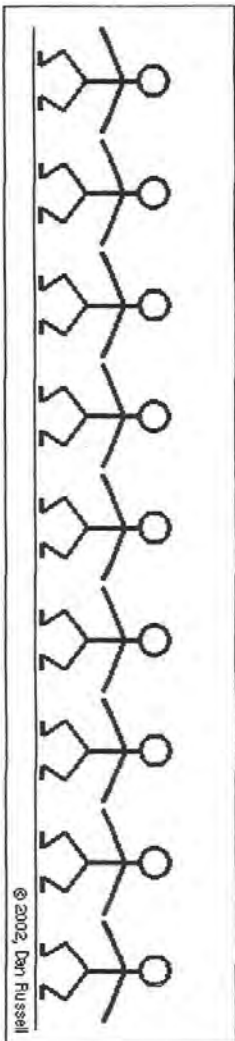


Exhibit 5b

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.

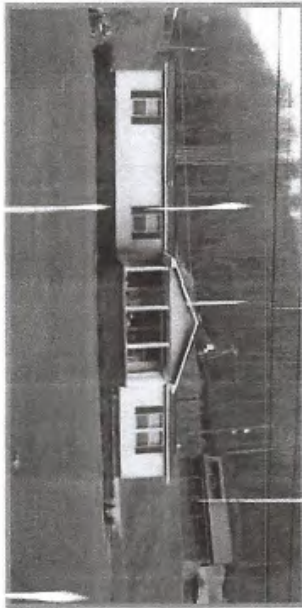
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

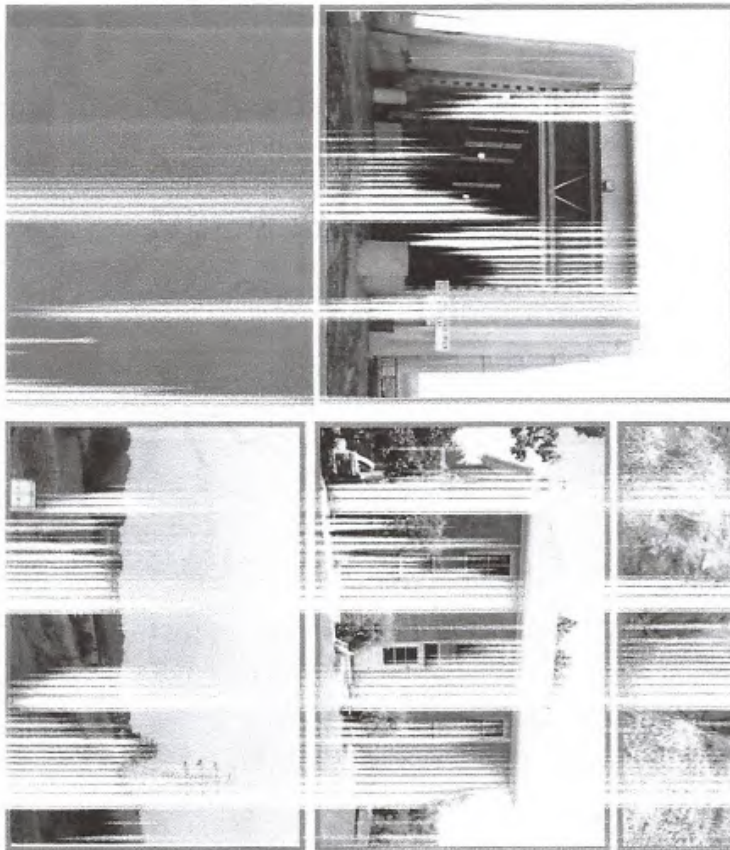
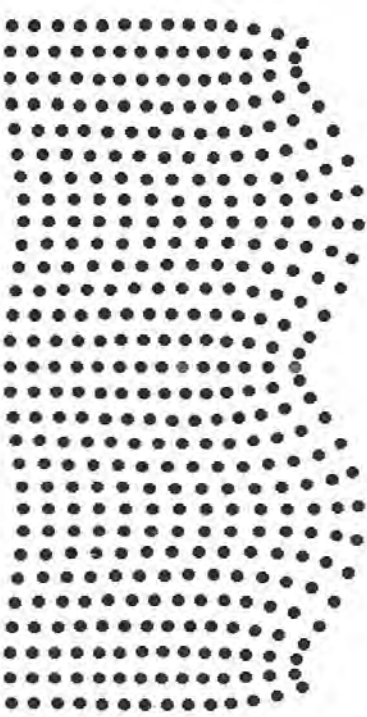


Exhibit 5D

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.



©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.

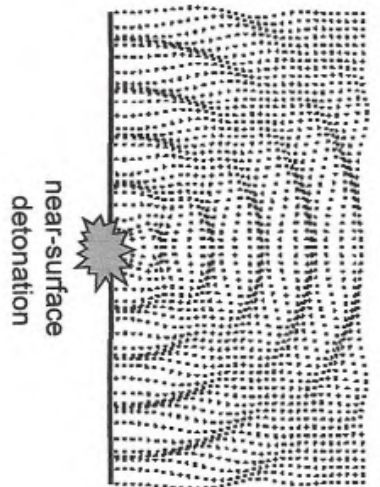
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

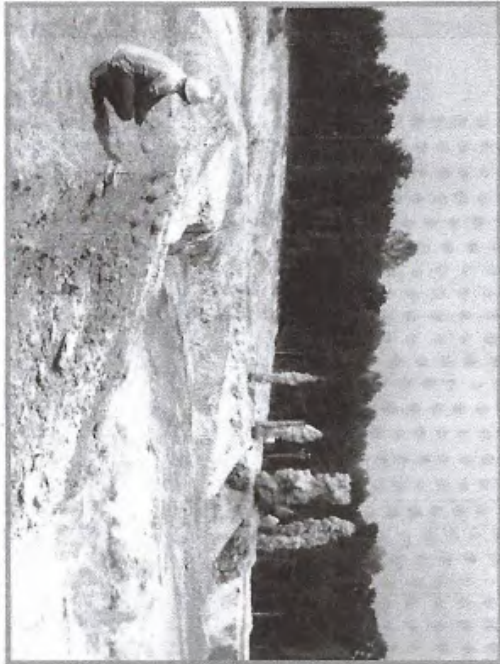
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

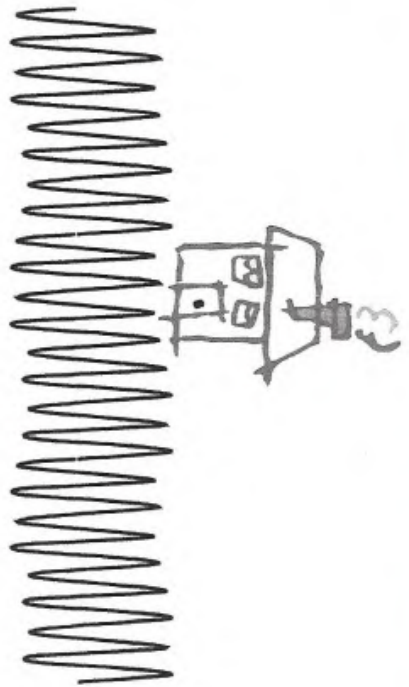
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

Due to the different arrival times of ground and air vibrations, occupants may feel two distinct impacts on the house.

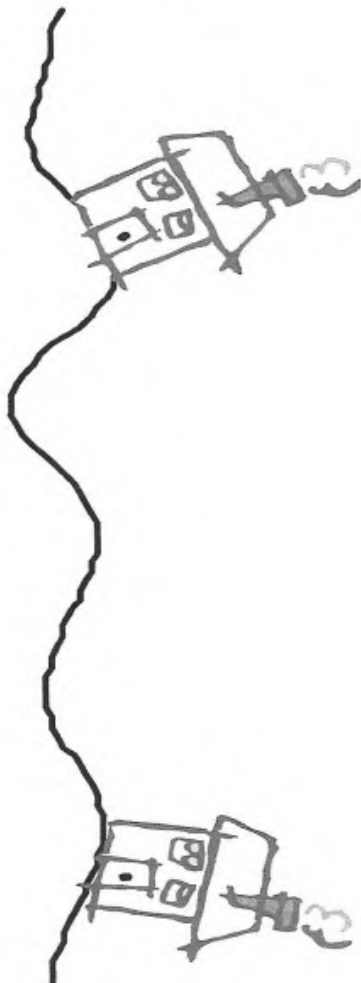


Ground Vibration Structure Response

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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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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Featured Stories

Headlines in Health

Clinical Insights

Nursing Career Development

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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

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

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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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.

8/4/21

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](#)

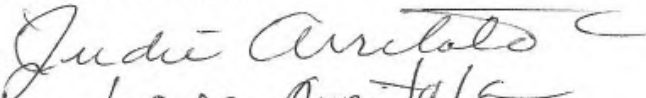


SCIENCE
NEWS


EXPERT
OPINION

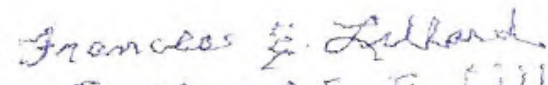
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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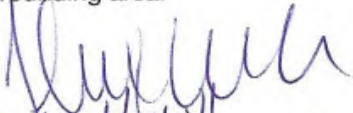
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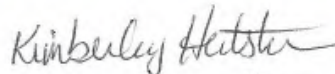
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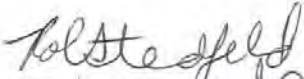
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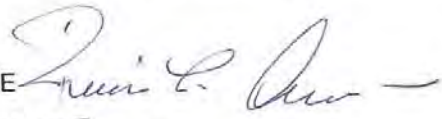
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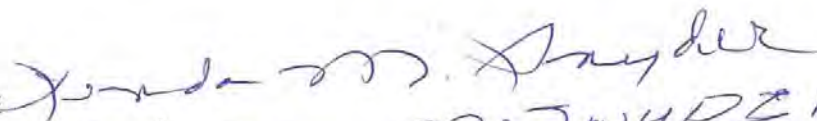
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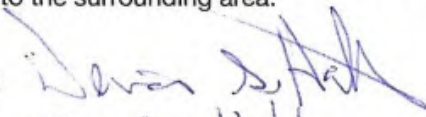
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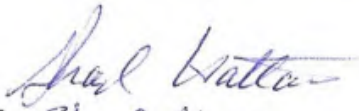
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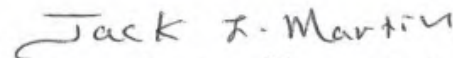
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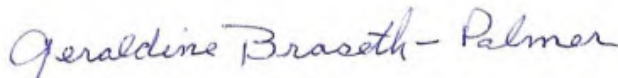
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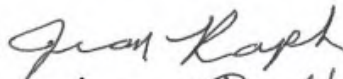
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TARDAEWETHER Kellen * ODOE

From: Teresa Smith-Dixon <teresasmithdixon@gmail.com>
Sent: Monday, August 12, 2019 3:36 PM
To: B2H DPOComments * ODOE
Subject: Comment regarding B2H
Attachments: Comment B2H 8-11-19.docx

Please see attached letter dated 8-11-19. I will also mail a copy. Teresa Smith-Dixon, resident 2002 Jupiter Way, La Grande, OR 97850.

"Do what love requires" DW

August 11, 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, for several reason, about the Boardman to Hemingway Transmission Project as it is proposed. One of my concerns that I will address in this statement is for the safety of myself and all of the citizens of La Grande if this line is permitted. **This concern is regarding wildfire hazards and also slope instability.**

The proposed route sited to the west of La Grande is placed on a ridge noted to have **instability and high risk for slides**. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

This type of slope instability is not unfamiliar to projects like this. For an example 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, including me, and is the Critical Access hospital for this region of Oregon. 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, or any substantial building and disturbance.**

Wildfire is also a significant hazard to our community. An issue very familiar, and an already serious concern, to our family and rural residents in this area. 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. **It is unthinkable to add more risk for wildfire to my community.**

Cal Fire [California] 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 myself and neighbors!**

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: Teresa Smith-Dixon

Address: 2002 Jupiter Way
La Grande, OR. 97850



Ms. Teresa Smith-Dixon
2002 Jupiter Way
La Grande, OR 97850-3220

PORTLAND OR 972
17 AUG 2019 PM 6 L



Energy Facilities Siting Council
c/o Kellan Tardaguet, senior siting Analyst.
Oregon Dept. of Energy
558 Capitol st NE
Salem, OR 97301

RECEIVED

AUG 19 2019

97301-374299

DEPARTMENT OF ENERGY

August 11, 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, for several reason, about the Boardman to Hemingway Transmission Project as it is proposed. One of my concerns that I will address in this statement is for the safety of myself and all of the citizens of La Grande if this line is permitted. **This concern is regarding wildfire hazards and also slope instability.**

The proposed route sited to the west of La Grande is placed on a ridge noted to have **instability and high risk for slides**. The geologic study provided by Idaho Power references several studies (below).

Table H-2. USGS Quaternary Faults within 5 Miles of Project by County on page H-12 clearly shows that the project is placed right on an active fault in the West Grande Ronde Valley Fault Zone. In addition, in exhibit H, Geological Hazards and Soil Stability, Table B3: Soils Descriptions, Union County, much of the erosion hazard is rated "severe." Below is part of the report:

5.2 La Grande Area Slope Instability

As part of our study, we reviewed DOGAMI's open file report: Engineering Geology of the La Grande Area, Union County, Oregon, by Schlicker and Deacon (1971). The study identified several landslides in the areas west and south of La Grande. The majority of the landslide features mapped by Schlicker and Deacon (1971) were similarly mapped as landslides or alluvial fans in Ferns and others (2010). The current SLIDO database uses the feature locations mapped in Ferns and others (2010). While the two map sets generally agree, there are differences in the mapped limits of some landslide and alluvial fan areas, and there is one landslide area in Schlicker and Deacon (1971), near towers 106/3 and 106/4, which is not included in SLIDO or Ferns and others (2010). The Landslide Inventory in Appendix E includes mapped landslide and alluvial fan limits from both SLIDO and Schlicker and Deacon (1971).

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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,

Teresa Smith-Dixon

Name: Teresa Smith-Dixon

emailed 8/12/19

Address: 2002 Jupiter Way
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

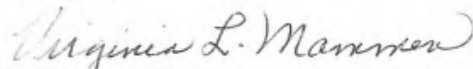
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

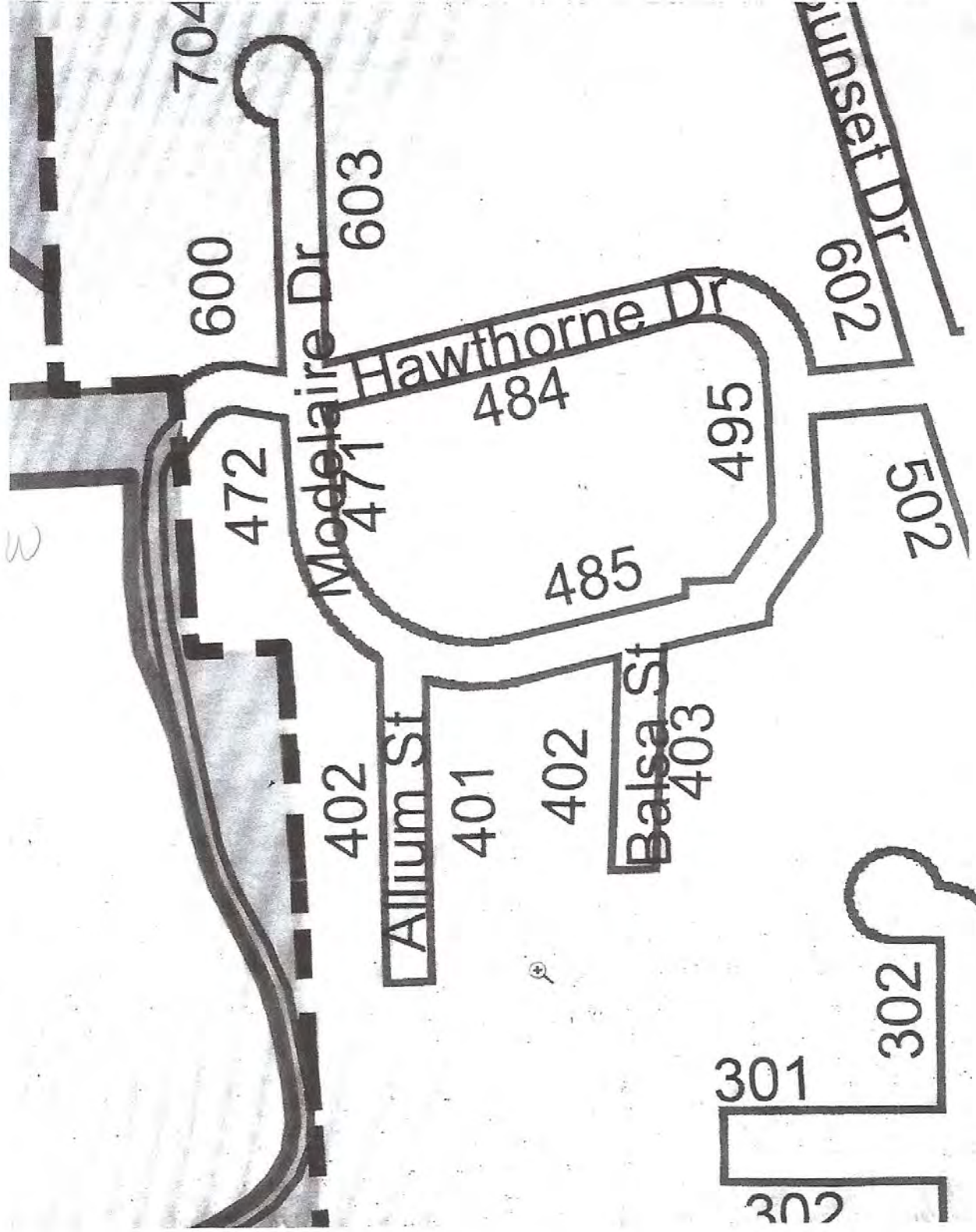


Exhibit 3

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

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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 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

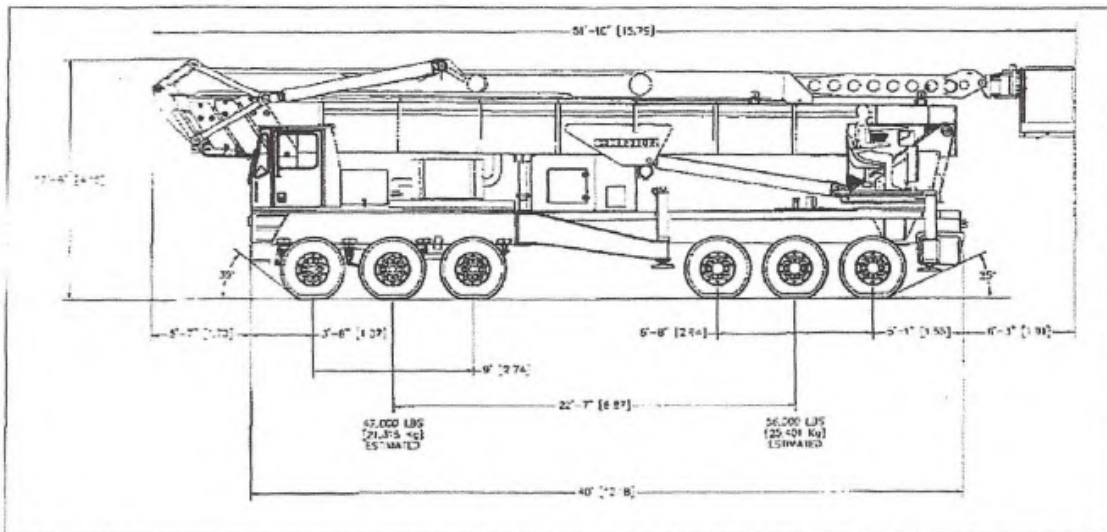


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

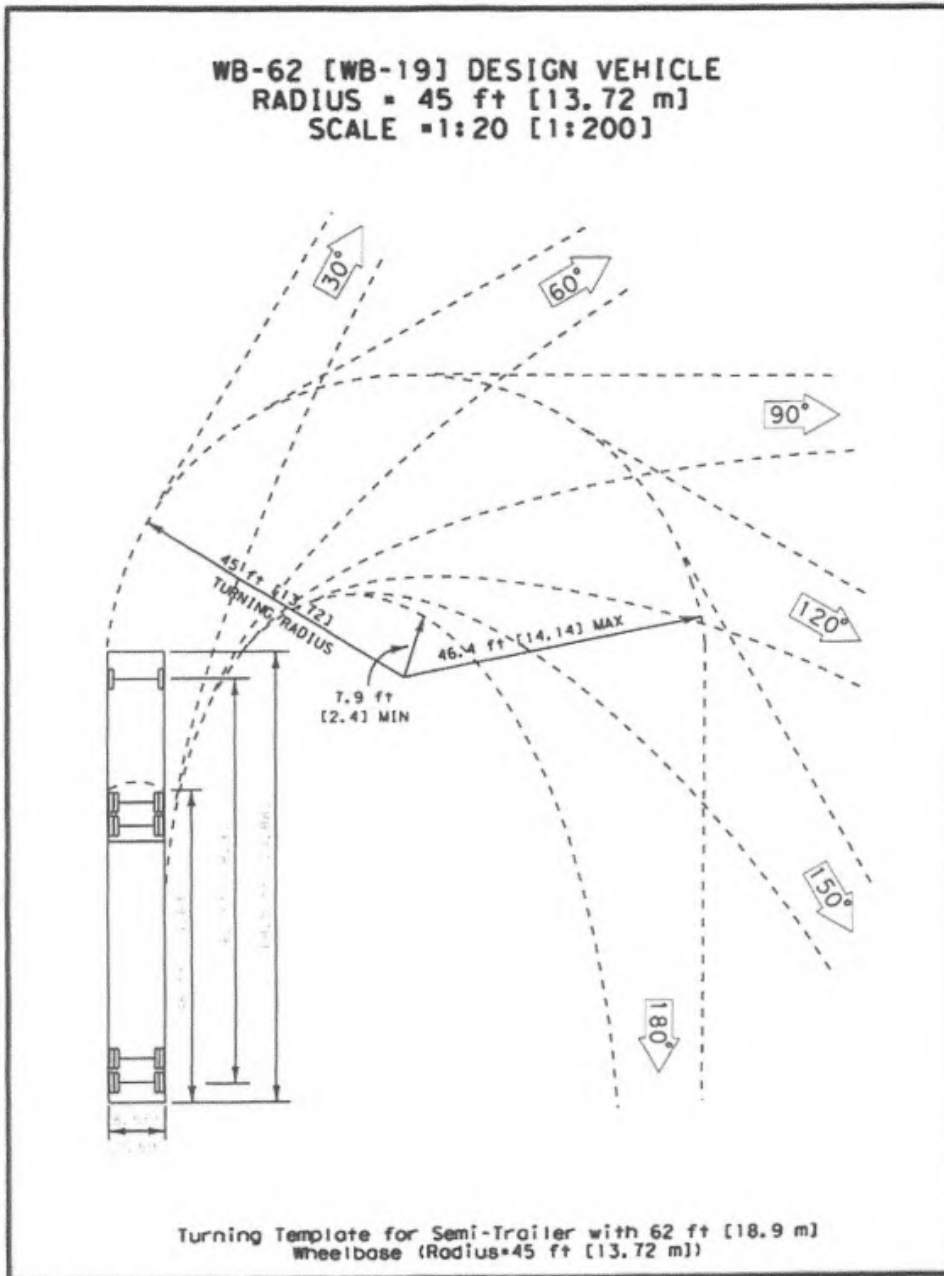


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

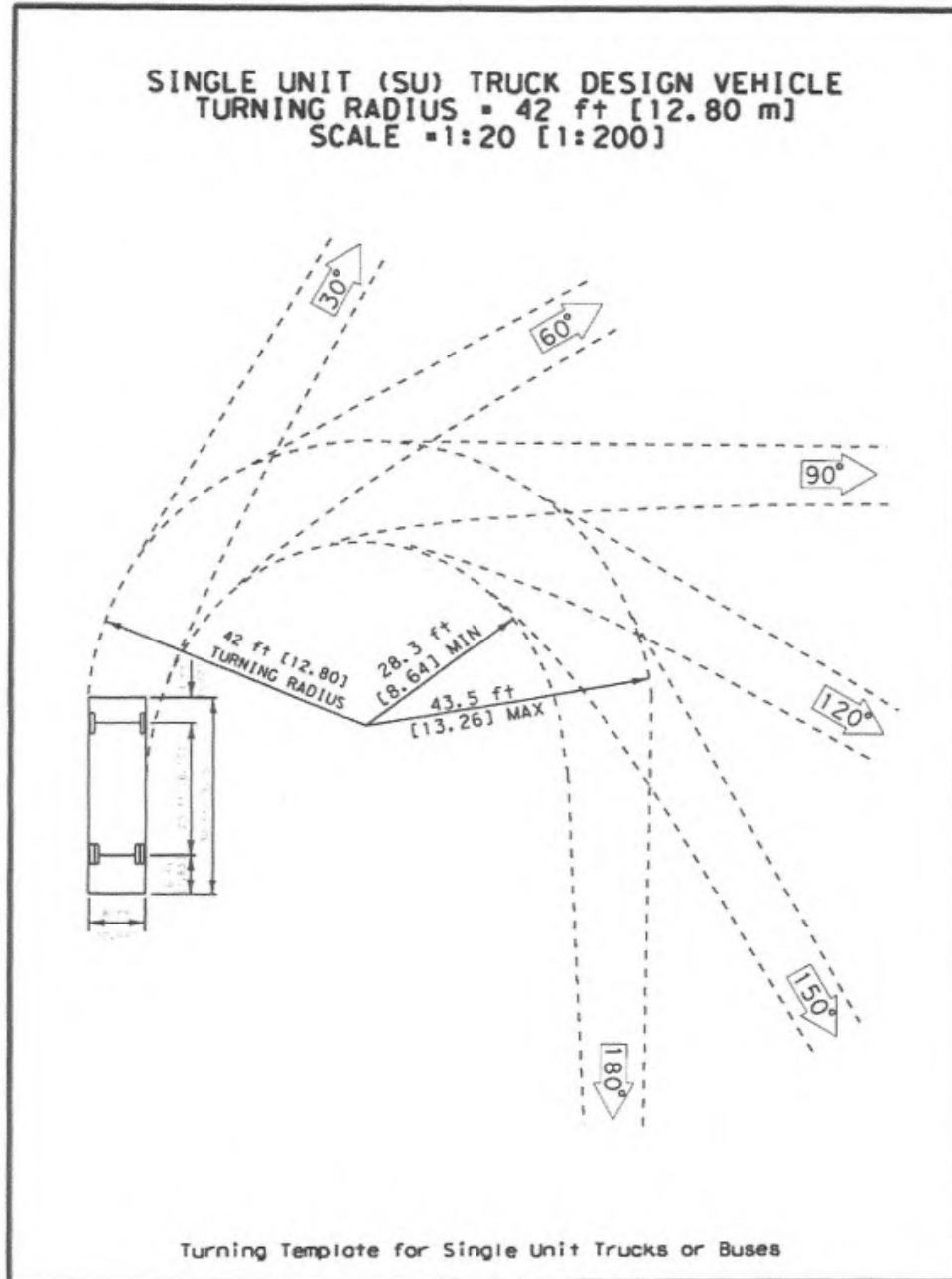


Exhibit 15

**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.

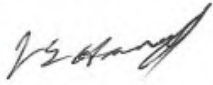
Section 17. TRUCK ROUTES

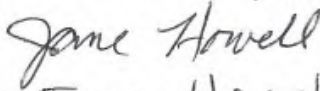
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

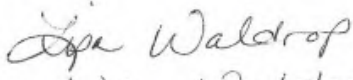
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

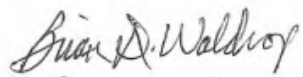
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

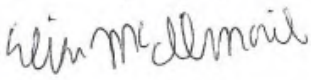
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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.

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SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

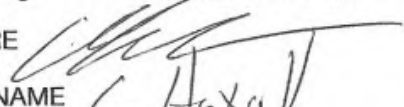

Jessie Huxell
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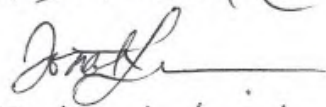

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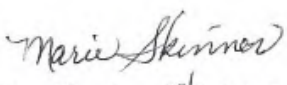

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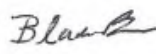

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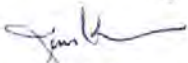
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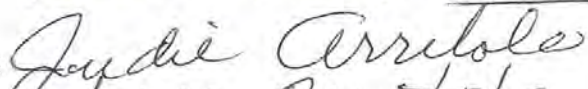
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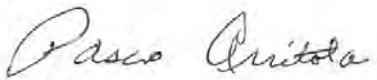

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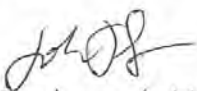
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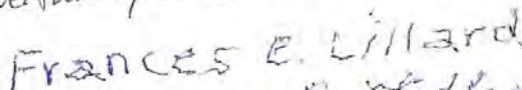
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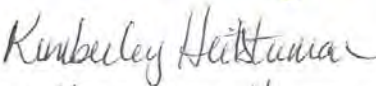
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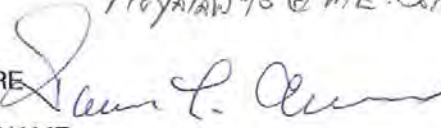
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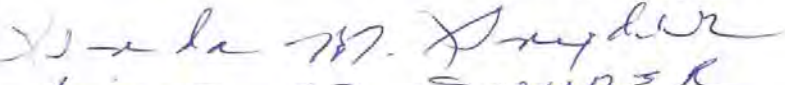
SIGNATURE 
PRINTED NAME M. Jeannette Smith
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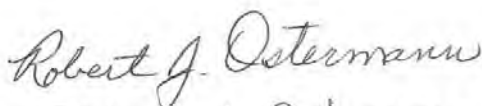
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
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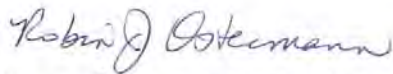
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SIGNATURE: 
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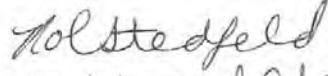
SIGNATURE 
PRINTED NAME Linda Snyder
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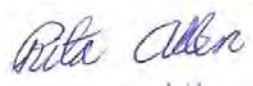
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PRINTED NAME Robert J. Ostermann
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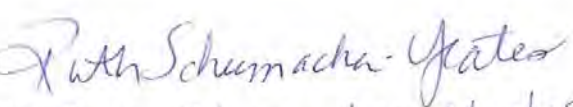
SIGNATURE 
PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr. La Grande, OR 97850
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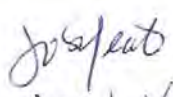
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SIGNATURE 
PRINTED NAME Jonathan D. White
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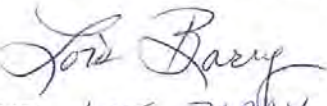
SIGNATURE 
PRINTED NAME Robin Stedfeld
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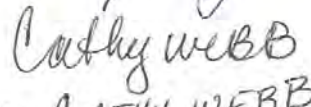
SIGNATURE 
PRINTED NAME Rita Allen
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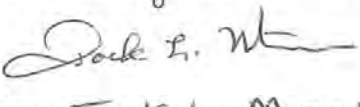
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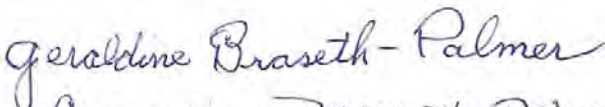

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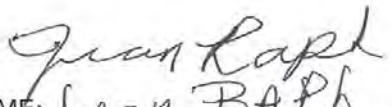
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PRINTED NAME LOIS BARRY
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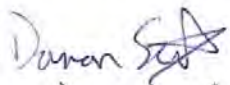
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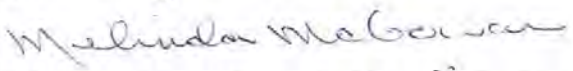
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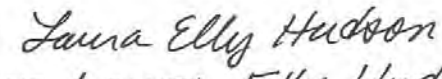
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SIGNATURE *Gary D. Pierson*
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SIGNATURE *Anne G. Cavinato*
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EMAIL acavinat@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
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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*
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PRINTED NAME 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*
PRINTED NAME Robin Maille
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PRINTED NAME *Bruce C*
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SIGNATURE *Carol S. Summers*
PRINTED NAME CAROL S. SUMMERS
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SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 NTH St. LaGrande - OR 97850
EMAIL

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SIGNATURE *Gerald D. Juniper*
PRINTED NAME *Gerald Darwin Juniper*
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TARDAEWETHER Kellen * ODOE

From: Dale Mammen <dmammen@eoni.com>
Sent: Thursday, August 15, 2019 5:28 PM
To: B2H DPOComments * ODOE
Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposal Order 5/23/2019
Attachments: Scan 2019-8-15 17.14.06.pdf

To: Chairman Beyeler and Members of the Council

Find attached a letter sign by me and 46 other residents of La Grande expressing our concerns regarding the B2H Project and requesting that EFSC Deny the Site Certificate.

I have also sent a bound copy of this material by US Postal Service.

Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

August 10, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. N.E.
Salem, Oregon. 97301

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018:Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

My comment is about the predicted noise levels resulting from construction and operation of the proposed Boardman to Hemingway Transmission Line Project. I would like to address the noise coming from the blasting and rock breaking specifically above the area at the top of Modelaire Drive 1 both to the north and the south of that area and also the construction traffic noise that that will impact the west hills and the area below.

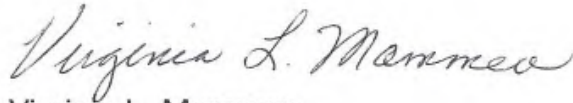
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less than a second. Impulse (instantaneous) noise from blasts could reach up to 140dBA at the blast location or over 90 dBA within 500 feet." This sounds oh so "don't worry about it, it will be OK just over in a split second." Living in this area off Modelaire Drive, I don't find this at all comforting. And the fact that this will be overseen by properly licensed personnel and all of the necessary authorizations doesn't help anything either.

The area in question, which for such inordinate construction is extremely close to many residents, has been my home for over 50 years and during

related medical problems and exhibit various reactions to loud noises.¹⁰ These children also live in the neighborhoods to be affected by the noise so they would be impacted coming and going to school, at home and also while at school. To impose the constant possibility of loud noises is cruel, disrespectful and totally unacceptable.¹¹

For a project like this involving blasting and heavy machinery noise so close to homes, schools, and medical facilities impacting hundreds of peoples' daily lives, the day to day agitation, wondering what is coming next, fear and being on constant alert are not just addressed by some type of mitigation but must be addressed by a route that is much less impactful to peoples' safety, sanity, and health.

Sincerely,

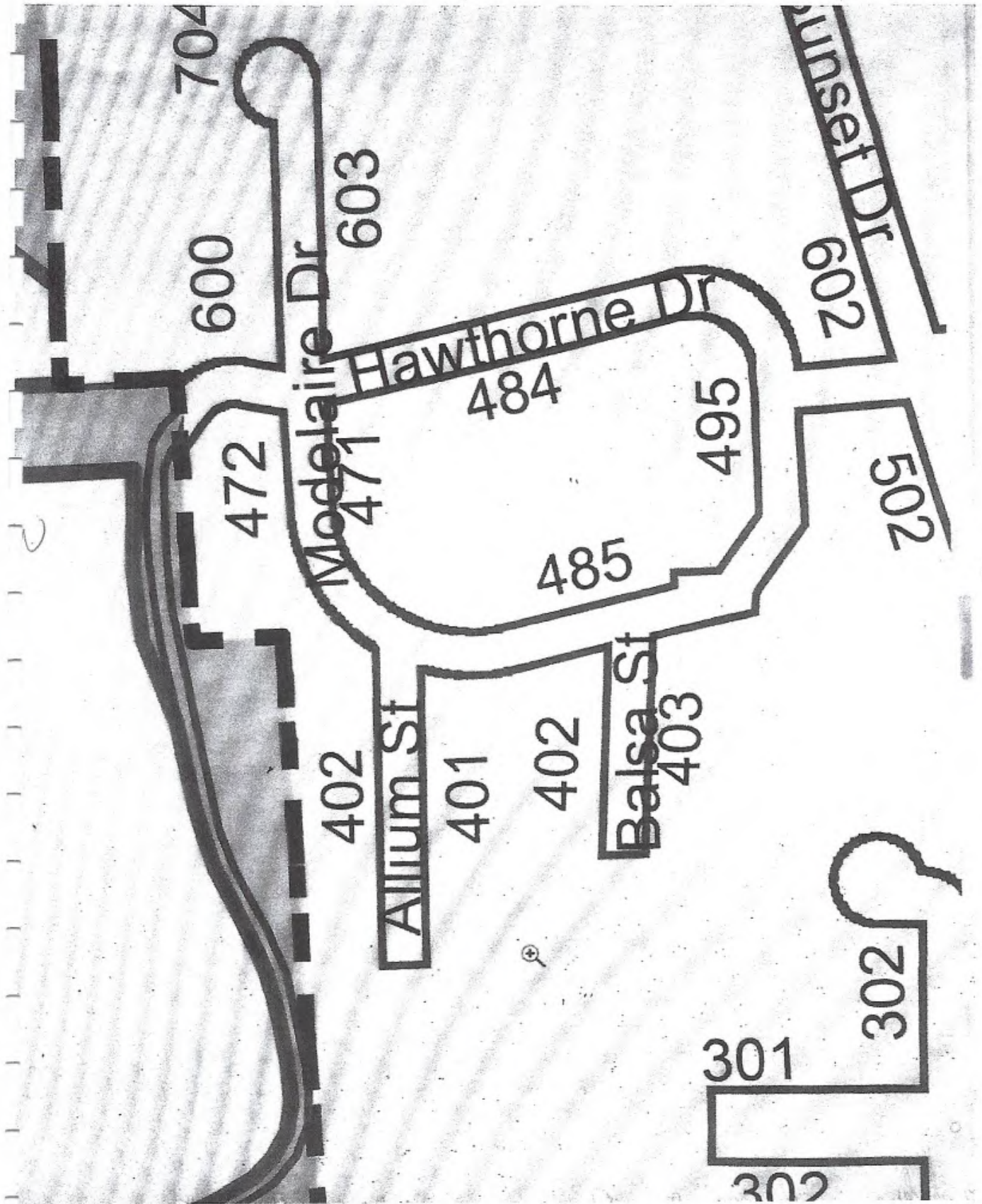


Virginia L. Mammen
405 Balsa
La Grande, Oregon 97850

gmammen@eoni.com

Exhibit 1

N



5

Exhibit 2

Boardman to Hemingway Transmission Line Project

Exhibit X

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.

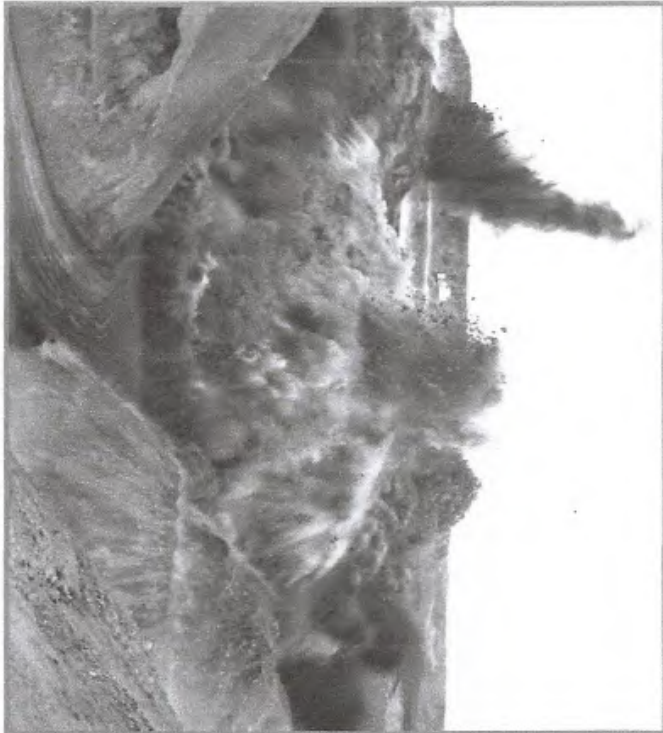
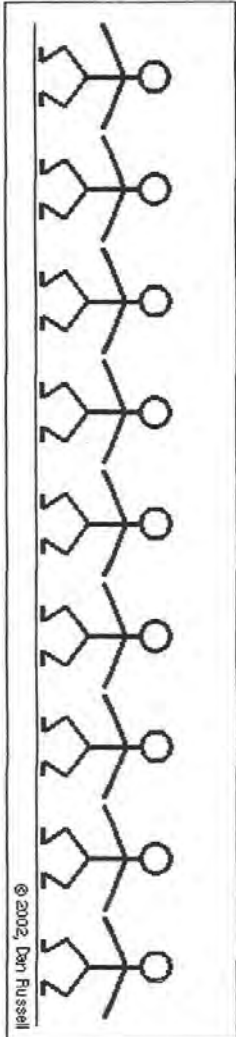


Exhibit 56

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.

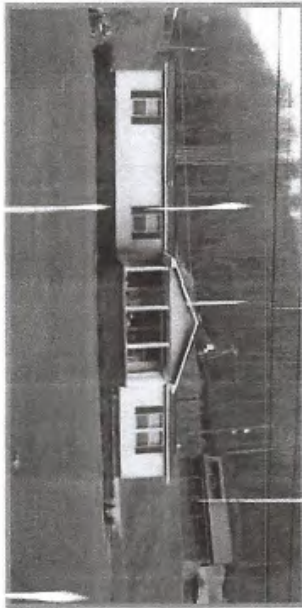
Airblast may be audible (noise) or in-audible (concussion). When outside a house the blast may be heard because of the noise, however noise has little impact on the structure. The concussion wave causes the structure to shake and rattles objects hanging on walls or sitting on shelves. This "interior 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

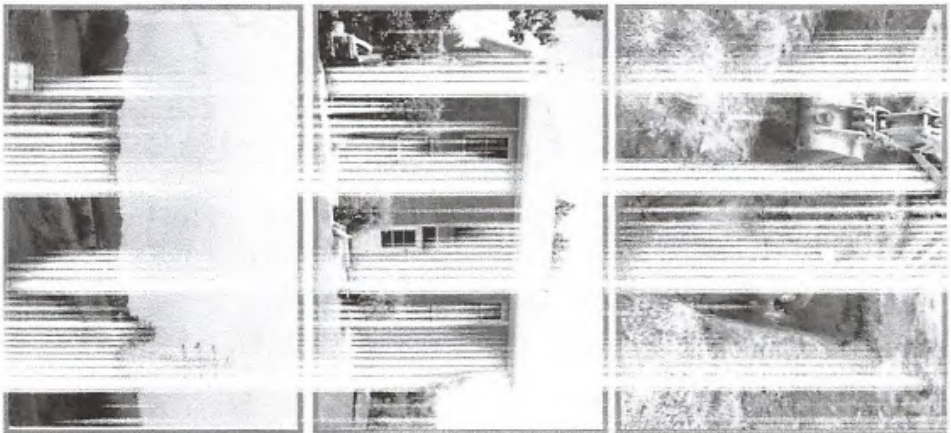
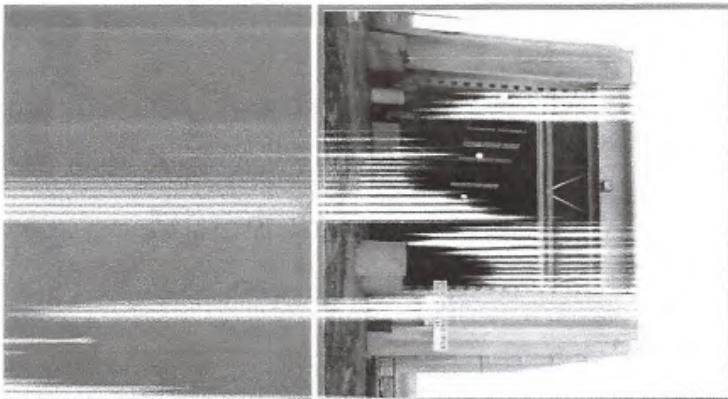
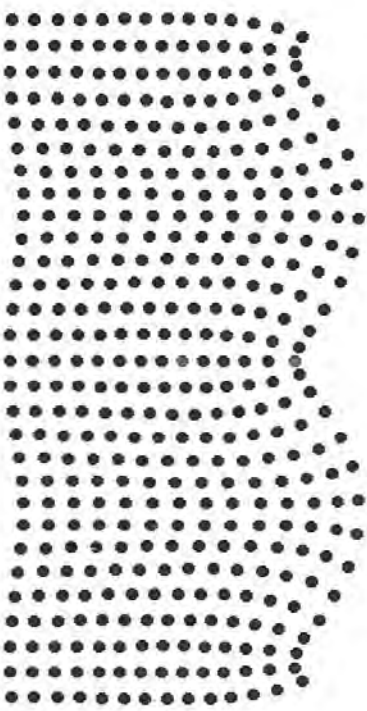


Exhibit 5D

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.

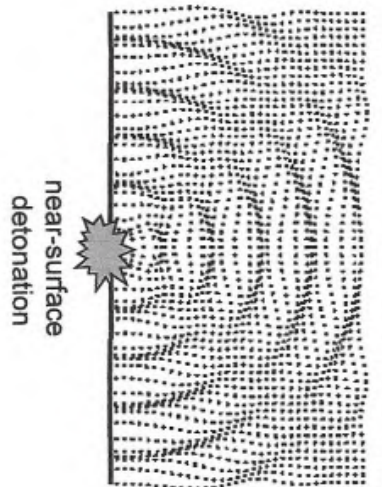
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

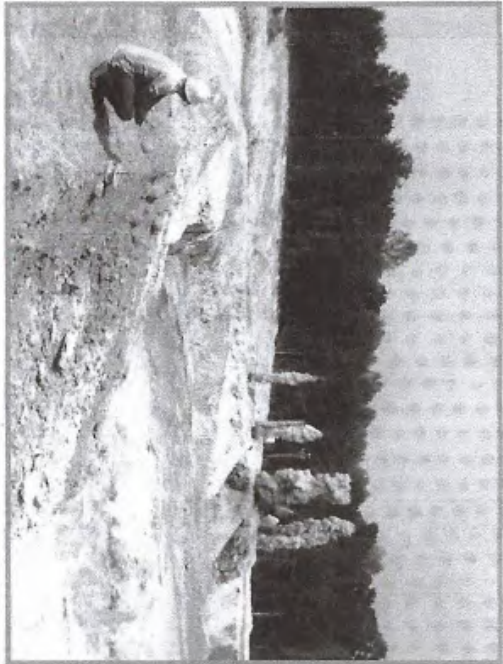
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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

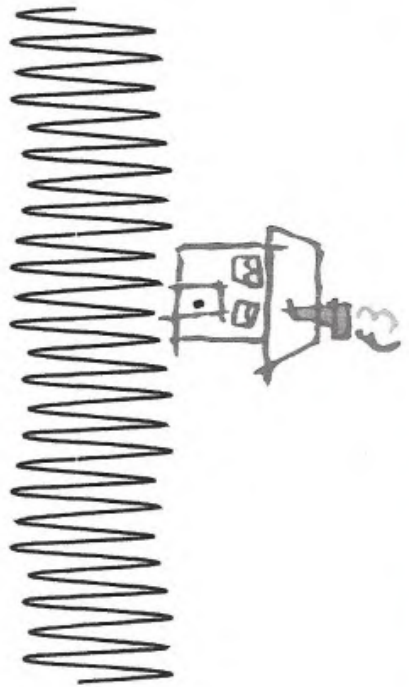
Airblast enters the house through the roof and walls. Like ground vibrations, the frequency and amplitude of the vibrations affect structure response. However the low frequency events (concussion) that most strongly affect structures is normally only a one or two cycle event.

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



Harvard Health Publishing
HARVARD MEDICAL SCHOOL

Trusted advice for a healthier life

A noisy problem - Harvard Health

Exhibit 16
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What can we help you find?



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PAIN

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CANCER

DISEASES &
CONDITIONS

MEN'S
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



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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Nursing Career Development

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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

8/4/2019

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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



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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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
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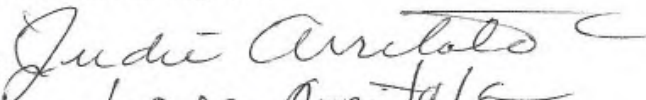


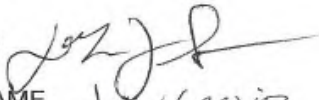
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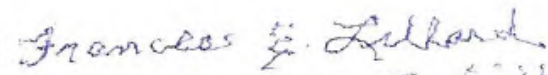
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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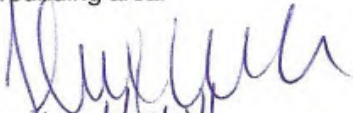
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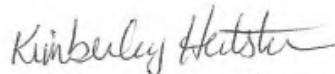
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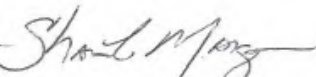
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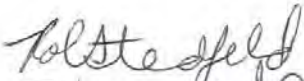
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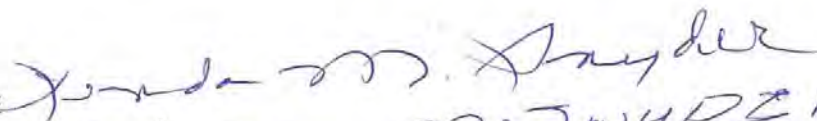
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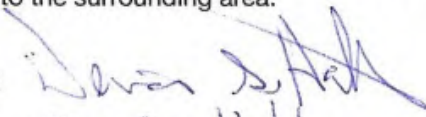
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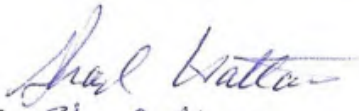
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PRINTED NAME

Shad Hattan

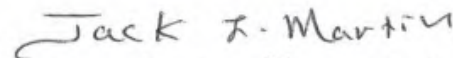
ADDRESS

507 Sunset Dr

EMAIL

hattansl88@gmail.com

SIGNATURE



PRINTED NAME

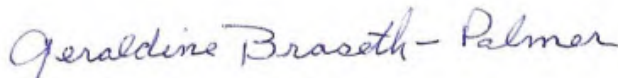
Jack L. Martin

ADDRESS

1412 Gildcrest Dr.

EMAIL

SIGNATURE



PRINTED NAME

GERALDINE BRASETH-PALMER

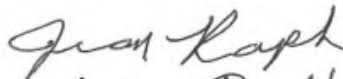
ADDRESS

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
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL sexton.damon@gmail.com

SIGNATURE *Coy Sexton*
PRINTED NAME Coy Sexton
ADDRESS 401 Balsa Street, La Grande, OR 97850
EMAIL coytris@gmail.com

SIGNATURE *Melinda McGowan*
PRINTED NAME Melinda McGowan
ADDRESS 602 Sunset Dr.
EMAIL melindamegowan@gmail.com

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

SIGNATURE
PRINTED NAME
ADDRESS
EMAIL

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Lois Barry*
PRINTED NAME LOIS BARRY
ADDRESS P.O. Box 566, LA GRANDE, OR 97850
EMAIL loisbarry31@gmail.com

SIGNATURE *Cathy Webb*
PRINTED NAME CATHY WEBB
ADDRESS 1700 Cedar St. LA GRANDE, OR 97850
EMAIL thinkski@gmail.com

SIGNATURE *JoAnn Marlette*
PRINTED NAME JOANN MARLETTE
ADDRESS 2031 Court St. #8, Baker City, OR 97814
EMAIL joannmarlette@yahoo.com

SIGNATURE *Keith D. Hudson*
PRINTED NAME Keith D. Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL KeithDhudson@gmail.com

SIGNATURE *Laura Elly Hudson*
PRINTED NAME Laura Elly Hudson
ADDRESS 605 F Ave, La Grande OR 97850
EMAIL ellyhudson@gmail.com

I have read the attached letter regarding noise and it expresses my concerns and my request to abandon the use of the proposed route for the Boardman to Hemingway Transmission Project and that it be rerouted to an area that is much less impactful to the residents of La Grande and to the surrounding area.

SIGNATURE *Lynn Wheeler Duncan*
PRINTED NAME LYNN WHEELER DUNCAN
ADDRESS 489 Modelaire Drive, LaGrande OR 97850
EMAIL ylwd1910@gmail.com

SIGNATURE *Gary D. Pierson*
PRINTED NAME Gary D. Pierson
ADDRESS 489 Modelaire Drive, La Grande OR 97850
EMAIL -

SIGNATURE *Anne G. Cavinato*
PRINTED NAME Anne G. Cavinato
ADDRESS 86 Hawthorne Dr. La Grande OR 97850
EMAIL acavinot@ecu.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR. 97850
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
ADDRESS 209 SWAPLO LA GRANDE OR 97850
EMAIL merlecomfort@gmail.com

SIGNATURE *Robin L. Maille*
PRINTED NAME Robin Maille
ADDRESS 401 Cedar St., La Grande
EMAIL rmaille@icloud.com

SIGNATURE *Carol Summers*
PRINTED NAME CAROL S. SUMMERS
ADDRESS 2811 Bekelen 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*
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ADDRESS 97w Hawthorne Dr, La Grande, OR 97850
EMAIL asherer@frontier.com.

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Madelaine Dr. La Grande, OR 97850
EMAIL hnull@conic.com

SIGNATURE *Bert R. 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) Irwin H Smutz

Mailing Address (mandatory) 59074 Foothill Rd
LaGrande Ore 97850

Phone Number (optional) (541) 963-5034 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.)

I want to testify what it is like for a power
line to go through my Ranch.

Page 142

1 But historically, like I said, the Oregon
2 Trail, we have to consider it. We have got the
3 procurement of land, and apparently no letters were
4 offered for the initial route before anybody had a
5 chance to respond. And now this new thing comes in and
6 we all get a surprise.
7 I think a lot of people have a lot more to say
8 about this than me; so I'm just going to yield back my
9 time.
10 HEARING OFFICER WEBSTER: Thank you.
11 Following Irwin Smutz, we have Jeri Watson,
12 and then I don't know if Idaho Power wants to -- okay.
13 So then we will hear from Idaho Power after that.
14 MR. IRWIN SMUTZ: My name is Irwin Smutz, and
15 I live at 59074 Foothill Road. My ranch borders the
16 game refuge. I have got two oil lines, two gas lines,
17 and two fiberoptic lines, and the power line that, I
18 think your alternative route, I think the preferred
19 route is going to be just above that power line.
20 I have two concerns: One of them is the fire
21 danger. That present power line set a fire a few years
22 ago close to Ladd Canyon. The people that ran the power
23 line, a long distance line, failed to keep the brush cut
24 underneath the line, and the tree grew up and that line
25 arced and started a fire.

Page 143

1 Also, in the site, the area where they are
2 going to put the proposed power lines through that you
3 are talking about is in an unstable area. My dad went
4 up and checked the cows when I was a boy, and he got up
5 to this real steep unstable area, and the ground had
6 shifted because of another line that came through, an
7 oil line, it shifted, and this pipe came out, out of the
8 ground 5 or 6 feet in the air and made a bend.
9 Fortunately, it did not break, or oil or gas or whatever
10 they put through that, would have ran down the hill.
11 Well, this proposed power line is going
12 through that area where that shift was. They cut
13 through shale type ground, and they kind of loosened the
14 thing up. So that's a thing that really kind of
15 concerns me. Of course, we have a lot of game of all
16 kinds, we border the game refuge.
17 But I would just like to share that this is
18 one problem that you would have. The building site
19 where all my buildings are on the ranch there are down,
20 of course, at the bottom of the hill, and I guess the
21 building site where my buildings are slid off the top of
22 the mountain some time in prehistoric history. And the
23 geologist out there told Dad, I guess the rest of it
24 will stay up there. But that line is going to be going
25 right across that unstable land.

Page 144

1 And also it was kind of hinted at by another
2 speaker, where the hospital is, that is really unstable,
3 too. They had to put in a huge amount of cement to try
4 to keep that thing from shifting, the new building that
5 they put there at the hospital.
6 The site that my house is on is also shifting.
7 I have a board fence and they have all pulled away from,
8 in places they have pulled away from the posts because
9 the building site is going down the hill. Well, that is
10 a thing that you are dealing with on the power line
11 going through that area.
12 So I just really appreciate you listening to
13 me, but I am concerned. These people have serious
14 concerns, it makes a really big difference. You can put
15 these things through and they'll pay so much a foot to
16 go through and then you put up with it for the rest of
17 your life.
18 Just an example, I went to put some fence
19 across all those pipe lines, and somebody came out and
20 told me I was not allowed to put any steel posts in the
21 fence going across that because some of the, I guess the
22 fiber optic lines or something were only underneath the
23 line about 4 inches they said.
24 So I really appreciate you folks listening.
25 And I just wanted to share that with you. I have had

Page 145

1 quite a bit of experience on things coming through my
2 land, and it does have everlasting consequences once
3 these things go through.
4 Thank you very much.
5 HEARING OFFICER WEBSTER: All right. Jeri
6 Watson.
7 MS. JERI WATSON: Hello. Long day. I really
8 appreciate you all being here. And I'm Jeri Watson,
9 J-e-r-i, W-a-t-s-o-n, and I live at 1906 Foley Street in
10 La Grande.
11 I've been here for about 40-some years. And I
12 moved here, I came from a city in California called
13 Torrance, and I moved here to teach school, knowing that
14 I wouldn't make the kind of salary here that I would
15 make in places that I was capable of going. I'm not
16 trying to be modest, but I'll just give you an idea of
17 my qualifications. I could teach, I'm certified in
18 special ed, high school, elementary school, I speak
19 three languages; one being Spanish. The others are
20 Japanese and obviously English. I was at the top of my
21 class at University of Southern California, and I really
22 could have gone anywhere if money was important to me.
23 Enough money to get by is important.
24 But my folks didn't want me to come here.
25 They said, You can't eat the scenery. But I live every

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 117/2 and 118 or vicinity on unstable and steep slopes in an active seismic zone**

My name is Irwin Smutz. My family has lived in La Grande for since 1862. My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to me and my neighbors.

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 117/2 and 118** and vicinity are shown and described on the following tables and maps with analysis by Shannon & Wilson, Inc.:

Soils; Map page 22 of 44:

Table B3: Soil Descriptions, described as:

56E, erosion hazard; severe; percent of slope Low; 2: High; 35. (sheet 2 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 44

117/2 –Angle change along alignment.

118 – No information included for this tower.

E.2.16 SLIDO 311

SLIDO -3.4 Fern ML2010_311 Northing: 5002434 Easting: 421959 Sheet 16

“SLIDO 311 is references at a scale of 1:100.000 (Ferns et al, 2010), and its mapped extents intersect the IPC Proposed Route between towers 118/4 and 118/6 and the Morgan Lake Alternative alignment between ML-19/2 and ML-19/3. While IPC Proposed Route tower 118/5 and its associated work area are within the area mapped as SLIDO 311, the feature is considered as talus/colluvium, not a landslide, a field reconnaissance of the area should be performed as part of the geotechnical exploration program.”

E-2-17 SLIDO 2280, 2282

SLIDO-3.4 FernM2001a_2280 and FernML2001b_2282

Northing: 5001693 Easting: 421505 Sheet 16

SLIDO-3.4-Fern ML2201b_2281

Northing: 4999554 Easting: 422283 Sheet 16

“SLIDO 2280 and 2282 are a single small landslide that is located between the USGS Glass Hill and Craig Mountain quadrangles. Review of the DTM and aerial photographs suggest that the features of the landslide extend beyond the SLIDO mapped limits, as shown on the Landslide Inventory (Sheet 16). The IPC Proposed Route crosses the apparent landslide limits between towers 118/6 and 119/2. An existing road is present in the apparent head scarp area (near the 2280 and 2282 contact line).”

One of the above described slides caused the buckling in the transmission line going across my property. It is bowed up above ground. How safe does that sound? Why would it be a good idea to run a high voltage transmission line along side of it?

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.**"

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 29) includes the following brief description of the area: 4-3.2.3 The Craig Mountain Section (802c) The Craig Mountain section consists of about 6 miles of fault, forming steep range front along the east flank of Craig Mountain. Craig Mountain is identified by linear fronts and numerous springs, with hot springs located at the northern end of the section. Latest Quaternary displacement has not been identified at this time; however, multiple landslide complexes located along the mountain front may be covering evidence of recent faulting. The Faults in the Craig Mountain section have an average strike of N49° W and an estimated dip of 60° NE to 70° NE. Vertical offsets of the Miocene CRB are estimated to be around 2,400 feet of Hot Lake springs (Personius, 2002e).

"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.

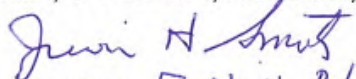
There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to a populated area. Further study and subsequent intrusive construction will not reduce the risks to the safety of the residents nearby. **The application does not 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 other utility lines already on my home place.

Erwin Smutz  Irwin H. Smutz
Address: 57074 Foothill Rd
LaGrande, OR 97850
References:

Barrash, Warren, John G Bond, John D. Kauffman, and Ramesh Venkatakrisnan, 1980, Geology of the La Grande Area, Oregon: Oregon Department of Geology and Mineral Industries Special Paper 6.

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 *SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2*; Oregon Department of Geology and Mineral Industries.

Ferns, Mark L. McConnell, V. S., Madin, I.P., and Johnson, J.A., 2010 Geology of the Upper Grande Ronde Basin, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open-File Report 2003-11, 85.0, scale 1:125,000.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy, Energy Facility Siting Council, OAR Amend: 345-022-0020; *Structural Standard* EFSC 2-2017 Chap. 345, Division 22; General Standards for Siting Facilities. Effective date: 10/18/2017.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018, Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035, page 28 and elsewhere.

Personius, S. F. Compiler, 202c, Fault number 802a West Grande Ronde Valley fault zone, Mount Emily section, in Quaternary fault and fold database of the United States: U. S. Geological Survey website <http://earthquakes.usgs.gov/hazards/qfault>, accessed 11/16/2016 06:23 PM

Schlicker, H. G. and Deacon R. J. 1971 Engineering Geology of the La Grande Area, Union County, Oregon: Oregon Department of Geology and Mineral Industries Open File Report O-1971-03, 16 p., 1 plate, scale 1:24,000.

State of Oregon Department of Geology and Mineral Industries; Publications Center;
<http://www.oregongeology.org/pubs>.

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:

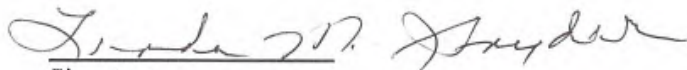
1. They placed measuring points “representative of the house and yard accommodations.” Measuring points were placed “in similar surroundings experiencing the same weather and acoustic conditions of where a resident was expected to spend the majority of time when outdoors,” or they were placed to accommodate 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: LINDA M SNYDER

Mailing Address: 491 Modelaire Drive (P.O. Box 398)
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.

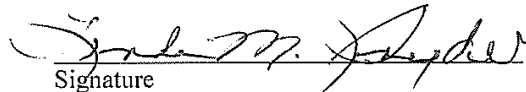
The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

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,

 SNYDER
Signature _____ Printed Name: LINDA M Snyder

Mailing Address: 491 Modelaine Drive (P.O. Box 398)
LaGrande OR 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035, page 28 and elsewhere.

Union County, Oregon, Union County Emergency Operations Plan – Hazard Analysis. Updated – 6/30/2016.

Drilling on steep slopes

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

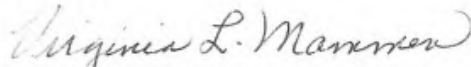
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

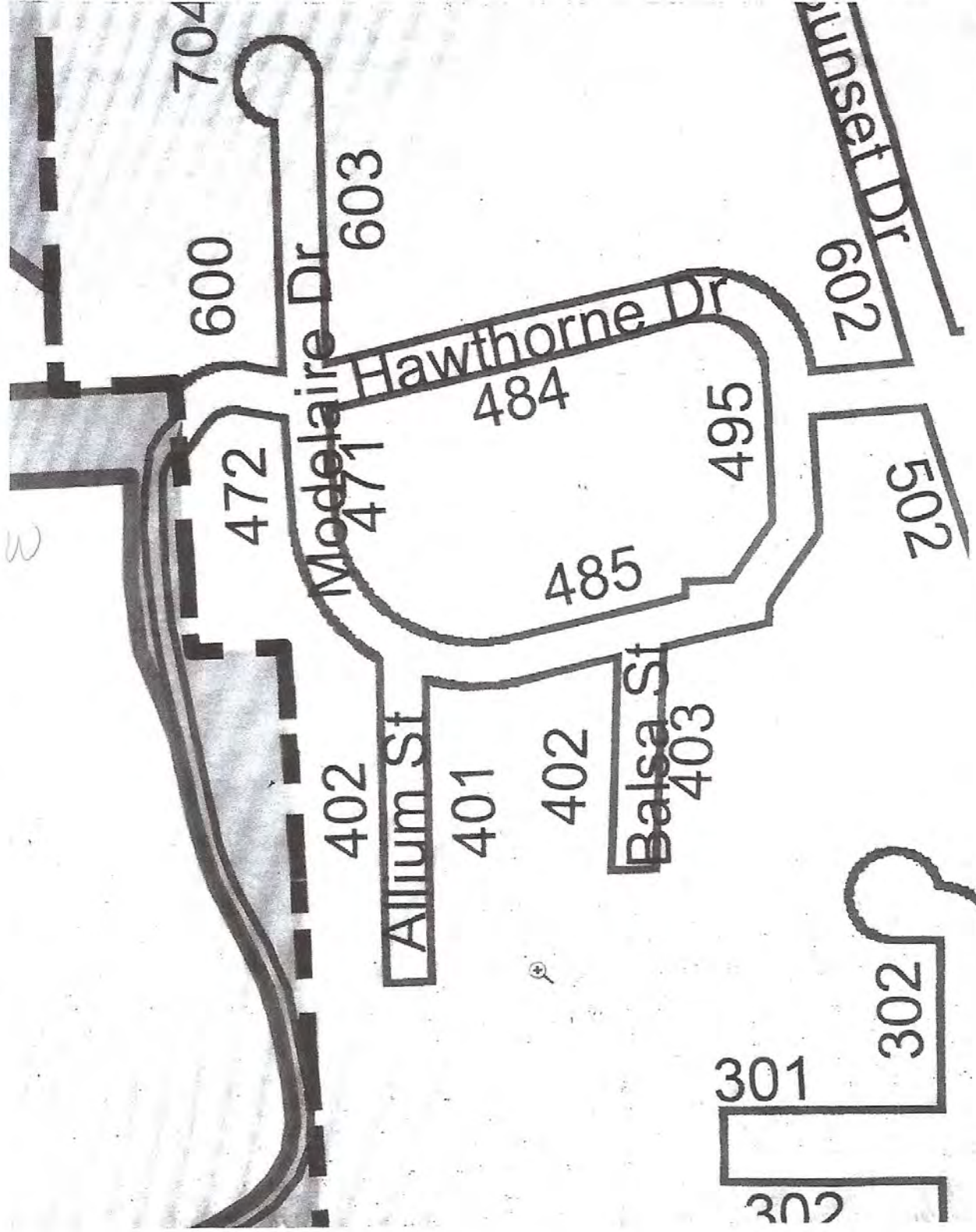


Exhibit 3

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



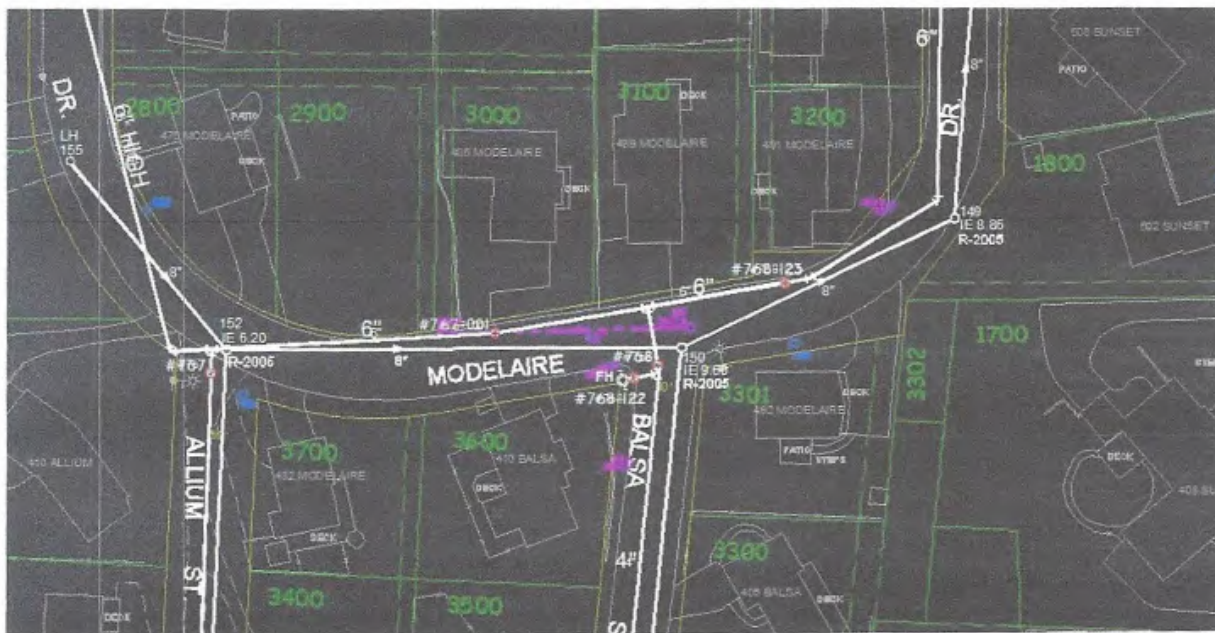
Hawthorne.jpg
150K

Modelaire.jpg
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7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

0 (1397x451)

Exhibit 8



Exhibit 9

attachment U2

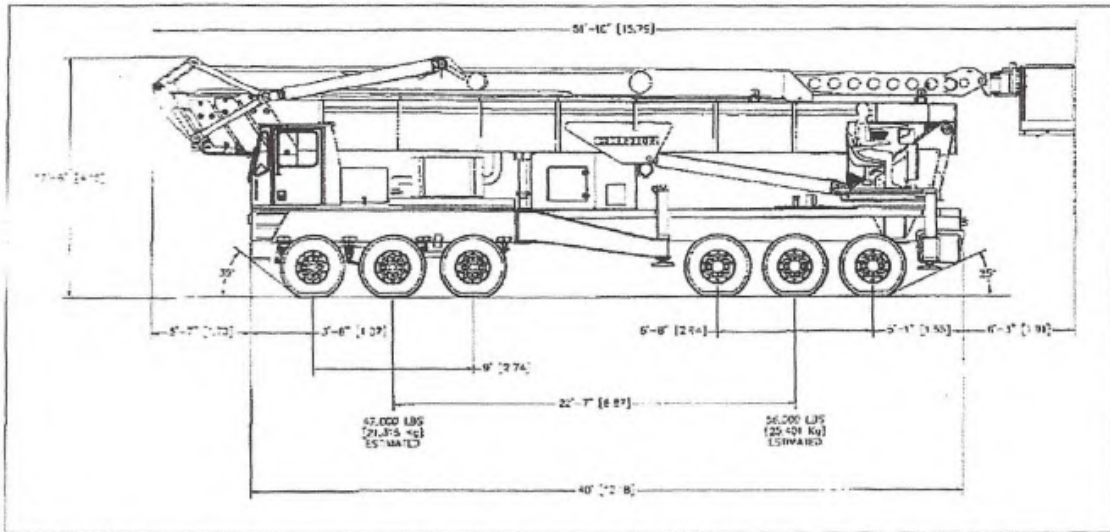


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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-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
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

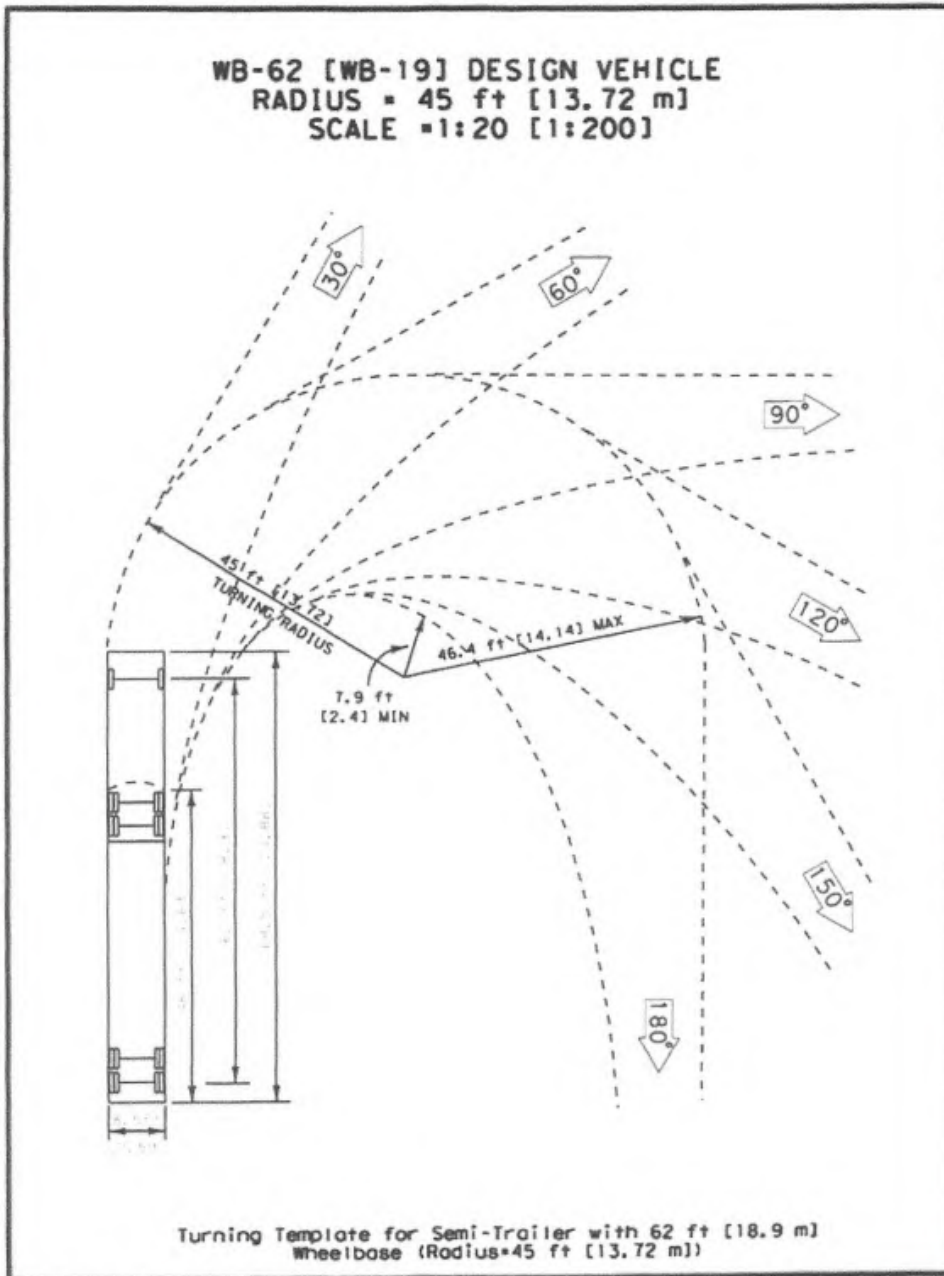
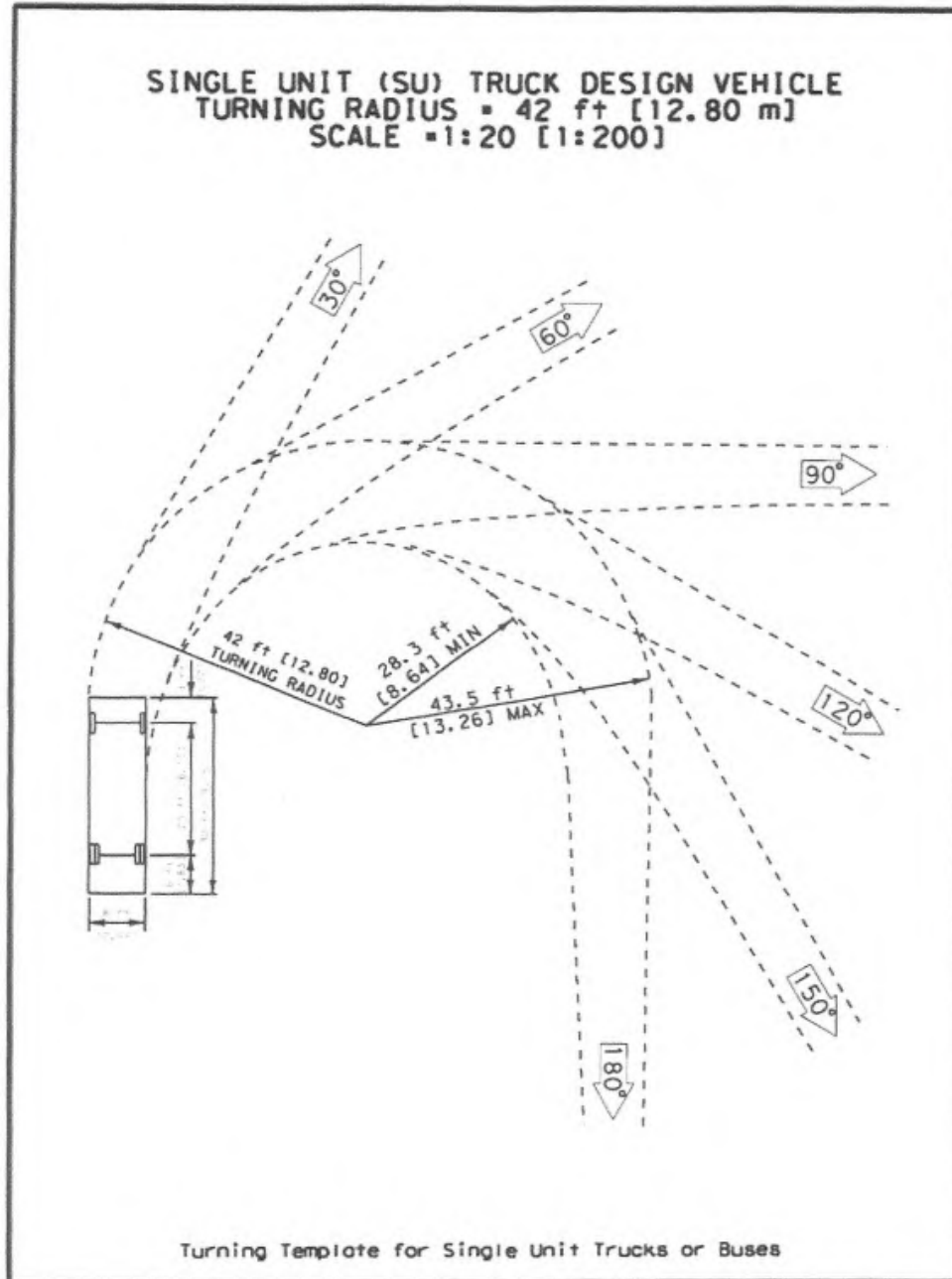


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14



**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.

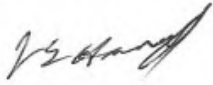
Section 17. TRUCK ROUTES

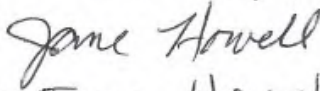
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

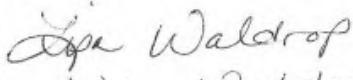
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

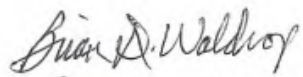
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

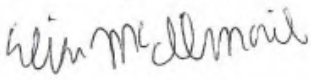
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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
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 mcilmil151@hotmail.com


I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

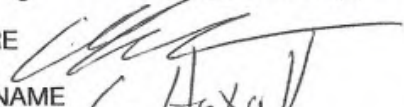

Jessie Huxell
472 Modelaire Dr. LaGrande OR 97850

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

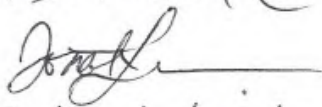

Chris Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL


Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

Marie Skinner
Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

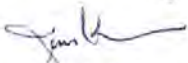
ADDRESS

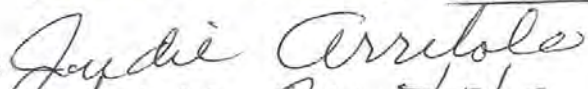
EMAIL

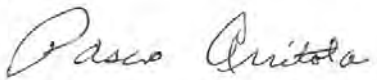
Blake Bars
Blake Bars
1101 G Ave La Grande
blakebars@gmail.com


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 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

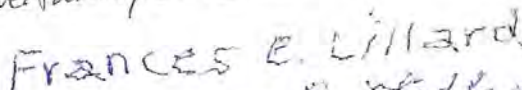
SIGNATURE 
PRINTED NAME Judie Arritola
ADDRESS 603 Modelaire La Grande OR
EMAIL jtol@charter.net


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

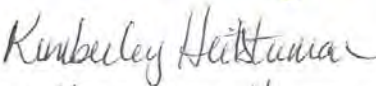
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SIGNATURE 
PRINTED NAME Andrea Galzow
ADDRESS 486 Hawthorne DR, La Grande
EMAIL foreverfamily33@aol.com


SIGNATURE 
PRINTED NAME Frances E. Lillard
ADDRESS 477 Madelaine Dr. L.G.
EMAIL

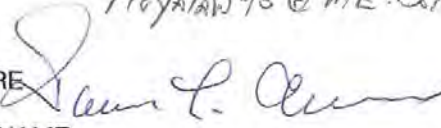
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

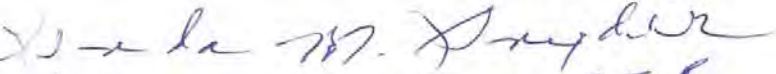
SIGNATURE 
PRINTED NAME M. Jeannette Smith
ADDRESS 410 Allium Street
EMAIL jeannetterampton@gmail.com

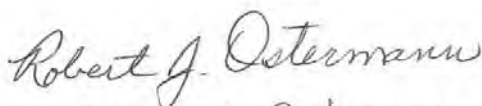
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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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

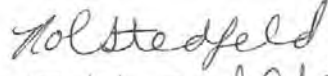
SIGNATURE 
PRINTED NAME Linda Snyder
ADDRESS 491 Modelaire
EMAIL

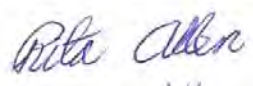
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ADDRESS 495 Modelaire Dr. La Grande, OR 97850
EMAIL

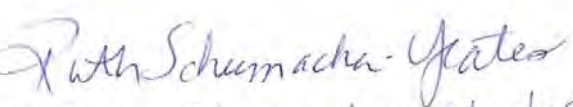
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PRINTED NAME Robin J. Ostermann
ADDRESS 495 Modelaire Dr La Grande, OR 97850
EMAIL

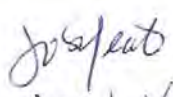
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SIGNATURE 
PRINTED NAME Jonathan D. White
ADDRESS 485 Modelaire Dr
EMAIL jondwhite418@gmail.com

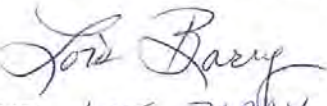
SIGNATURE 
PRINTED NAME Robin Stedfeld
ADDRESS 485 Modelaine Dr. La Grande
EMAIL rstedfeld@yahoo.com

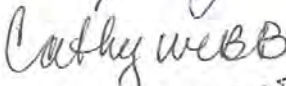
SIGNATURE 
PRINTED NAME Rita Allen
ADDRESS 410 Balsa St. La Grande Or.
EMAIL

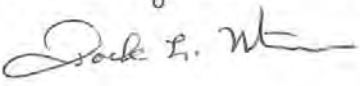
SIGNATURE 
PRINTED NAME Ruth Schumacher Yeates
ADDRESS 408 Sunset Drive La Grande, OR 97850
EMAIL ruthschumacheryeates@gmail.com

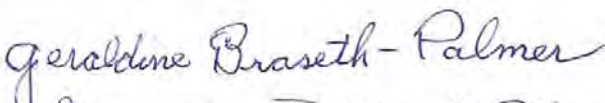

SIGNATURE 
PRINTED NAME JOHN YEATES
ADDRESS 408 SUNSET DR. LA GRANDE, OR 97850
EMAIL jyeates52@gmail.com


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SIGNATURE 
PRINTED NAME Lois BARRY
ADDRESS P.O. Box 566, La Grande, OR 97850
EMAIL loisbarry31@gmail.com

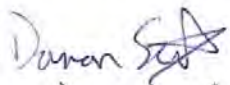
SIGNATURE 
PRINTED NAME CATHY WEBB
ADDRESS 1708 Cedar St. LAGRANDE, OR 97850
EMAIL hunkski@gmail.com


SIGNATURE 
PRINTED NAME Jack L. Martin
ADDRESS 1412 Gilcrest Dr. LaGrande
EMAIL Buff Martin 27 @GMail .com

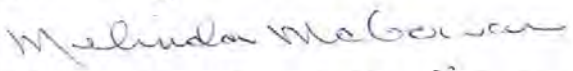
SIGNATURE 
PRINTED NAME GERALDINE BRASETH-PALMER
ADDRESS 1602 Goldenest Drive LA GRANDE, Ore 97850
EMAIL 


SIGNATURE 
PRINTED NAME Jean BAPH
ADDRESS 1509 MADISON AVE LaGrande, OR 97850
EMAIL Jbaph19@gmail.com

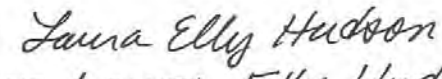
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SIGNATURE 
PRINTED NAME Damon Sexton
ADDRESS 401 Balsa St La Grande, OR 97850
EMAIL Sexton.damon@gmail.com

SIGNATURE 
PRINTED NAME Cory Sexton
ADDRESS 401 Balsa Street La Grande OR 97850
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
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EMAIL acavinat@eou.edu

SIGNATURE *Joe Horst*
PRINTED NAME JOE HORST
ADDRESS 86 HAWTHORNE DR. LA GRANDE OR
EMAIL joehorst@eoni.com

SIGNATURE *Angela Sherer*
PRINTED NAME ANGELA Sherer
ADDRESS 91 - W. Hawthorne Dr. LaGrande, OR 97850
EMAIL asherer@frontier.com

I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE *Robert J. Sherer*
PRINTED NAME Robert J. Sherer
ADDRESS 97 W Hawthorne Dr, LaGrande, Or. 97850
EMAIL asherer@frontier.com

SIGNATURE *Heather M. Null*
PRINTED NAME Heather M. Null
ADDRESS 492 Modelaire Dr. La Grande, OR 97850
EMAIL hnull@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
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.

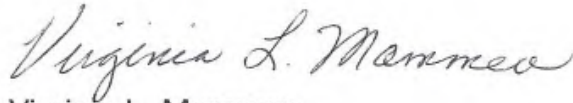
In Exhibit X page X-9 3.3.1.1 2 blasting and rock breaking is mentioned saying that "Modern blasting techniques include the electronically controlled ignition of multiple small explosive charges in an area of rock that are delayed fractions of second, resulting in a total event that is generally less 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,

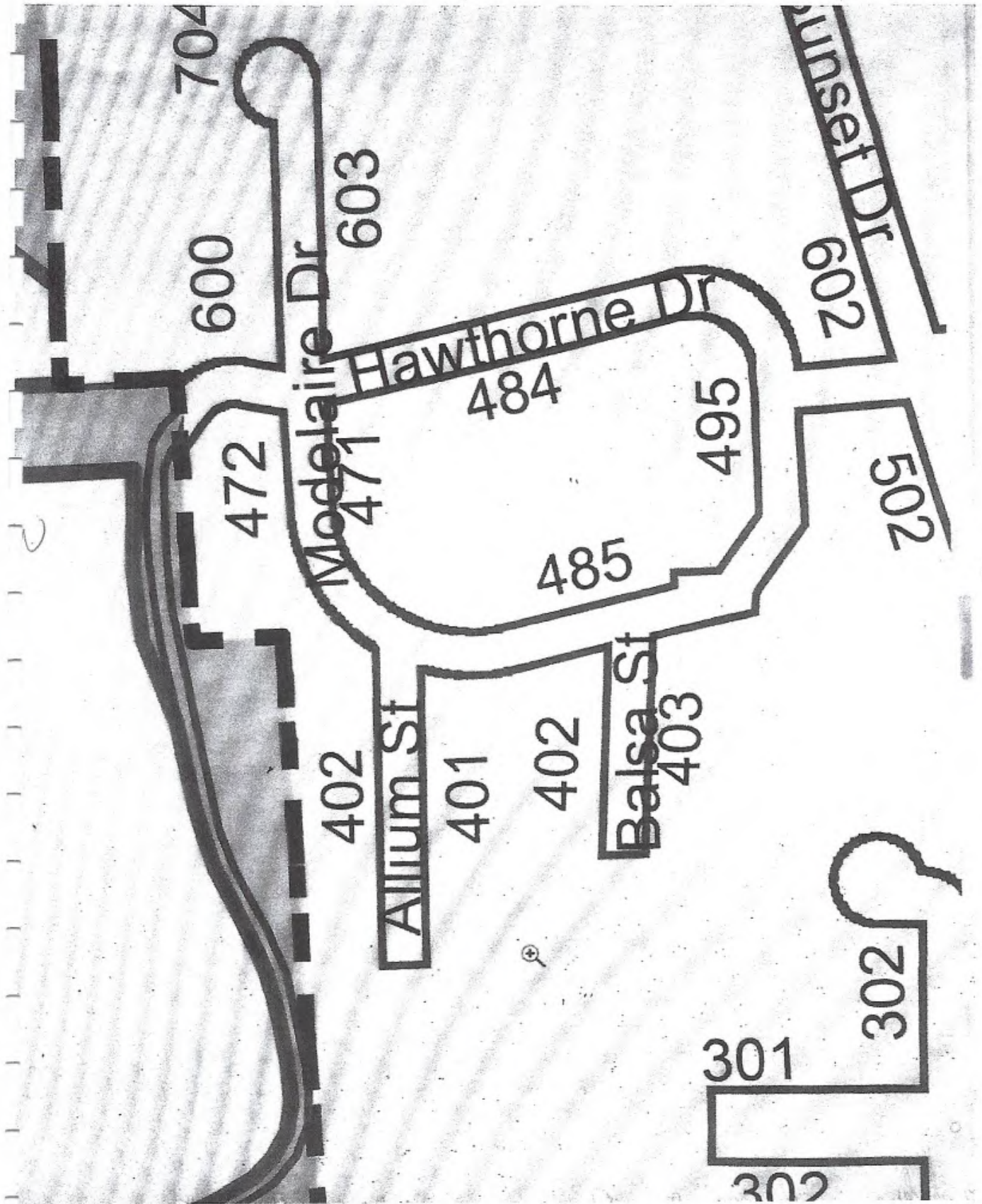


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Exhibit 1

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.

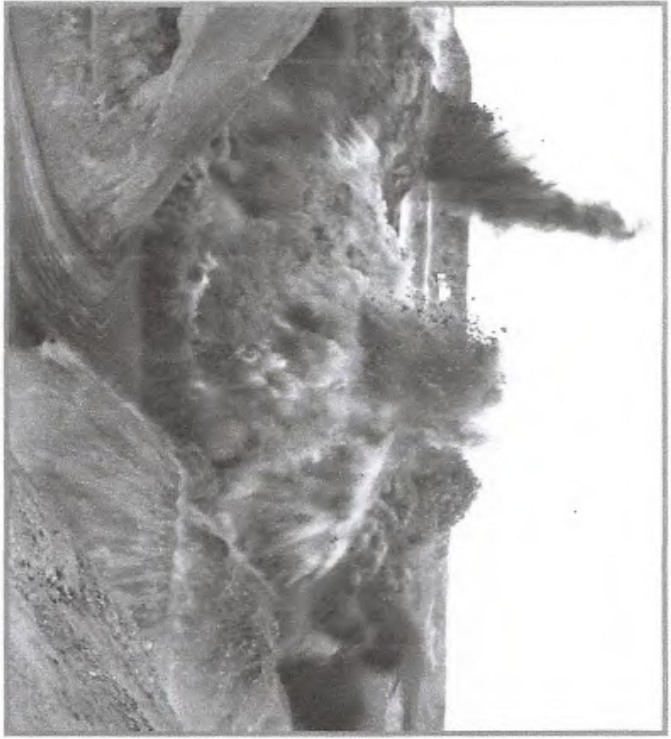
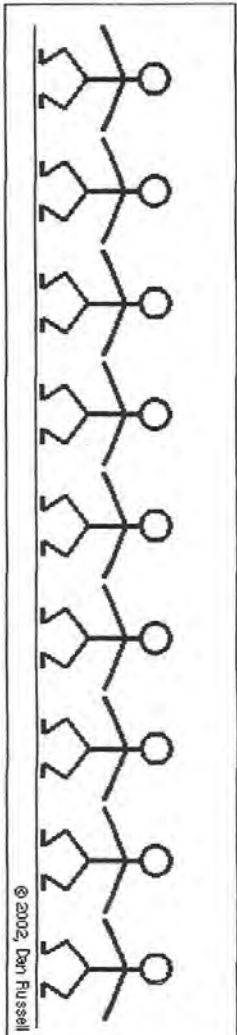


Exhibit 5b

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.

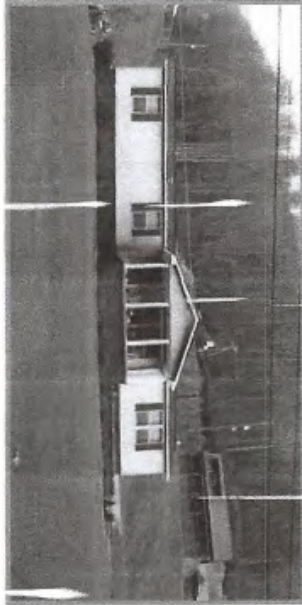
Flyrock is debris ejected from the blast site that is traveling through the air or along the ground. Flyrock the single most dangerous adverse effect that can cause property damage and personal injury or death.



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

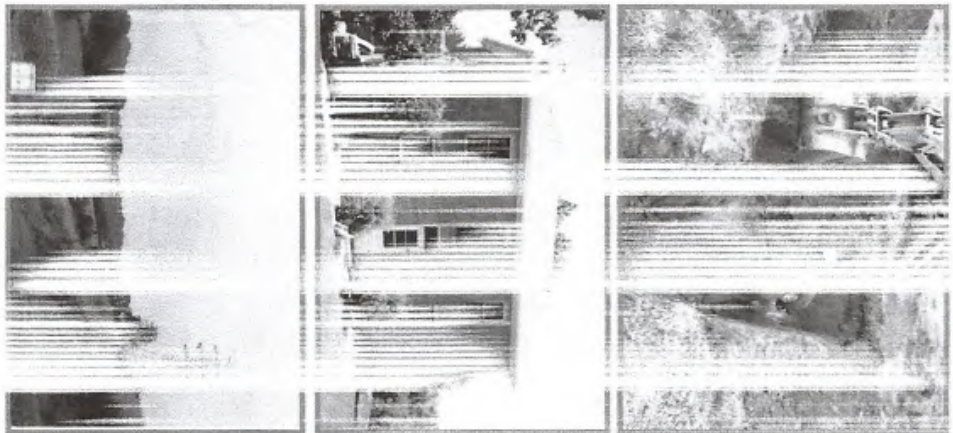
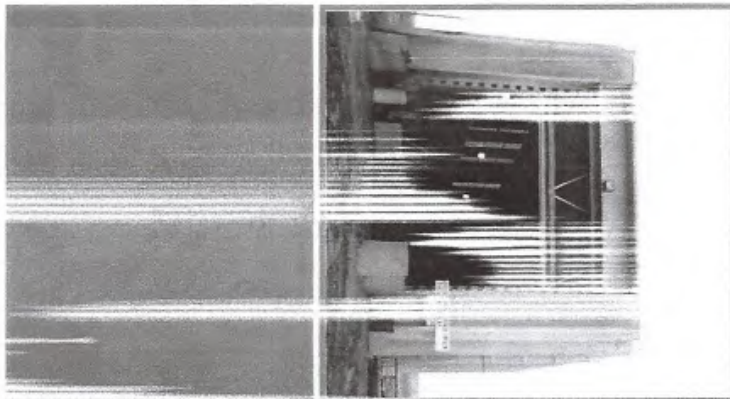
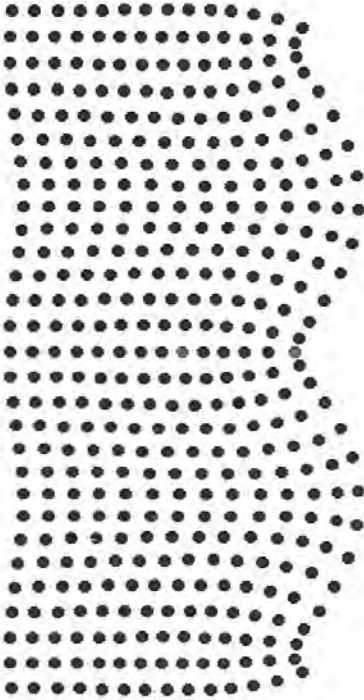


Exhibit 5D

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.

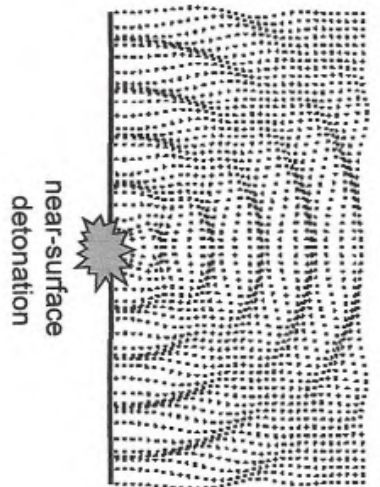
At typical blasting distances from residential structures, the ground only moves with displacements equal to the thickness of a piece of writing paper. In terms of displacement, this equates to hundredths of an inch; visually, such movement cannot be detected.

Airblast

Exhibit 5 e

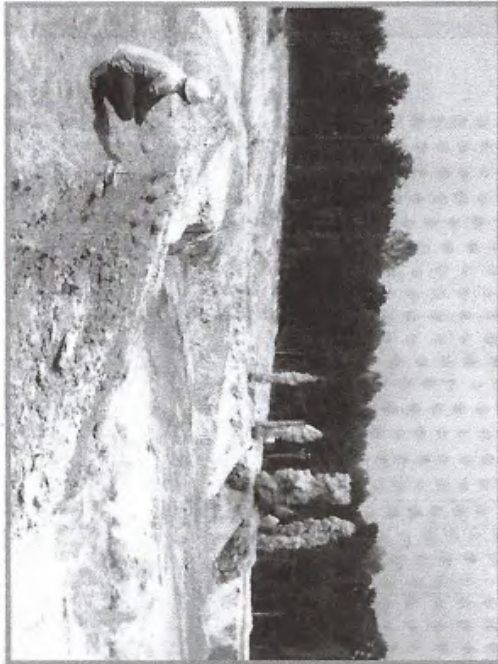
Airblast is measured as a pressure in pounds per square inch (psi) and is often reported in terms of **decibels (dB)**.

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.



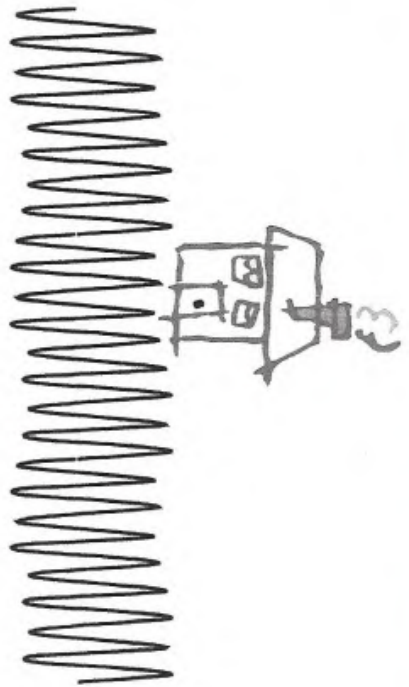
Airblast radiates outward from the blast site in all directions and can travel long distances. Sound waves travel much slower (1,100 ft/s) than ground vibrations (about 5,000 – 20,000 ft/s). Hence, airblast arrives at offsite structures later than do ground vibrations.

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.



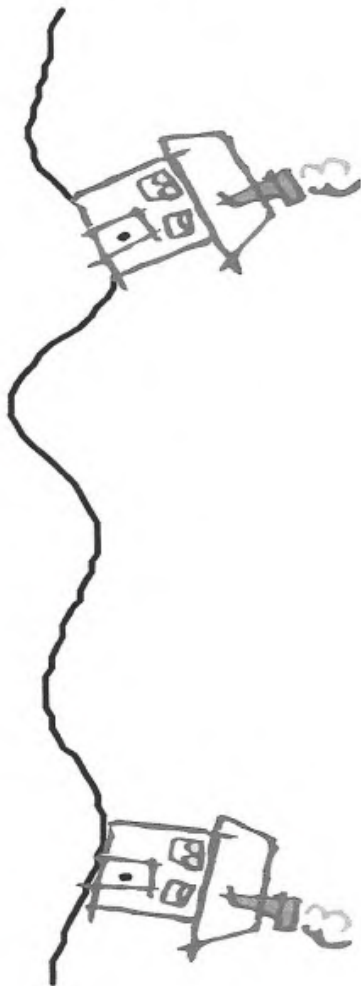
Ground Vibration Structure Response

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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CANCER

DISEASES &
CONDITIONS

MEN'S
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



(<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



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Does noise affect learning? A short review on noise effects on cognitive performance in children

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Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

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

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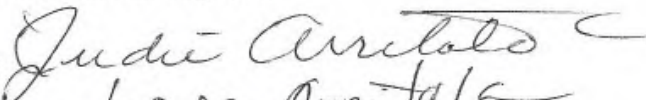


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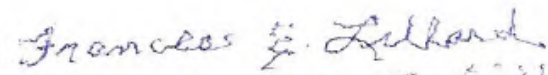
[Parents Seek Help: Child with Severe Autism Eats Only Sweets](#)


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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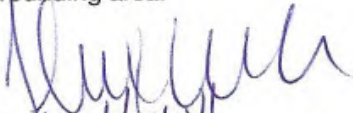
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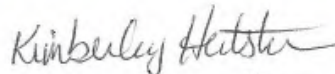
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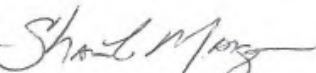
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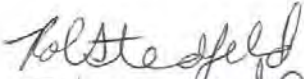
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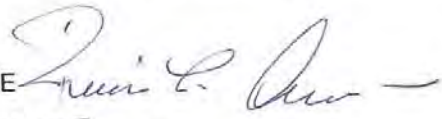
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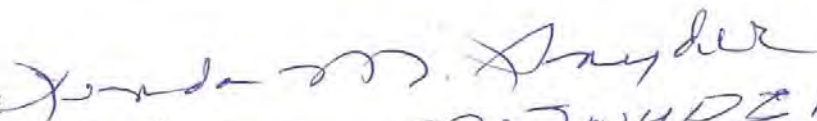
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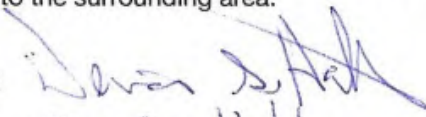
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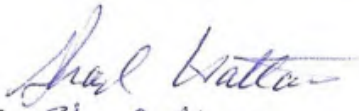
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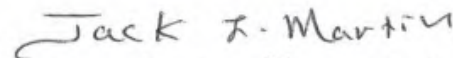
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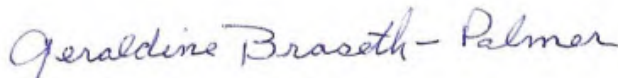
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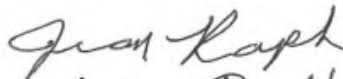
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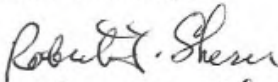
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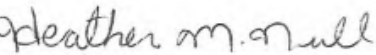
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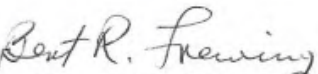
SIGNATURE *Caroline Kaye Juniper*
PRINTED NAME Caroline Kaye Juniper
ADDRESS 406 4th Street - LaGrande - OR 97850
EMAIL

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 
PRINTED NAME Robert J. Sherer
ADDRESS 97w Hawthorne Dr, La Grande, OR 97850
EMAIL asherer@frontier.com.

SIGNATURE 
PRINTED NAME Heather M. Null
ADDRESS 492 madelaire Dr. La Grande, OR 97850
EMAIL hnull@coni.com

SIGNATURE 
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) Laurie Schlitz

Mailing Address (mandatory) PO Box 1110
42877 Sunnyslope Road Baker, OR 97814

Phone Number (optional) () _____ Email Address (optional) laurie@thegeo.net

Today's Date: June 19 2019

Do you wish to make oral public testimony at this Hearing: Yes No not first! have photos

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 below the Interpretive
Center We have Oregon Trail on
our property. We already bear the
burden of the 230V Line.

Page 46

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

Page 47

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

Page 48

1 on with the Interpretive Center, which is a beautiful
2 museum -- and if you people are not from here, I would
3 highly recommend you going there. It is so inspiring.
4 I cry every time I go. This bump is the Interpretive
5 Center. So this is looking east. The Interpretive
6 Center looks west, which is the towers are going to come
7 up, supposedly not be able to be seen, under the
8 Interpretive Center.
9 So we have about 300 acres. We already bear,
10 our particular property already bears the burden of the
11 high-voltage 230 line. That was placed in 1950. That
12 line, they gave my ancestors, who thought it was a good
13 idea to help get electricity, a little bit of money.
14 However, 60 years later, we still have the line on our
15 property. It impacts our ability to do crops, it
16 interrupts our grazing. They were sagging close to the
17 ground. My husband was in jeopardy on his tractor this
18 last year. There's not much maintenance that goes on
19 with these lines.
20 So the B2H, and you've already heard about the
21 right-of-way difficulties that are going to be expected.
22 We've already had impact from the B2H; people, they've
23 entered our land without permission, claimed ignorance,
24 they drive on our property, they've flown over with
25 helicopters, interrupted the cattle. So we've already

Page 49

1 experienced disturbance. And everyone claims ignorance,
2 Oh, we didn't mean to do that. Well, we didn't think,
3 and so forth. But it happens, and we are the ones that
4 bear that burden.
5 Well, I guess I ran through all my thoughts.
6 Any questions?
7 HEARING OFFICER WEBSTER: Do you want to leave
8 the photos?
9 MS. LAURIE SOLISZ: I would.
10 And if you have any questions, you can always
11 ask.
12 HEARING OFFICER WEBSTER: Any questions,
13 Council? Thank you.
14 MS. LAURIE SOLISZ: Thank you for listening.
15 Thanks for coming.
16 HEARING OFFICER WEBSTER: We will next, after
17 we hear from you, we will hear from Wayne -- is it
18 Kaaen?
19 MR. WAYNE KAAEN: You're doing good on the
20 names.
21 HEARING OFFICER WEBSTER: Thank you.
22 MR. GAIL CARBIENER: My name is Gail
23 Carbiener. I live in Bend, Oregon, on 2920 Northeast
24 Connors Avenue. I represent the Oregon-California
25 Trails Association. I have been before the Council

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

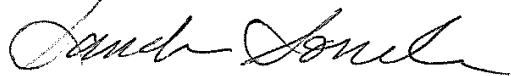
limited and volunteer. In their application, Idaho Power avers, "Most of the fire districts within the analysis area comprise volunteers, and in some cases, it takes considerable time to collect and mobilize an entire fire crew." As well, JB Brock, Union County emergency Manager states in Idaho Power's 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 Sandra Sorrels
Address 402 Main Ave

ESTERSON Sarah * ODOE

From: ssovern@hotmail.com
Sent: Wednesday, August 21, 2019 2:13 PM
To: B2H DPOComments * ODOE
Subject: B2H comments
Attachments: B2HSovern.pdf

Please see attached.

Thanks

Stan

August 21, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St, N.E.
Salem, OR 97301

Sent Via 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.

RE: Endangered Fish in Ladd Creek and Tributaries, Union County

Dear Chair Beyeler and Members of the Energy Facility Siting Council:

I am writing in regards to the proposed Boardman to Hemingway Transmission Line Project (B2H). This letter outlines a deficiency in Idaho Power's application documents concerning anadromous fish passage. I request that my letter be entered into the permanent written record. I also request response to, and resolution of, the issues I raise herein.

Both of the proposed routes in Union County for the Boardman to Hemingway Transmission Line project include a crossing of the Ladd Creek and/or its tributaries. Ladd Creek flows approximately 14 miles through the Wallowa Whitman National Forest and private land on the east side of the Blue Mountains, into the Ladd Marsh Wildlife area, connecting with Catherine Creek and the Grande Ronde, Snake, and Columbia Rivers.

Historically, there were anadromous fish (steelhead and salmon returning from the ocean) in Ladd Creek. ODFW has documented that steelhead and salmon used Ladd Creek for spawning. However, construction of Interstate 84 in the 1970's stopped the passage of these fish above the interstate due to a vertical culvert being installed (see attached Power Point "Ladd Creek Fish Passage Project - ODOT FTP").

The Oregon Department of Fish and Wildlife's mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. The department is the only state agency charged exclusively with protecting Oregon's fish and wildlife resources. The state Wildlife Policy (ORS 496.012) and Food Fish Management Policy (ORS 506.109) are the primary statutes that govern management of fish and wildlife resources.

The B2H Draft Proposed Order (pages 9-10 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*), states that Ladd Creek and its tributaries contain only local fish (trout), but that status has changed due to major culvert work along and under the I-84

interstate in the last 4 years. As a result, the information contained in the B2H Draft Proposed Order is incorrect and out of compliance with Oregon and Federal statutes.

In 2015, ODOT completed a 2-year project to replace culverts that previously had blocked fish passage in the creek and at the I-84 crossing of Ladd Creek (see <https://www.lagrandeobserver.com/csp/mediapool/sites/LaGrandeObserver/LocalState/story.csp?cid=4108250&sid=824&fid=151>).

According to ODFW Fish biologist Tim Bailey, in the year after completion of the fish passage project (2016) a steelhead redd was documented above the culvert, upstream from the freeway.

ODOT has continued this fish passage project in 2019 along with plans for freeway reconstruction and additional traffic lanes (see <https://www.constructionequipmentguide.com/odot-works-to-improve-i-84-fish-passage-in-ladd-canyon/45648>). Construction projects have resulted in costs above 32 million dollars, and the list of agencies and individuals in support of this costly fish passage project include ODFW, Union County Board of Commissioners, The Grande Ronde Model Watershed, the US Army Corps of Engineers, Senator Jeff Merkley, Senator Ron Wyden, and the National Marine Fisheries Service (see <https://www.oregon.gov/odot/projects/pages/project-details.aspx?project=20381>) and attached ([PPT]Ladd Creek Fish Passage Project - ODOT FTP).

An entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power in its application and the B2H Draft Proposed Order have failed to incorporate information regarding identification of the habitat category or locations which will be impacted by the proposed B2H powerline development. Critical habitat is specifically identified in the federal law recording the listing of threatened species. The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for listed species (salmon and steelhead).

Idaho Power has two proposed line routes across and through Ladd Canyon, a preferred and an alternative. Idaho power has also stated that because there are only resident fish in Ladd Creek, that "No new fish passage plan anticipated" (page 9-11 of *draft Fish Passage Plan in ASC Exhibit BB, Attachment BB-2*).

Because the alternative route through Ladd Canyon would necessitate a 3a/3b design change for a bridge crossing on Ladd Creek and there are threatened anadromous fish in Ladd Creek, an ODFW fish passage plan will need to be implemented (OAR 17 412-0035) based on (OAR) 635-412-0020 for this route for Ladd Creek and its tributaries.

In conclusion, the B2H DPO contains improper evaluation of the potential long term negative impacts on fish habitat in the Ladd Creek drainage, including tributaries. The Endangered Species Act requires identification and evaluation of effects of the proposed action through ESA section 7(a)(2) consultation with NMFS (anadromous fish

species). Federally protected anadromous species are currently present in Ladd Creek, and its tributaries.

Idaho Power's B2H DPO is not in compliance with State or Federal Protected Species laws. The applicant has failed to meet the requirements for issuance of a Site Certificate contained in OAR-345-022-0080. Therefore, issuance of a Site Certificate should be denied.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Sovern', with a long horizontal flourish extending to the right.

Stan G. Sovern
404 Walnut Street
La Grande, OR 97850
509-899-4494
ssovern@hotmail.com

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 Eleanor Spangler

Mailing Address: 803 Main Ave.
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) Ellie Spangler

Mailing Address (mandatory) 803 Main Avenue
La Grande, OR 97850

Phone Number (optional) () _____ 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.)

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 112/4; 113/1 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. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 112/4; 113/1 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 21 of 44:

Table B3: Soil Descriptions, described as:

56E 56F, erosion hazard; severe; percent of slope Low; 35; High; 70. (sheet 2 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 42

112/4 – Slope Stability/Landslide; Geo-Seismic Hazard.

113/1 – Slope Stability/Landslide; Geo-Seismic Hazard.

E.2.11 SLIDO 115

SLIDO-3.4 FernML2010_115 Northing: 5010654 Easting: 418706 Sheet 13

SLIDO 115 is referenced at a scale of 1:100,000 (Ferns et al., 2010), and its mapped extents intersect the IPC Proposed Route between towers 112/5 and 113/1. The feature is mapped as an alluvial fan, not a landslide; and the material appears to be contained within a drainage spanned by the two towers. The feature is unlikely to affect the proposed towers or the associated work 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 112/4; 113/1** 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 112/4; 113/1, 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: *Katherine Spangler* 

Address: *1503 Monwe Ave, LG 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 110/2; 110/3 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. 3990 Collins Way, Suite 100, lake Oswego, Oregon. 97035.

Drill sites 110/2; 110/3 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 21 of 44:

Table B3: Soil Descriptions, described as:

56E 56F, erosion hazard; severe; percent of slope Low; 35: High; 70. (sheet 2 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 39 & 40

110/2 -- Angle change along alignment Slope Stability/Landslide; Geo-Seismic Hazard; Fault crossing.

110/3 -- Slope Stability/Landslide; Geo-Seismic Hazard.

E.2.10 SLIDO 225

SLIDO-3.4 Fern ML2010_225 Northing 5010654 Easting 419492 Sheets 13,14

SLIDO 225 is mapped as a landslide referenced at a scale of 1:100,000 (Ferns et al., 2010). It intersects the IPC Proposed Route between 110/2 and 112/2. And may affect stability at towers 110/1 through 112/1 along with associated work 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 110/2; 110/3** 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 110/2; 110/3, 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: *Remy Spangler*

Address: *1201 8th St Apt B La Grande OR*

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 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: Robin Spangler

Mailing Address: 1311 0 Ave, La Grande, OR 97850 #5

Email:

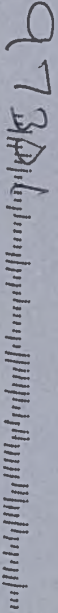
1112 1/2 Adams Ave
La Grande, OR 97850

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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

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

B2H EFSC LACK OF DOCUMENTATION FOR GREAT GRAY OWL AND FLAMMULATED OWL

The surveys provided for these two species are too old to be a reliable indicator of the presence or impacts to these bird species. They were done in 2011 and 2012, seven years ago. On Page P1-9, Table P1-1 the applicant proposes doing updated surveys only on areas not previously surveyed and submitting them to only ODOE. This type of secretive procedure where the public is completely removed from any opportunity to comment or review the decisions being made by ODOE is the basis for a great deal of public dissatisfaction with the process currently being supported by ODOE and EFSC.

There is no current information in the application to base any decision regarding what the impacts will be to these birds as a result of the Boardman to Hemingway Transmission Line. A site certificate cannot be issued determining compliance with OAR 345-022-0060 without knowing what the use of the area is by wildlife. In addition, since habitat category must include the use of the habitat by species, the habitat categories cannot be determined until the developer provides the necessary current information. Given that the area of the Ladd Marsh Wildlife area is not only protected, but also contains both federal and state mitigation areas, it is not possible to determine whether or not the development will have unacceptable impacts to these mitigation sites absent information regarding the use of the adjacent habitat by wildlife utilizing the mitigation sites and whether or not the habitat will be compromised making it unsuitable for use of the species due to impacts of the development. Considering the lack of information near Ladd Marsh Wildlife area, one must question why.

Ladd Marsh is an important Migratory Bird Flyway according to the Oregon Department of Fish and Wildlife (ODFW 2008.) The Audubon Society lists it as an Important Bird Area. The number of bird species using this area has expanded in the last several years, however, in 2008 over 230 species of birds had been recorded on LMWA and over 120 species nest in the area and yet the developer appears to be ignoring the importance of not only the wildlife area, but also the habitat surrounding the wildlife area which is critical to the survival of birds moving in and out of the mitigation sites.

Trinity Spry

Signature/Name

Address:

1009 Forest Ct Lagrange OR 97850

TARDAEWETHER Kellen * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Tuesday, August 13, 2019 7:41 AM
To: B2H DPOComments * ODOE
Subject: IPC's B2H project

Kellen Tardaaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E.
Salem, OR. 97301

August 13, 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

Idaho Power's construction of this power line is putting our community at risk! Specifically, 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,

Louise Squire

Name: Louise Squire

Address: 2105 Oak St.
La Grande, Oregon 97850

--

"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

ESTERSON Sarah * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Tuesday, August 20, 2019 12:33 PM
To: B2H DPOComments * ODOE
Subject: IPC's B2H project

August 20, 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!

_Louise Squire
Signature
Printed name: Louise Squire

Mailing address: 2105 Oak St, La Grande, Oregon 97850

Email address: squirrel@eoni.com
phone number: (optional)

--

"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

ESTERSON Sarah * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Tuesday, August 20, 2019 12:37 PM
To: B2H DPOComments * ODOE
Subject: B2H Letter

August 20, 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,

 Louise Squire _____
Signature

Printed Name: Louise Squire

Mailing Address: 2105 Oak St, La Grande, Oregon 97850

Email: squirrel@eoni.com

--

"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

ESTERSON Sarah * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Tuesday, August 20, 2019 12:45 PM
To: B2H DPOComments * ODOE
Subject: B2H DPO comment

August 20, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Siting Senior Analyst Oregon Department of Energy
550 Capitol St. N.E.
Salem, OR 97301

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Re: Geological Hazards and Soil Stability; Exhibit H.

Re: Geologic Hazard Protection - Drill site 95/3 and 95/4 on unstable and steep slopes in an active seismic zone My comment addresses the danger that construction and operation of an additional transmission line in an active seismic zone presents to the public, both local area residents and travelers on the nearby Interstate 84.

The relevant standard is the 345-022-0020 Structural Standard:

“(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;”

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

The construction process is described in detail in 3.9 Mitigation of the Exhibit H of IPC's ASC. Specifically, the area at or near Drill site 95/3 and 95/4 is shown and described on the following tables and maps:

Exhibit H – Attachment H-1 Appendix B Soils Data Tables and Maps by Shannon & Wilson, Inc.:

Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. Sheet 3 of 4

Exhibit H – Appendix C: Summary of Proposed Boring Locations:

Map Sheet 36 - Drill site 95/3 and 95/4

Exhibit H – Table C1: Summary of Proposed Borings – Sheet 2 of 8

95/3 – cited for Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 – cited for Angle change along alignment; Road and railroad crossing Exhibit H - Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5,6

"PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program."

The relevant standard is the 345-022-0020 Structural Standard:

"(c) The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soils hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility;"

(d) The applicant can design, engineer and construct the facility to avoid dangers to human safety and the environment presented by the hazards identified in subsection (c).

The applicant has not fully described the risks of heavy construction in this area. What mitigation methods would be required to place earthquake resistant towers on unstable slopes, in an active seismic zone, if the area suffered an earthquake of the intensity that formed these slopes.

Special Paper 6, included on the DOGAMI website, describes an extensive study done in 1979 by the Geoscience Research Consultants in Moscow, Idaho and State of Oregon Department of Geology and Mineral Industries on the seismic history of the Blue Mountains and the La Grande area. The introduction of this paper is closes as follows: "In summary, consistencies of structural trends, compatibility of the Blue Mountain folding to backslope faulting in the La Grande area and systematic distribution in the orientation of linear trends favor northwesterly compression as the tectonic control in the study area. Furthermore, the general lack of interference, or lateral offset of linears or of any of the intersecting faults, as is discussed in the next sections, suggest that all of the post-Columbia River Basalt Group structures in the area near La Grande have been created in response to only one major tectonic episode."

Further in the same paper "The Graves Creek-Rock Creek-Coyote Creek area has the greatest density of faults within the study area. At least six major and several minor northwest-trending faults of the Rock Creek fault system occur in the area (Plate 1). The Graves creek fault can be traced from the eastern edge of Sec. 7, T35S, R37E to the southern boundary of the Hilgard 7 ½ - minute quadrangle, a distance of about 6 mi (10 km). The Graves Creek fault probably extends farther southeastward beyond the map area. Offset across this fault is 265 ft (80 km) in Sec. 34, T 35S, R37E."

The IPC ASC to the EFSC (Exhibit H – Attachment H-1, page 28) includes the following brief description of the area: The Mt. Emily Section (802) is described as "an 18 mile fault, forming a steep range front from Thimbleberry Mountain to the mouth of the Grande Ronde River Canyon, by Personius, compiled by the U.S. Geological Survey website and assessed in 11/16/2016."

"The West Grande Ronde Valley fault zone may be active. Subtle topographic features indicate that there may have been earthquakes that broke through the ground surface as recently as the last 10,000 years.

Previous studies indicate that the West Grande Ronde Valley fault is capable of generating a magnitude 7 earthquake." From Summary of the La Grande Quadrangle Geology" also on DOGAMI website.

DOGAMI recommendations for protection of the Portland's infrastructure HUB in the secondary flood zone of a possible Cascadia Subduction Fault earthquake/tsunami have been largely unimplemented for lack of funding, as is the ShakeAlert system which, unless funded will not be available in Oregon until 2021 at the earliest. ShakeAlert is an early warning system being developed by USGS. Oregon made national news when "Governor Brown signed HB 3309, which amended the previous law to no longer prohibit the construction of building such as hospitals and schools and other emergency-preparedness centers in tsunami inundation zones along the coast.

The bill had bipartisan support and bucked standards held for twenty-five years keeping those facilities out of harm's way should a massive tsunami hit." Wisely, some cities along the coast continue following original DOGAMI assessments and recommendations concerning new infrastructure built away from the inundation zone. How this will impact funding assistance to move the existing schools, hospitals, city halls and emergency services?

Clearly Oregon legislative priorities have moved away from seismic hazard emergency preparedness, but this potential hazard to the area brings with it considerable risks, despite the proposed construction "mitigation" methods. It is within the EFSC's judgment to decide against adding an additional hazard to the natural and infrastructure hazards the citizens of this area already live with.

There are dangers both to human safety and the environment with an additional transmission line in a possibly quite seismic area, so close to the heavily traveled I84 transportation/utility corridor, the Hilgard Junction State Recreation

Area and the Grande Ronde river. Further study and subsequent intrusive construction will not reduce the risks to the safety of the travelers through this canyon or the residents of the valley nearby. The application does not comply with the relevant standard.

Remedies:

Additional study of the probable seismic hazards; including ground failure, landslide, cyclic softening of clays and silts, etc. as required by OAR 345-022-0020, Rev. subsection 12. "The certificate holder shall design, engineer and construct the facility to avoid dangers to human safety and the environment presented by seismic hazards affecting the site that are expected to result from all maximum probable seismic events. As used in this rule seismic hazard includes ground shaking, ground failure, landslide, liquefaction, triggering and consequences (including flow failure, settlement buoyancy, and lateral spreading), cyclic softening of clays and silts, fault rupture, directivity effects and soil-structure interaction.

Disqualify this route as an unreasonable risk for a site for an additional high voltage power facility and too close in proximity to Hilgard State Recreational Area, and the I84 transportation/utility corridor.

Additional letter of credit dedicated solely for financial restitution necessary to restore potential damage caused by any of the above in an amount sufficient to restore the surrounding environment and infrastructure, both publicly and privately owned.

Thank you for your consideration,

Sincerely,
Louise Squire

Name: Louise Squire
Address: 2105 Oak St, La Grande, Oregon 97850
Email: squirel@eoni.com

References

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"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

ESTERSON Sarah * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Wednesday, August 21, 2019 5:44 PM
To: B2H DPOComments * ODOE
Subject: B2H DPO comment EMF
Attachments: EMF A B2H magnetic fields.docx

The letter below is also sent as an attachment in case that is easier for you.

August 20, 2019

Kellen Tardaewether, Senior Siting Analyst Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
Email: B2H.DPOComments@Oregon.gov

Magnetic Fields from 500 kV line create a public health risk

The Draft Site Certificate allows up to 9mA of exposure. While this is the standard that is being used, it has had no formal review by the statutorily required review committee for at least 15 years or longer. ORS 469.480(4) states, "The council by rule shall form an Electric and Magnetic Field Committee which shall meet at the call of the council chair. The committee shall include representatives of the public, utilities, manufacturers and state agencies. The committee shall monitor information being developed on electric and magnetic fields and report the committee's findings to the council. The council shall report the findings of the Electric and Magnetic Field Committee to the Legislative Assembly." This requirement is repeated in OAR 345-022-0000.

In spite of the clear legislative and rule requirement, the Oregon Department of Energy and Energy Facility Siting Council have refused to establish this committee in spite of a specific request that they do so. The standard has not been reviewed for over a decade, in spite of the fact that it is one of the highest in the nation and the world for residences. The last time there was any consideration, it was not as a result of a multi-expertise group, but was conducted by a single person, Dr. Kara Warner. She clearly recommended that the committee should be meeting on an ongoing basis in her report.(EFSC 2009).

The Oregon Department of Energy and EFSC continue to make unilateral decisions in spite of the fact that they do not have the expertise represented by the stakeholders required by the legislature to be reviewing this issue and in spite of the mounting evidence indicating this standard is too high. For example, the National Electric Safety Code limits workplace exposure to 5 mA and the National Radiation Laboratory states workplace limits should not be used for the public. The limits need to be lower due to potential prolonged exposure, and different ages, health, etc. They indicate induced current should not exceed 2 mA for public exposure.

The following is a testimonial by a friend who has become an Electro-sensitive person. She has had to move because of this new sensitivity.

"I am 68 years old. When I moved from Salem to a new house in Washougal, Washington in 2018, I quickly, within a month, developed loud ringing in my right ear, nerve pain in my toes, etc. The new house was 1/2 mile from a 6-line, 230 kV high-power transmission line. These symptoms subsided when I left the city. But returned easily when I drove by high-power lines, or was near cell phones, modems, etc. I had become what they call an "Electro-sensitive" person...

Treatment helped greatly, but I sold my house in Washougal in order to move away from the power lines, and I am better. Recently, I visited La Grande.

One day I walked up the end of 12th/Bushnell Street to the top of Glass Hill. The 2nd day I walked along B Street. The ringing in my ears returned and was blasting by the time I finished each walk. I realized that I had been walking 1/4 - 1/2 mile from the 230 line. (The 230 line is the major high power transmission line on the south side of La Grande.) When I returned to my friend's house by Pioneer Park in La Grande, the ringing gradually subsided over a few days.

This pattern has repeated itself in other similar situations. If I was a Resident of La Grande and lived in the area of the proposed B2H line, I would be greatly concerned and would work to safeguard the health of myself and my community."

Natalie Arndt
July 23, 2019

My fear is that people in La Grande would develop electromagnetic sensitivities if a 500kV line is installed on the edge of La Grande and would have to move from their houses to protect their health.

Therefore, due to Natalie's experience and the mounting evidence that a health and safety issue exists due to the large amount of exposure being allowed and the fact that the council has not met the requirements of the statute specifically requiring them to do so, the site certificate cannot be issued. In order to issue a site certificate, the required committee must be brought together, a review of the appropriate amount of exposure needs to occur, and this issue needs to be reviewed based upon credible, current research and standards being used by other agencies and groups.

Louise Squire

Louise Squire
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La Grande, OR
97850

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--

"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

August 20, 2019

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Louise Squire

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RECEIVED

AUG 29 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst
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THE DRAFT PROPOSED ORDER FOR THE BOARDMAN TO HEMINGWAY TRANSMISSION LINE FAILS TO IDENTIFY AND MITIGATE FOR IMPACTS TO CRITICAL HABITAT FOR BULL TROUT OR PROVIDE SITE CERTIFICATE REQUIREMENTS THAT ASSURE THAT THE DEVELOPMENT WILL NOT SIGNIFICANTLY IMPACT THEIR POTENTIAL RECOVERY

Exhibit P, OAR 345-021-0010(1)(p) requires the identification of all fish and wildlife at the proposed location and identification of the habitat classification categories as set forth in OAR 635-415-0025.

This information is necessary in order to comply with the requirements of OAR 345-022-0060 requiring the identification of habitat categories and required mitigation. Bull trout are listed as a Threatened species by the USFWS. While the Oregon Department of Energy has been unwilling to recognize federally listed threatened and endangered species under OAR 345-022-0070, there remains a requirement that they at a minimum demonstrate a robust effort to protect their habitat under OAR 345-022-0060. As a part of the federal determination, critical habitat is identified in the Federal Register, Vol. 80, No. 107, Thursday, June 4, 2015 (Attached). In addition, the Recovery Plan for the Coterminous United States Population of Bull Trout (attached) shows the river sections considered "critical" to the recovery of this fish.

1. Idaho Power need not complete surveys for this threatened fish, or make any determination regarding their presence, or the presence of fish in the watersheds that include critical habitat. The entire watershed is protected when it is determined that it contains federally threatened or endangered fish species. Idaho Power has failed to incorporate information regarding identification of the habitat category or locations which will be impacted by their proposed development in relation to it being Category 1 habitat. Bull trout habitat is known to exist in Malheur, Umatilla, Union and Baker counties and critical habitat is specifically identified in the federal law recording their listing. In addition, the attached document addressed to Representative Greg Barreto from the Oregon Legislative Council Committee, Dated April 20, 2017, regarding the legality of not including federally listed species under OAR 345-022-0070 clearly indicates that in their estimation, so long as they are addressed under OAR 345-022-0060, the State of Oregon would not be out of compliance with the federal law. The current application and site certificate fails to include requirements that would assure that the state is complying with federal laws in providing habitat protection for this listed species.

to the recreational economy of Eastern Oregon and the severe economic damages that will result if the fish category were raised to "Endangered", the information needs to be made available to the impacted counties for their review and comment.

Under the current draft proposed order, Idaho Power does not meet the requirements for issuing a site certificate due to the failure to identify and avoid damages to Category 1 habitat. This conflicts with the habitat mitigation, threatened and endangered species and recreational standard requirements contained in OAR 345-022-0080 as noted above.

Sincerely,

Louise Squire
Louise Squire
2105 Oak St
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Representative Greg Barreto
April 20, 2017
Page 2

patterns, including breeding, feeding or sheltering.⁷ The take prohibition applies to any "person,"⁸ including individuals, businesses and federal, state and local governmental bodies.⁹

Section 10 of the federal ESA provides a mechanism to allow private landowners to take threatened and endangered species "if such taking is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity."¹⁰ A private landowner can avoid potential liability for taking a threatened species by obtaining an incidental take permit (ITP).¹¹ In exchange for permission to "take" a listed species pursuant to an ITP, the permit applicant must commit to implementing a plan that "conserv[es]"—i.e., facilitates the recovery of—the species.¹² This plan is called a Habitat Conservation Plan (HCP) and it must delineate "the impact which will likely result from such taking" and the "steps the applicant will take to minimize and mitigate such impacts."¹³

Oregon State Law

The Oregon Endangered Species Act (Oregon ESA) is far more limited in scope than its federal counterpart.¹⁴ The law provides for the state listing and conservation of threatened and endangered species. The Director of Agriculture or the State Fish and Wildlife Commission (FWC), as appropriate, determines which species are on the state lists.¹⁵ As a result, Oregon's threatened and endangered species lists do not necessarily mirror the federal ESA lists. In fact, it is part of Oregon's stated environmental policy to minimize duplication and overlap between state and federal laws dealing with threatened or endangered species.¹⁶ To that end, unlike the federal ESA which applies to individuals, businesses, and federal, state and local governmental bodies, the Oregon ESA generally focuses only on state lands and state management activities such as permitting.

Passed in 1987, the Oregon ESA underwent revisions that outlined listed species protection requirements in 1995.¹⁷ For threatened or endangered species listed by the state during or after 1996, the FWC is directed to establish by rule quantifiable and measurable guidelines that it considers necessary to ensure the survival of individual members of the species.¹⁸ The guidelines "may include take avoidance and protecting resource sites."¹⁹ If a species is listed as threatened, state agencies are required to determine whether "a proposed action on land it owns or leases, or for which it holds a recorded easement, has the potential to violate the [survival] guidelines established" by the commission.²⁰ If the potential exists, the agency must work with the State Department of Fish and Wildlife (ODFW) to either pursue reasonable and prudent alternatives to the proposed action, or to take other actions to minimize adverse impacts on the affected species.²¹

⁷ 50 C.F.R. 17.3.

⁸ 16 U.S.C. 1538(a)(1).

⁹ 16 U.S.C. 1532(13).

¹⁰ 16 U.S.C. 1539(a)(1)(B).

¹¹ *Id.*

¹² *Id.*; 16 U.S.C. 1539(a)(2)(A); see also *Sierra Club v. U.S. Fish and Wildlife Serv.*, 245 F.3d 434, 441-442 (5th Cir. 2001) ("'[c]onservation' is a much broader concept than mere survival" because the "ESA's definition of 'conservation' speaks to the recovery of a threatened or endangered species.").

¹³ 16 U.S.C. 1539(a)(2)(A).

¹⁴ ORS 496.171 to 496.192.

¹⁵ ORS 496.176 (2), ORS 564.110 (2).

¹⁶ ORS 496.182 (1).

¹⁷ Chapter 590, Oregon Laws 1995.

¹⁸ ORS 496.182 (2)(a).

¹⁹ *Id.*

²⁰ ORS 496.182 (3).

²¹ ORS 496.182 (3), (4).

Representative Greg Barreto
April 20, 2017
Page 4

may be required to apply separately to the Secretary of the Interior for an ITP under section 10 of the federal ESA in addition to the application to EFSC.³²

Despite the EFSC's recent rule change, applicants for energy facility site certificates must continue to identify *all* threatened and endangered species that may be affected by the construction and operation of the proposed facility, regardless of whether those species are listed on the federal or state list. First, the applicant must disclose any affected state listed species to the EFSC in Exhibit Q of its site certificate application.³³ Second, the applicant must identify all additional fish and wildlife species and habitat that may be affected by the project in Exhibit P of the site certificate application, which would include any federally listed species.³⁴ Third, if any of the potentially affected species are listed on the federal endangered or threatened species list, the federal ESA may require the applicant to apply separately to the Secretary of the Interior for an ITP.³⁵ Accordingly, the EFSC's recent rule change does not appear to be in conflict with any applicable federal laws because applicants must still identify *all* fish and wildlife species and habitat that may be affected by the project in the site certificate application. In addition, the federal ESA continues to apply to energy facility site certificate applicants.

2. ORS 183.720 Administrative Rule Review

As a member of the Legislative Assembly, you may request that the Legislative Counsel review an adopted rule of a state agency.³⁶ When reviewing a rule, the scope of review of this office is limited to:

- Determining whether the rule appears to be within the intent and scope of the enabling legislation purporting to authorize its adoption; and
- Determining whether the rule raises constitutional issues other than falling outside of the intent and scope of the law.³⁷

You have asked our office to review OAR 345-021-0010 (1)(q)(A), as amended effective March 8, 2017. OAR 345-021-0010 sets forth specific information that must be provided with applications for energy facility site certificates. Prior to March 8, 2017, OAR 345-021-0010(1)(q)(A) required applications to include:

Information about threatened and endangered plant and animal species that may be affected by the proposed facility . . . [b]ased on appropriate literature and field study, identification of all threatened or endangered species listed under ORS 496.172 (2), ORS 564.105 (2) or 16 USC Sec. 1533 that may be affected by the proposed facility.³⁸

ORS 496.172 (2) refers to Oregon's list of threatened and endangered wildlife species, as identified by the FWC. ORS 564.105 (2) refers to Oregon's list of threatened and endangered

³² 16 U.S.C. 1539(a)(1)(B).

³³ OAR 345-021-0010 (1)(q).

³⁴ OAR 345-021-0010 (1)(p).

³⁵ 16 U.S.C. 1539(a)(1)(B).

³⁶ ORS 183.720.

³⁷ ORS 183.720 (3).

³⁸ OAR 345-021-0010(1)(q)(A) (prior to March 8, 2017).

Representative Greg Barreto
April 20, 2017
Page 6


and state listed threatened and endangered species that may be affected by the proposed facility in Exhibit Q of the site certificate application. Presumably, OAR 345-021-0010 (1)(q) was enacted to require applicants to provide EFSC with the information it needs to comply with OAR 345-022-0070; however, OAR 345-022-0070 does not apply to federally listed threatened and endangered species. Accordingly, in March, the EFSC amended OAR 345-021-0010 (1)(q) to remove the requirement that developers identify federally listed threatened and endangered species in Exhibit Q. Nevertheless, developers must still identify state listed threatened and endangered species in Exhibit Q. Furthermore, developers must still identify any other fish and wildlife species and habitat which may be affected by the proposed project (which would include any affected federally listed species) in Exhibit P of the site certificate application.⁴⁷

The EFSC is tasked with prescribing standards and rules for the siting of facilities under ORS 469.470 and 469.501. The only reference in either ORS 469.470 or 469.501 to endangered or threatened species is in ORS 469.501 (1) regarding the discretionary authority of the EFSC to develop standards regarding the effects of proposed facilities on fish and wildlife, including threatened or endangered species. Accordingly, we believe that the EFSC's removal of the requirement in OAR 345-021-0010 (1)(q)(A) that applicants for site certificates identify federally listed threatened or endangered species in Exhibit Q of the site certificate application meets the EFSC's duties to prescribe standards and rules for the siting of facilities under ORS 469.470 and 469.501 because there is no express statutory requirement that EFSC consider federally listed threatened and endangered species when it issues site certificates. Furthermore, EFSC still requires applicants to identify state and federally listed species on site certificate applications, albeit in different exhibits. For these reasons, we conclude that the rule adopted by the EFSC falls under the broad rulemaking authority of the EFSC, is within the intent and scope of the enabling legislation and does not raise any additional constitutional issues.

The opinions written by the Legislative Counsel and the staff of the Legislative Counsel's office are prepared solely for the purpose of assisting members of the Legislative Assembly in the development and consideration of legislative matters. In performing their duties, the Legislative Counsel and the members of the staff of the Legislative Counsel's office have no authority to provide legal advice to any other person, group or entity. For this reason, this opinion should not be considered or used as legal advice by any person other than legislators in the conduct of legislative business. Public bodies and their officers and employees should seek and rely upon the advice and opinion of the Attorney General, district attorney, county counsel, city attorney or other retained counsel. Constituents and other private persons and entities should seek and rely upon the advice and opinion of private counsel.

Very truly yours,

DEXTER A. JOHNSON
Legislative Counsel



By
Lori Anne Sills
Staff Attorney

⁴⁷ OAR 345-021-0010 (1)(p).

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

RECEIVED

AUG 29 2019

DEPARTMENT OF ENERGY

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

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: Louise Spurre
Mailing Address: 2105 Oak St
La Grande, Or
97850

RECEIVED

AUG 23 2019

DEPARTMENT OF ENERGY

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:

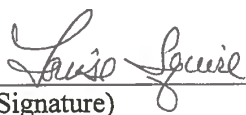
As I understand it, the applicant did not complete noise modeling on multiple noise sensitive properties within ½ mile of the development as required by OAR 340-035-0015(38). In fact, the closest noise modeling was performed at Hilgard, the junction of I-84 and 244, about 8 miles air miles away, with 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: Louise Squire

Address 2105 Oak St
La Grande, Or
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AUG 22 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether, Senior Siting Analyst

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B2H EFSC Exhibit K APPLICANT FAILED TO INCLUDE ALL EFU LANDS FOR PURPOSES OF 215.275 ANALYSIS

Exhibit K, 4.1.1.4 Non-EFU Alternatives

Idaho Power failed to include all farm land in the analysis required by ORS 215.275. Of critical concern are items (4) requiring restoration of agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility.

And (5) requiring that there be clear and objective conditions on the application for utility facility siting to mitigate and minimize 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.

Idaho Power's analysis failed to include lands zoned as a combination of rangeland and farm use as farm land subject to the provisions of ORS 215.275

The failure to include all required land in the analysis results in a lack of compliance with the requirements of OAR 345-021-0010(l)(k) and OAR 345-022-0030. Due to this omission, the council cannot find the developer in compliance with ORS 469.504 or ORS 197.646 or OAR 345-022-0030.

The applicant states, "Several of the agricultural areas in the project area are zoned a combination of rangeland and farm use. Based on discussions with DLCD, IPC did not consider such hybrid zoned lands to be EFU lands for purposes of the ORS 215.278 analysis." This statement is not DOCUMENTATION as required for the application to be complete. There is no indication of who spoke with whom on what date, and nothing to document that the action actually occurred. Following is documentation taken directly from the LCDC rules that the combination zones are EFU and are required to be included in the ORS 215.278 analysis as well as the dictionary, IRS and FDA definitions of farm use which are consistent with the LCDC definition.

LCDC defines Exclusive Farm Use Zone in ORS 215.203(2)(a) as "farm use" means **the current employment of land for the primary purpose of obtaining a profit in money by raising, harvesting and selling crops or the feeding, breeding, management and sale of, or the produce of, livestock, poultry, fur-bearing animals or honeybees or for dairying and the sale of dairy products or any other agricultural or horticultural use or animal husbandry or any combination thereof.—"**

Oxford Dictionary defines "farming" as "The activity or business of growing crops and raising livestock"

The Internal Revenue Service defines "farm" as "includes stock, dairy, poultry, fruit, furbearing animal, and truck farms, plantations, ranches, nurseries, ranges, greenhouses or other similar structures used primarily for the raising of agricultural or horticultural commodities, and orchards and woodlands."

The FDA defines "farm" as "an establishment under one ownership in one general physical location devoted to the growing and harvesting of crops, the raising of animals (or seafood), or both"

A failure to include all farm land in completing the requirements of ORS 215.275 means the applicant is not in compliance with OAR 345-022-0030 which is required in order to issue a site certificate or determine whether or not the application meets the standards. This understatement of farm lands is especially problematic due to the decision *Friends of Parrett Mountain v. Northwest Natural Gas Co.*, 336. iOr. 93, 108 (2003) requiring the determination to be "reasonable" meaning fair proper, just, moderate or suitable under the circumstances". This transmission line is being sited on a far greater percentage of agricultural private land in counties where the public land includes a much greater percent of the total lands in the counties. The omission of most agricultural lands from the 215.275 analysis also means that the stated percentage of total farm lands being taken from the counties is significantly understated.

Sincerely,

Louise Squire

Louise Squire
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RECEIVED

AUG 22 2019

DEPARTMENT OF ENERGY

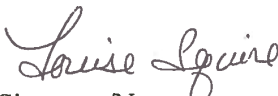
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B2H EFSC LACK OF DOCUMENTATION FOR GREAT GRAY OWL AND
FLAMMULATED OWL

The surveys provided for these two species are too old to be a reliable indicator of the presence or impacts to these bird species. They were done in 2011 and 2012, seven years ago. On Page P1-9, Table P1-1 the applicant proposes doing updated surveys only on areas not previously surveyed and submitting them to only ODOE. This type of secretive procedure where the public is completely removed from any opportunity to comment or review the decisions being made by ODOE is the basis for a great deal of public dissatisfaction with the process currently being supported by ODOE and EFSC.

There is no current information in the application to base any decision regarding what the impacts will be to these birds as a result of the Boardman to Hemingway Transmission Line. A site certificate cannot be issued determining compliance with OAR 345-022-0060 without knowing what the use of the area is by wildlife. In addition, since habitat category must include the use of the habitat by species, the habitat categories cannot be determined until the developer provides the necessary current information. Given that the area of the Ladd Marsh Wildlife area is not only protected, but also contains both federal and state mitigation areas, it is not possible to determine whether or not the development will have unacceptable impacts to these mitigation sites absent information regarding the use of the adjacent habitat by wildlife utilizing the mitigation sites and whether or not the habitat will be compromised making it unsuitable for use of the species due to impacts of the development. Considering the lack of information near Ladd Marsh Wildlife area, one must question why.

Ladd Marsh is an important Migratory Bird Flyway according to the Oregon Department of Fish and Wildlife (ODFW 2008.) The Audubon Society lists it as an Important Bird Area. The number of bird species using this area has expanded in the last several years, however, in 2008 over 230 species of birds had been recorded on LMWA and over 120 species nest in the area and yet the developer appears to be ignoring the importance of not only the wildlife area, but also the habitat surrounding the wildlife area which is critical to the survival of birds moving in and out of the mitigation sites.


Signature/Name

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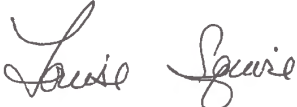
DEPARTMENT OF ENERGY

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FAILURE TO PROVIDE SITE CONDITIONS TO MINIMIZE THE RISK TO
GOLDEN EAGLES RESULTING FROM THE PROPOSED TRANSMISSION
LINE ROAD DEVELOPMENT

This project will go through the area surveyed for the Antelope Ridge Wind Development. Due to the lack of meaningful information being provided by IP in their application, it is necessary to go to the 2010 formal letter information summary regarding projected habitat impacts from that development in the area to be crossed by the B2H transmission line. ODFW comments regarding the surveys completed identified 4 active golden eagle nests and recommended no new roads be constructed within 1 mile (1/2 mile line of site) of the nests. Construction and maintenance activities should not occur within 1 mile line of sight (1/2 mile non line of site) of nest between January 1 and July 15.

In the event that ODFW no longer believes these recommended restrictions are valid, they need to explain how a reduced period and distance will continue to provide protection for golden eagles from roads being built at the site in order to comply with OAR 345-022-0060 and their rules.


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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.

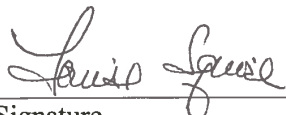
The Applicant identifies Category 1 Habitat for nest sites of golden eagle, Swainson's Hawk, goshawk, and burrowing owl. However, the applicant considers these point habitats with no associated range. While this approach is convenient, it is inconsistent with historical regulatory measures (e.g. forestry 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



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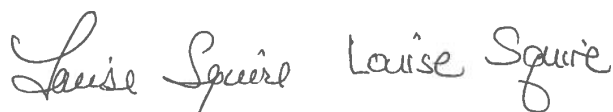
REMAINING THREE TOED WOODPECKER AND GOSHAWK SURVEYS NEEDED –
BOARDMAN TO HEMINGWAY TRANSMISSION PROJECT

The developer has failed to complete surveying the proposed site for the presence of American Three Toed Woodpecker, and they do not plan to complete the survey work which has started. See Exhibit P1, PAGE PI-9.

These surveys need to be included in the site certificate application.

Three toed woodpecker species are listed as at risk of becoming extinct. The developer has not surveyed the entire length of the proposed transmission line and they are proposing no further surveys. This means that the Oregon Department of Energy is unable to determine that the developer will be in compliance with the Threatened and Endangered Species rules contained in OAR 345-022-0070 or the Habitat Mitigation rules in OAR 345-022-0060. The entire siting corridor needs to be surveyed prior to the start of construction and all accessible areas should have been provided as a part of the application. There remain 287 calling stations which need to be surveyed prior to making a determination regarding the impacts to Northern Goshawk and American Three-toed Woodpeckers.

The only way that EFSC and ODOE can be deemed to be in compliance with the federal Threatened and Endangered Species act is through a valid and complete assessment and mitigation for habitat impacts to threatened and endangered species. The current application and failure to require the completion of surveys for all remaining areas will place the Oregon Department of Energy and Energy Facility Siting Council in the position of being liable for any damages sustained by these rare and endangered species.


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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 ACCESSIBLE 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.


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INTERFERENCE WITH RADIO SIGNALS

High voltage transmission lines interfere with radio and television signals. This can be not only an inconvenience, but a safety and health issue. Agricultural workers often work alone and in areas not observable by others. They rely upon cell phones and other devices to obtain help in the event of an accident. In addition, modern farm equipment is often radio controlled. A 500 kV transmission line will interfere with the functioning of radio controlled equipment. These impacts will severely impact farm production and the cost of production due to requiring additional employees to perform functions that occur automatically when the equipment is working.

The site certificate needs to clearly identify the developer as having responsibility to take necessary action to resolve any interference with radio signals which impact farming operations. Failure to require such action needs to result in the inclusion of the increased costs in the cumulative impacts that will show a significant increase in the costs of farming operations due to the transmission line.

Recommended Site Condition:

The developer will provide contact information for citizens to report suspected transmission line interference with radio, phone or equipment signals. Complaints will be followed up on within 30 days. The developer will take necessary action to remove the interference with radio signals relied upon by individuals engaged in farming operations.

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Louise Squire

July 27, 2019

Energy Facilities Sitting Council
c/o Kellen Tardaewether, Sitting Senior Analyst
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550 Capitol St. N.E.
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AUG 29 2019

DEPARTMENT OF ENERGY

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

I am an Eastern Oregonian and have traveled and recreated in the vicinity of Hilgard State Park for many years. I have concerns about the steep slopes, soils hazards, landslide risks, and erosion impacts that the construction of the Boardman to Hemingway Transmission line will pose in an already dangerous canyon.

Re: Soil Protection - **Drill site 95/3 and 95/4 on unstable and steep slopes**
345-022-0020

(c) ...*The applicant, through appropriate site-specific study, has adequately characterized the potential geological and soil hazards of the site and its vicinity that could, in the absence of a seismic event, adversely affect, or be aggravated by, the construction and operation of the proposed facility...*

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council;
effective date 10/18/2017; agency approved date 09/22/2017.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500 kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Drill sites 95/3 and 95/4 are shown on the following tables and maps and analysis by Shannon & Wilson, Inc.:

Soils; Map page 18 of 44:

Table B3: Soil Descriptions, described as:

5776CN; erosion hazard; severe, percent of slope Low; 30: High; 60. (sheet 3 of 4)

Table C1: Summary of Proposed Borings; Map Sheet 36

95/3 – Angle change along alignment; Slope stability/landslide; Geo-Seismic Hazard; Road and railroad crossing

95/4 - Angle change along alignment; Road and railroad crossing

Appendix E: Landslide Inventory, E.2.3; PLS-002 Sheet 5, 6

“PLS-002 is an approximately 460-acre potential landslide that was identified in available LiDAR data. PLS-002 has not been verified in the field and should not be considered a landslide based solely on interpretation of LiDAR data. The IPC Proposed Route passes above this potential landslide between towers 93/5 and 95/3, potentially affecting the stability of these proposed towers and associated work areas. A field reconnaissance along this portion of the alignment should be performed as part of the geotechnical exploration program.”

Idaho Power Corporation, in Exhibit H 2.2.4 states *“The soils (in Union County) vary from a few inches to a few feet thick over weathered bedrock, are generally well-drained, and are typically characterized as having a severe erosion hazard.”* Idaho Power Corporation admits in ASC page B-12 that *“The mountainous area such as the Blue Mountains present very challenging topography with many areas of steep slopes in excess of 35 percent and other areas of unstable slopes*

presenting design and construction challenges." IPCs stated original intention to the EFSC was the following: "Using topographic maps the corridors were adjusted to avoid or minimize distance across very steep slopes and other physical features less desirable for construction and operation of a transmission line.

Hazard Analysis Union County Emergency Operations Plan Updated 6/30/16 lists Winter weather as the highest weighted risk item before Seismic, Fire, Hazmat-Transportation, and Drought. Most of the area receives a large percentage of the annual moisture as snowfall and both the winter storms and the spring melt can be precipitous and unpredictable.

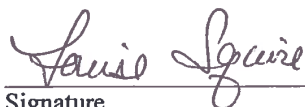
The area surrounding the drill site 95/3 and 95/4 is within a mile of the Hilgard Junction State Park and Recreation area and the heavily traveled I84 transportation/utility corridor.

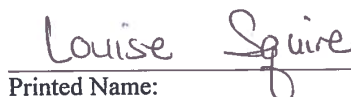
Conclusion and Requested Relief:

Drill site 95/3 and 95/4, and its vicinity, represent a significant risk of several possible adverse effects. This area encompassed by the lands shown in PLS-002 should be removed for consideration as a site for a transmission "facility." While Idaho Power Corporation attempts to mitigate problems of unstable soil with structure and footing modifications, this should not be considered an acceptable risk when the entire area is unstable.

I appreciate your consideration and your attention to this matter.

Sincerely,


Signature


Printed Name:

Mailing Address:

2105 Oak St. La Grande, Or 97850

References

Burns, W. J., Mickelson, K. A., Saint-Pierre, E. C., 2011 SLIDO-2, Statewide Landslide Information Database for Oregon, Release 2; Oregon Department of Geology and Mineral Industries.

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035.

Permanent Administrative Order EFSC 2-2017 Chapter 345 Department of Energy; Energy Facility Siting Council; effective date 10/18/2017; agency approved date 09/22/2017.

Oregon Department of Energy; Energy Facility Siting Council – Chapter 345, Division 22 General Standards for Siting Facilities; OAR Amend: 345-022-0022; Soil Protection

Idaho Power Corporation, 2017, *Exhibit H of the Application for the Boardman to Hemingway Transmission Line Project*: Report Prepared by Idaho Power Corporation, Boise, Idaho.

Geological Hazards and Soil Stability; Exhibit H. Attachment H-1, Engineering Geology and Seismic Hazards Supplement to Exhibit H Boardman to Hemingway 500kV Transmission Line Project Boardman, Oregon to Hemingway, Idaho January 25, 2018; Shannon & Wilson, Inc. 3990 Collins Way, Suite 100, Lake Oswego, Oregon. 97035, page 28 and elsewhere.

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

RECEIVED

AUG 23 2019

DEPARTMENT OF ENERGY

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

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.

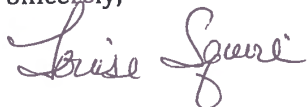
IDAHO POWER FAILED TO COMPLY WITH OAR 345-021-0010(1)(x) which states that Exhibit X must include information about noise generated by construction and operation of the Project within ½ mile of the site boundary. The site boundary means "the perimeter of the site of a proposed energy facility, it's related 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: Louise Squire

Mailing Address: 2105 Oak St
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August 5, 2019

Energy Facilities Siting Council
c/o Kellen Tardaewether, Senior Siting Analyst
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AUG 23 2019

DEPARTMENT OF ENERGY

Via EMAIL: B2H.DPOComments@Oregon.gov

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

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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.

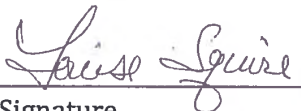
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1. The applicant lists the areas which are included in the site boundary in Exhibit F, Page F-2, however, they failed to include noise modeling or include all the receptors within the ½ mile area beyond the entire site perimeter.
2. The applicant failed 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

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AUG 23 2019

DEPARTMENT OF ENERGY

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 Louise Squire
Address 2105 Oak St
La Grande, Or
97850

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AUG 22 2019

DEPARTMENT OF ENERGY

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

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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

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DEPARTMENT OF ENERGY

EFSC B2H FAILURE TO INCLUDE IMPACTS OF MODIFICATION OF EXISTING ROADS WITH 0-20% IMPROVEMENT.”

Comment Regarding the Following:

When Modifications are made to existing roads, these roads must be included in the site boundary and be controlled by the conditions of the site certificate, or, if not included in the site boundary, must go through the local County or City Land Use Process including public hearings and any other requirements.

Definitions contained in the Oregon Statutes and EFSC Rules clearly define the area which is controlled by the site certificate.

1. The “site” is defined in ORS 469.300 as “any proposed location of an energy facility and related or supporting facilities.”
2. ORS 469.300 also defines “Related or supporting facilities” as “means any structure, proposed by the applicant, to be constructed or substantially modified in connection with the construction of an energy facility, including associated transmission lines, reservoirs, storage facilities, intake structures, road and rail access.-----”

The court case listed on Page K-12 footnote which is cited to support the determination that there is “no substantial modification” by looking at the percentage of modification along an entire road segment does not speak to this issue. There is no definition of what constitutes an “entire road segment”, and substantial modification may occur, and will occur at different locations along the roads when widening or resurfacing is required in order to accommodate equipment and supplies being transported onto or off the transmission line construction area. The appeals court decision is attached to document the failure of this document to provide the definition that the application appears to credit to it.

3. A site certificate by definition contained in ORS 469.300(26) means “the binding agreement between the State of Oregon and the applicant, authorizing the applicant to construct and operate a facility on an approved site, incorporating all conditions imposed by the council on the applicant.”

The issue of control of modifications to existing roads outside the site boundary are also defined in the following definitions contained in OAR 345-001-0010 including:

4. (54) ““Site” as defined in ORS 469.300. “Energy facility site” means all land upon which an energy facility is located or proposed to be located. “Related or supporting

facilities site” means all land upon which related or supporting facilities for an energy facility are located or proposed to be located.

5. (55) “”Site boundary” means the perimeter of the site of a proposed energy facility, its related or supporting facilities, all temporary laydown and staging areas and all corridors and micrositing corridors proposed by the applicant.”

6. (56) “”Site certificate” as defined in ORS 469.300.”

The above definitions, particularly the definition of “site certificate” in the statute clearly limit the extent of the Oregon Department of Energy and Energy Facility Siting Council evaluation and control to activities occurring on the “site” as defined in the above rules and statute. Any modifications to road segments which are not included in the site boundary are outside the jurisdiction of the Energy Facility Siting Council. Modifications to these road segments must go through the Planning Department Processes utilized in each county including the zoning, public hearing and any other local land use requirements specific to each county, or be included in the site boundary and be required to “incorporate all conditions imposed by the council on the applicant.”

Louise Squire
Louise Squire
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August 2, 2019

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DEPARTMENT OF ENERGY

THE APPLICANT SIGNIFICANTLY UNDERSTATES THE IMPACTS TO EMPLOYMENT AND FOREST LANDS AS A RESULT OF THE PROPOSED B2H TRANSMISSION LINE

Exhibit K, Attachment K-2, Pages 19 and 20, Section 7.0

The applicant claims that removal of forestland by clearing of trees for a period of over 50 years will have little economic impact to forest sector jobs in Umatilla and Union County. They value the loss of 245.6 acres of forestland in Umatilla County at \$488.60 per acre. However, they value the removal of 530.1 acres lost to the transmission line in Union County at \$182.98 per acre. The applicant provides no justification or documentation to support the difference in value per acre between Umatilla and Union Counties.

Some forest facts related to this section:

According to US Forest Service Tech. Rept. PNW-GTR-578 Rev. 2004 entitled "Forests of Eastern Oregon: an Overview", Eastern Oregon Forests produce an average of 20 cubic feet per acre of timber each year. That would mean that an acre of land would produce approximately 240 board feet of lumber per year per acre during the life of the transmission line. According to Scott Hartell, Planning Director, Union County, forest land in Union County is classified as either 20 cubic feet per acre per year, or 50 cubic feet per acre per year, so the value amounts could be significantly higher. The "Forest Facts Oregon's Forests: Some Facts and Figures" published in 2009 by the Oregon Department of Forestry states that economists estimate that for every billion board feet that is harvested in Oregon 11 forest sector jobs are created or retained.

Idaho Power's stated timber values are unrealistically low according to individuals owning forest land in both counties. No one would be using land for trees which precludes other uses if the economic benefits were as the developer is stating.

The applicant's identification of the acres of forest land impacted is incorrect due not only to the failure to use soil types to identify forest lands, but also, the fact that they are requesting a 300 foot right of way and they need to include the value of any additional trees they will be removing in the 100 foot area on each side of the right of way.

The applicant claims that the value of the land in the right of way will not be significantly reduced due to the owner's opportunity to use the land for agricultural or range land after the transmission line is constructed. This is completely unfounded. The lineal nature of a transmission line precludes any productive use of land taken for the transmission line. The right of way is too narrow to make it available for production of crops, and the costs associated with purchasing equipment for agricultural operations would be prohibitive.

It would be unusual for a forest operator to already own equipment for a crop operation. In order to use the right of way as grazing land, it would have to be fenced. According to "Estimated Livestock Fencing Costs for the Small-Farm Owner" by Derek L. Barber, the average cost of materials for ¼ mile (1,320 ft.)

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.

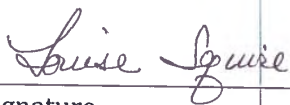
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming 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:

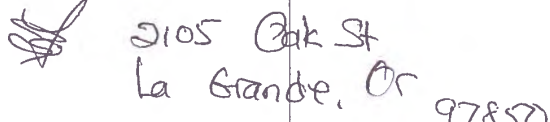
The applicant has failed to document that they will comply with Land Use Goal 4 OAR 660-006-000 through OAR 660-006-0010; There is no documentation provided that would indicate they are in compliance with OAR 345-022-0030 and they have not documented, nor are they able to meet the requirement contained in OAR 345-022-0030(4) to allow an exception.

Therefore, the Council should DENY the application for site certificate.


Signature

Louise Squire
Printed Name

Mailing Address:


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AUG 22 2013

DEPARTMENT OF ENERGY

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Regarding: THERE WILL BE AN INCREASED RISK OF WILD FIRES AND THERE IS A LACK OF LOCAL RESOURCES TO RESPOND IN A TIMELY AND EFFECTIVE MANNER.

The Boardman to Hemingway transmission line will increase the potential and severity of wildfires due to opening up additional access for people, lightning strikes, remoteness of much of the line, the fact that high voltage transmission lines increase the height and heat of fires along the transmission lines, and limitations on local human and equipment resources to fight wildfires in remote locations.

Both Union County and Baker County have submitted comments regarding the fact that they do not have the manpower or specialized equipment necessary to fight fires in the new remote areas which will have an increased risk of catastrophic fires. Part of the area which will be crossed by the transmission line has no designated fire protection other than the Oregon Forest service. Areas where the Rural Fire Protection District is the designated fire department, there is no protection for wildfires. Because the RFPD's are only trained to fight structural fires..'

Given the timeframes for contacting and assembling volunteers, and the long travel times to respond to multiple areas along the transmission line, fires will have an opportunity to grow significantly prior to any fire response being able to access the area. Reports from volunteers called on to fight a fire which occurred during the construction of the Elkhorn Wind development stated they had difficulty accessing the area, the terrain was steep, and there were multiple rattlesnakes in the area which made the job of fighting the fire very difficult..

Both Union and Baker Counties have submitted written comments to the Oregon Department of Energy stating they would need additional manpower and equipment if they are to be in a position of being able to effectively protect the citizens and resources from potential wildfires resulting from the development of the transmission line.

This is a serious issue due to the fact that the developer has indicated their intent to rely upon local resources in the event a fire occurs along the transmission line.

Following is the risk assessment for Oregon cities of high risk for wildfires.

**Condensed Version of
Oregon's 2006 *Communities At Risk* Assessment
Identification of High Risk CARs Only**

Background

Oregon natural resource agencies, fire service professionals, and communities facing the threat of wildfires recognize the need for risk assessment. Many local communities and counties throughout Oregon have developed local risk assessments using a variety of methods. A statewide task force was formed in February 2004 as part of the Oregon Department of Forestry's Fire Program Review to

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develop a statewide assessment of *Communities At Risk*. This supports fulfillment of the Memorandum of Understanding (MOU) between the National Association of State Foresters (NASF) and federal agencies as well as Task E in Goal 4 of the *Implementation Plan for the 10-Year Comprehensive Strategy*. The task force brought together a number of stakeholder organizations outside of those involved in the MOU. The statewide *Communities At Risk* assessment also provides guidance for communities in the process of developing or updating local risk assessments to align with the state methodology.

Results

Five hundred sixty-four (564) *Communities At Risk* in Oregon were identified and assessed for their relative risk to wildfire. *Community At Risk* is a “geographic area within and surrounding permanent dwellings with basic infrastructure and services, under a common fire protection jurisdiction, government, or tribal trust or allotment, for which there is a significant threat due to wildfire.” They were identified by determining where permanent dwellings with basic infrastructure and services exist at the density required by federal legislation; a community name was assigned to these populated areas based upon a common fire protection jurisdiction, government, or tribal trust or allotment; then a geographic area surrounding these populated jurisdictions was identified is to be considered part of the community based upon a fire shed concept.

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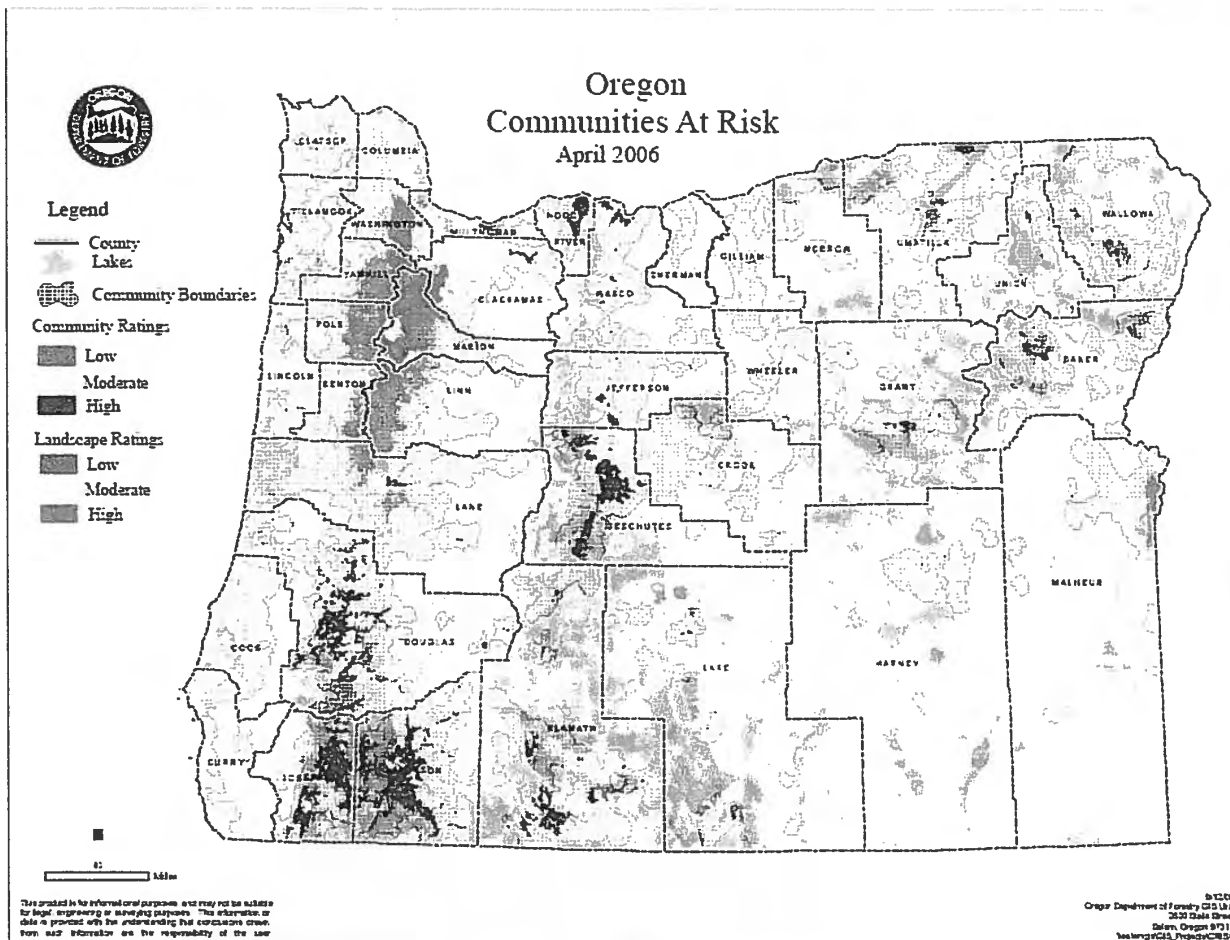


Figure 1. Community At Risk overall assessment

Listing of Communities At Risk and Rating

BAKER	BAKER (County)	H
	Baker City (City)	H
	BAKER RFPD (RFPD)	H
	HAINES FIRE PROTECTION DIST. (RFPD)	H
	Halfway (City)	H
	PINE VALLEY RFPD (RFPD)	H
	Sumpter (City)	H
CROOK	CROOK (County)	H
DESCHUTES	Bend (City)	H

	BEND FD (RFPD)	H
	BLACK BUTTE RANCH RFPD (RFPD)	H
	CLOVERDALE RFPD (RFPD)	H
	CROOKED RIVER RANCH RFPD (RFPD)	H
	DESCHUTES (County)	H
	LAPINE RFPD (RFPD)	H
	Sisters (City)	H
	SISTERS-CAMP SHERMAN RFPD (RFPD)	H
	Sunriver (RFPD)	H
DOUGLAS	AZALEA VOLS (RFPD)	H
	Calapooya (RFPD)	H
	CAMAS VALLEY VOL RFD (RFPD)	H
	Canyonville (City)	H
	CANYONVILLE SOUTH UMPQUA FD (RFPD)	H
	Cow Creek (Reservation)	H
	DAYS CREEK RFD (RFPD)	H
	DOUGLAS (County)	H
	DOUGLAS CO FIRE DIST #2 (RFPD)	H
	Douglas CO Fire District #5 (RFPD)	H
	Drain (City)	H
	DRAIN RFPD (RFPD)	H
	FAIR OAKS RFPD (RFPD)	H
	Glendale (City)	H
	GLENDALE RFPD (RFPD)	H
	GLIDE RFPD (RFPD)	H
	LOOKINGGLASS RFD (RFPD)	H
	MILO RFPD (RFPD)	H
	Myrtle Creek (City)	H
	MYRTLE CREEK FD (RFPD)	H
	Oakland (City)	H
	OAKLAND RFPD (RFPD)	H
	RICE HILL RFD (RFPD)	H

	Riddle (City)	H
	Riddle RFPD (RFPD)	H
	Roseburg (City)	H
	Sutherlin (City)	H
	TENMILE RFPD (RFPD)	H
	TILLER RFPD (RFPD)	H
	TRI CITY FIRE DIST #4 (DOUG) (RFPD)	H
	Winston (City)	H
	Yoncalla (City)	H
	YONCALLA RFPD (RFPD)	H
GRANT	Canyon City (City)	H
	Granite (City)	H
	GRANT (County)	H
	John Day (City)	H
	JOHN DAY FIRE DEPT (RFPD)	H
	Long Creek (City)	H
	MT VERNON FD (RFPD)	H
	Mt. Vernon (City)	H
	Prairie City (City)	H
	PRAIRIE CITY FIRE DEPT (RFPD)	H
	Seneca (City)	H
HOOD RIVER	Cascade Locks (City)	H
	DEE RFPD (RFPD)	H
	Hood River (City)	H
	HOOD RIVER (County)	H
	ODELL RFPD (RFPD)	H
	PARKDALE RFPD (RFPD)	H
	PINE GROVE RFPD (RFPD)	H
	WEST SIDE RFPD (RFPD)	H
JACKSON	APPLEGATE RFPD #9 (RFPD)	H
	Ashland (City)	H
	Butte Falls (City)	H
	Central Point (City)	H

	COLESTIN RFPD (RFPD)	H
	Eagle Point (City)	H
	EVANS VALLEY FIRE DIST #6 (RFPD)	H
	Gold Hill (City)	H
	JACKSON (County)	H
	JACKSON CO FD #3 (RFPD)	H
	JACKSON CO RFPD #4 (RFPD)	H
	JACKSON CO RFPD #5 (RFPD)	H
	Jacksonville (City)	H
	LAKE CREEK RFPD #8 (RFPD)	H
	Medford (City)	H
	MEDFORD F&R (RFPD)	H
	Phoenix (City)	H
	PROSPECT RFPD (RFPD)	H
	Rogue River (City)	H
	ROGUE RIVER RFPD (RFPD)	H
	Shady Cove (City)	H
	Talent (City)	H
JEFFERSON	Camp Sherman (RFPD)	H
	JEFFERSON (County)	H
	Warm Springs (Reservation)	H
	WARM SPRINGS FIRE SFTY (RFPD)	H
JOSEPHINE	APPLEGATE RFPD #9 (RFPD)	H
	Cave Junction (City)	H
	Grants Pass (City)	H
	ILLINOIS VALLEY RFPD (RFPD)	H
	JOSEPHINE (County)	H
	Oregon Caves NM (NPS)	H
	RURAL METRO FIRE DEPT (RFPD)	H
	WILLIAMS RFPD (RFPD)	H
	WOLF CREEK RFPD (RFPD)	H
KLAMATH	BLY RFPD (RFPD)	H
	CHEMULT RFPD (RFPD)	H

	Chiloquin (City)	H
	CHILOQUIN-AGENCY LK RFPD (RFPD)	H
	CRESCENT RFPD (RFPD)	H
	HARRIMAN RFPD (RFPD)	H
	KENO RFPD (RFPD)	H
	KLAMATH (County)	H
	Klamath (Reservation)	H
	KLAMATH CO FD #3 (RFPD)	H
	KLAMATH CO FD #5 (RFPD)	H
	KLAMATH CO FIRE DIST #1 (RFPD)	H
	Klamath Falls (City)	H
LAKE	LAKE (County)	H
	Lakeview (City)	H
	LAKEVIEW FIRE DEPT (RFPD)	H
	NEW PINE CREEK RFPD (RFPD)	H
	Paisley (City)	H
	THOMAS CREEK/WESTSIDE RFPD (RFPD)	H
LANE	Blue River WD (RFPD)	H
	Hazeldell Rural Fire District (RFPD)	H
	Oakridge (City)	H
	Upper McKenzie RFPD (RFPD)	H
MALHEUR	Vale (City)	H
MARION	Detroit (City)	H
UMATILLA	EAST UMATILLA CO RFPD (RFPD)	H
	Ukiah (City)	H
	UMATILLA (County)	H
	Umatilla (Reservation)	H
UNION	Cove (City)	H
	COVE RFPD (RFPD)	H
	Elgin (City)	H
	ELGIN VOL FIRE DEPT (RFPD)	H
	HAINES FIRE PROTECTION DIST. (RFPD)	H
	IMBLER RFPD (RFPD)	H

	La Grande (City)	H
	UNION (County)	H
WALLOWA	Enterprise (City)	H
	Lostine (City)	H
	Wallowa (City)	H
	WALLOWA (County)	H
	WALLOWA FD (RFPD)	H
WASCO	JUNIPER FLATS RFPD (RFPD)	H
	MID-COLUMBIA F&R (RFPD)	H
	Mosier (City)	H
	MOSIER FD (RFPD)	H
	PINE GROVE RFPD (RFPD)	H
	PINE HOLLOW VOL (RFPD)	H
	Wamic (RFPD)	H
	Warm Springs (Reservation)	H
	WASCO (County)	H
WHEELER	FOSSIL VOL FD (RFPD)	H
	Mitchell (City)	H
	WHEELER POINT VOL FIRE ASSOC (RFPD)	H

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AUG 22 2019

DEPARTMENT OF ENERGY

Kellen Tardaewether
Senior Siting Analyst
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Oregon Department of Energy
550 Capitol St. NE 1st Floor
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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, gazing, 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 predesignated 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 its 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,

Louise Squire
Louise Squire
2105 Oak St
La Grande, OR
97850

August 2, 2019

Kellen Tardaewether, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St. NE
Salem, Oregon 97301
email: B2H.DPOComments@Oregon.gov

RECEIVED

AUG 22 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.

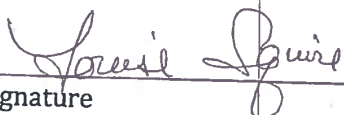
Removing forested land along the transmission line will result in nearly a total loss of the economic value of the land removed from production of trees, and will impact the landowners and county economy not only by the loss of the production of trees and taxes, fees, employment and other benefits coming 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

Louise Squire
Printed Name

Mailing Address:

2105 Oak St
La Grande, Or
97850

RECEIVED

AUG 22 2019

Department of Energy

Dragon Energy Facility Siting Council
c/o K. Tardae wecker, Analyst
Dragon Dept. of Energy
558 Capitol St. NE
Salem, OR 97301

PORTLAND, OR 972
17 AUG 2019 PM 4 L



ESTERSON Sarah * ODOE

From: Louise Squire <squirel@eoni.com>
Sent: Thursday, August 22, 2019 2:22 PM
To: B2H DPOComments * ODOE
Subject: B2H DPO comment, Sage-grouse
Attachments: Sage grouse letter (Recovered).docx

Date: 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

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway Transmission Project 9/28/2018;
Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Topic of my comment: Greater Sage-grouse

The future of Greater Sage-Grouse survival is unknown at this time for a number of reasons. Clearly things have changed since the filing of the application which already makes the biological surveys conducted and the mitigation plans outdated. Also it is likely that the Greater Sage-Grouse Comprehensive Conservation Strategy, 2006, ODFW's OAR 635-415-0025(7) and OAR 635-140-0000 to 0025, will be revised.

Climate change and planetary warming are driving rapid environmental change and destabilizing eco-systems creating additional enormous strains and stressors on the habitat of the greater sage-grouse. (Haak, conservation-portfolio-04172019.pdf) IPC's B2H transmission line construction and maintenance, with its 250' wide clear cut of sage brush under the line, will add additional threats to their survival. As noted in the DPO, page 314, lines 4-9: The proposed facility would include the following facility components within sage-grouse core area habitat: 20.77-line miles of transmission line; 12.85 miles of new access roads; and 12.34 miles of substantially modified existing roads. Habitat fragmentation and loss is a big concern for the overall survival of the species (Haak, conservation-portfolio-04172019.pdf). The Baker and Cow Creek PACs (Priority Areas of Concern), in particular, face extirpation (extinction) as this project creates another nail in their coffin.

There are additional threats to sage-grouse, a threatened species, from the B2H project.

1. Transmission lines and transmission towers cause sage-grouse mortality via bird collisions with the lines and facilitate raptor predation of sage-grouse (Wisdom et al. Sage-Grouse SAB Monograph 18.pdf Page 17).

2.The 250' clearance of vegetation under the transmission lines will create loss of habitat and the introduction of invasive weeds. Building new roads and substantially modifying existing roads exacerbates the spread of cheat grass. Cheat grass is taking over sage brush habitat which in turns threatens the sage-grouse because the sage-grouse needs large healthy expanses of sage brush to survive. Cheat grass also dries out early in the season and is thus more fire prone, also endangering the sage-grouse. (Haak, conservation-portfolio-04172019.pdf page 7)

3. The main direct threat to sage-grouse from transmission lines is the tendency of sage-grouse to avoid tall, and especially tall linear, structures -- they recognize these are potential locations of predators. (<https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf>, pg 8-9) The application, and the DPO, do not adequately account for the likely avoidance effects.

4. In its annual monitoring report in 2018, the ODFW concluded that sage-grouse populations throughout Oregon continue to decline (https://www.dfw.state.or.us/wildlife/sagegrouse/docs/ODFW_2018_Sage-Grouse_Population_Report.pdf at p. 1, hereinafter "ODFW 2018"). The state agency estimated that the 2018 spring population in Oregon was 18,421 individuals. This was a 10% decline from 2017 (population estimated at 20,510 birds), following a 7.7% decline from 2016. The 2018 population had now dropped to 37% below the 2003 baseline population estimate of 29,237 individuals (ODFW 2018). We expect ODFW to announce ever more severe declines in its 2019 report later this year. Other states have reported similar declines.[1] The Baker PAC, which will be affected by the B2H transmission line, has seen its population drop by 75.4% between 2003 and 2018, with a 10.9% decline from 2017 to 2018 alone. (ODFW 2018 at 32, 5).

The Draft Proposed Order and the application do not adequately address the enhanced danger that the B2H transmission line poses in light of the rapidly-decreasing populations. Neither the application nor the DPO actually cite the number of birds that will be affected, nor do they indicate that the sage-grouse populations in Oregon generally, and the Baker and Cow Valley PACs that will be affected by the B2H transmission line, are in serious and significant decline -- and that the addition of a significant habitat disruptor such as a linear transmission line could mark the death knell for these populations. Approval of a site certificate without considering the actual numbers of birds affected and the plummeting populations would be unlawful.

Sincerely,

Louise Squire

2105 Oak St
La Grande, Oregon
97850

squirel@eoni.com

[1] See, e.g., IdahoNews, Idaho male sage-grouse counts decline 25% in one year, available at <https://idahonews.com/news/local/idaho-male-sage-grouse-counts-decline-25-in-one-year> (last visited Aug. 1, 2019) (Idaho Fish & Game reporting 25% decline in male sage-grouse since 2018); Angus M. Thuermer Jr., WyoFile, Greater sage grouse counts show 3-year downward trend, available at <https://www.wyofile.com/greater-sage-grouse-counts-show-3-year-downward-trend/> (last visited Aug. 6, 2019); Wyo. Game & Fish Dep't, Sage grouse counts likely to decline in coming year, available at <https://wgfd.wyo.gov/News/Sage-grouse-chick-production-likely-to-decline-in> (last visited Aug. 6, 2019) (Wyoming Game & Fish Department expected decline in 2018 based on an analysis of sage grouse wings provided by hunters); Nevada Department of Wildlife, Nevada Sage-grouse Lek Counts: Effort and Trends (2017), available at http://sagebrushhco.nv.gov/uploadedFiles/sagebrushhconvgov/content/Meetings/2017/2017_GSG_Lek_Counts.pdf (last visited Aug. 6, 2019) (reporting 10% decline in male lek attendance between 2016 and 2017).

--

"Going completely vegetarian one day a week for a year is equivalent to not driving 1,160 miles."

Date: 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

Subject: Idaho Power Application for a Site Certificate for the Boardman to Hemingway
Transmission Project 9/28/2018; Draft Proposed Order.

Dear Chair Beyeler and Members of the Council:

Topic of my comment: Greater Sage-grouse

The future of Greater Sage-Grouse survival is unknown at this time for a number of reasons. Clearly things have changed since the filing of the application which already makes the biological surveys conducted and the mitigation plans outdated. Also it is likely that the Greater Sage-Grouse Comprehensive Conservation Strategy, 2006, ODFW's OAR 635-415-0025(7) and OAR 635-140-0000 to 0025, will be revised.

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Sincerely,

Louise Squire

2105 Oak St
La Grande, Oregon
97850

squirrel@eoni.com

[1] See, e.g., IdahoNews, Idaho male sage-grouse counts decline 25% in one year, *available at* <https://idahonews.com/news/local/idaho-male-sage-grouse-counts-decline-25-in-one-year> (last visited Aug. 1, 2019) (Idaho Fish & Game reporting 25% decline in male sage-grouse since 2018); Angus M. Thuermer Jr., WyoFile, Greater sage grouse counts show 3-year downward trend, *available at* <https://www.wyofile.com/greater-sage-grouse-counts-show-3-year-downward-trend/> (last visited Aug. 6, 2019); Wyo. Game & Fish Dep't, Sage grouse counts likely to decline in coming year, *available at* <https://wgfd.wyo.gov/News/Sage-grouse-chick-production-likely-to-decline-in> (last visited Aug. 6, 2019) (Wyoming Game & Fish Department expected decline in 2018 based on an analysis of sage grouse wings provided by hunters); Nevada Department of Wildlife, Nevada Sage-grouse Lek Counts: Effort and Trends (2017), *available at* http://sagebrushhoco.nv.gov/uploadedFiles/sagebrushhococontent/Meetings/2017/2017_GSG_Lek_Counts.pdf (last visited Aug. 6, 2019) (reporting 10% decline in male lek attendance between 2016 and 2017).

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

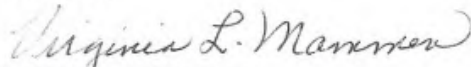
When considering only the traffic and safety issues listed above, the use of the "loop" as a part of the route for Idaho Power seems to be not only dangerous for the residents but unconscionable and irresponsible for Idaho Power to use such streets that are currently primarily for the neighborhood for 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

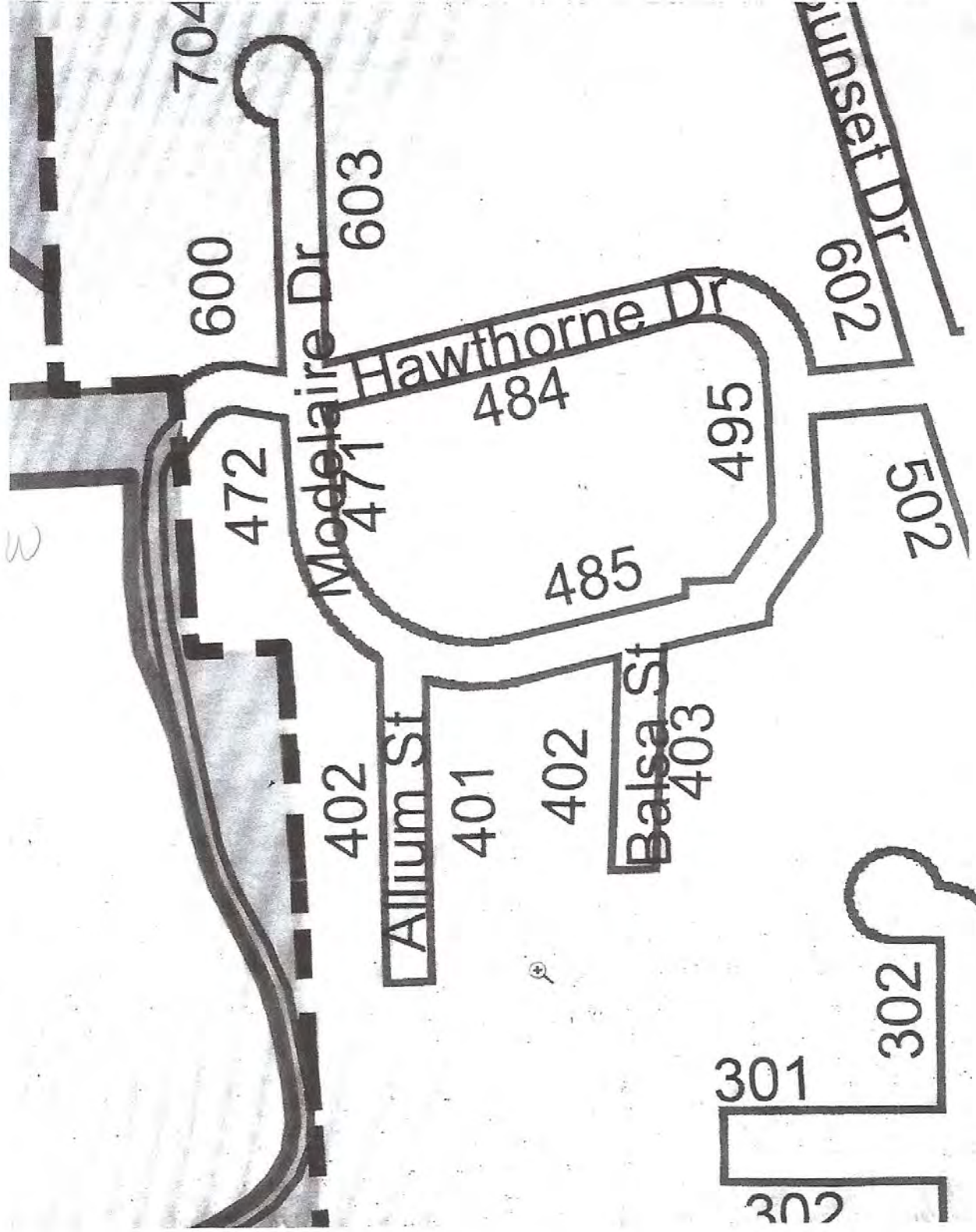


Exhibit 3

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



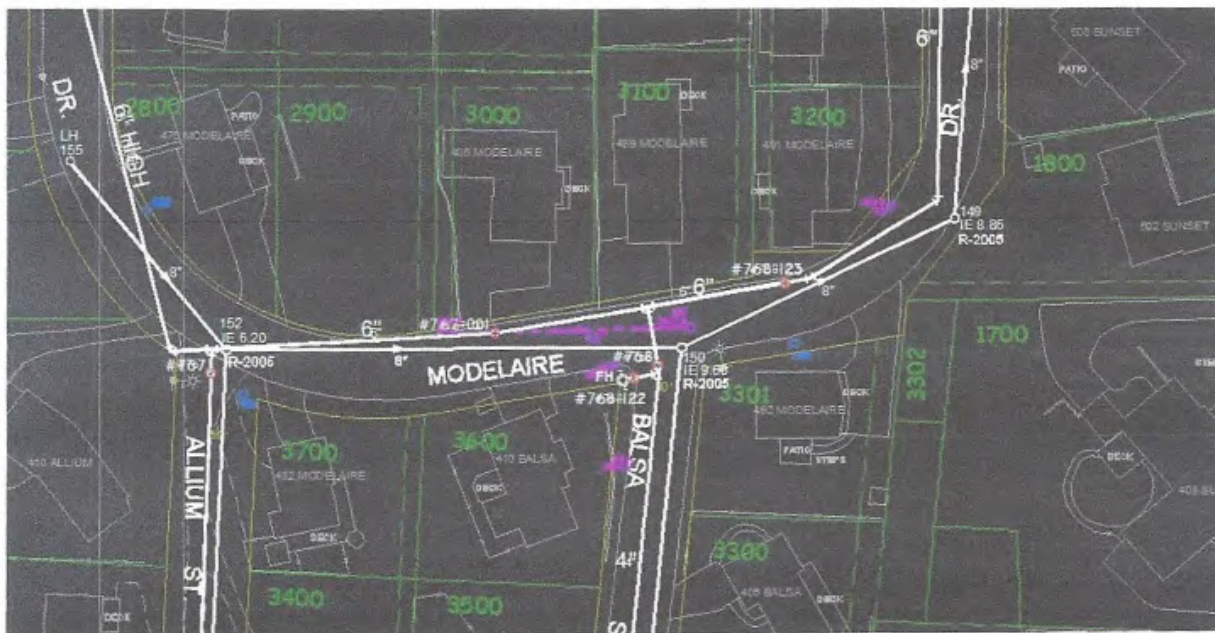
Hawthorne.jpg
150K

Modelaire.jpg
120K

7/25/2019

0 (1067x555)

Exhibit 7



7/25/2019

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Exhibit 8



Exhibit 9

attachment U2

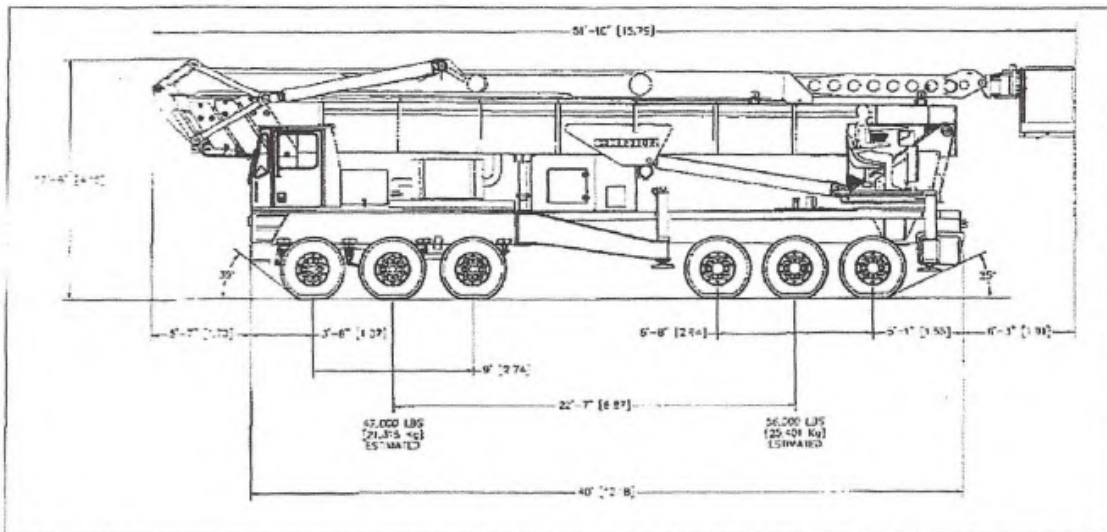


Figure 2. Example Aerial Lift Crane to be Used During Construction (Roadable Length 52 Feet; Width 8 Feet 6 Inches)

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

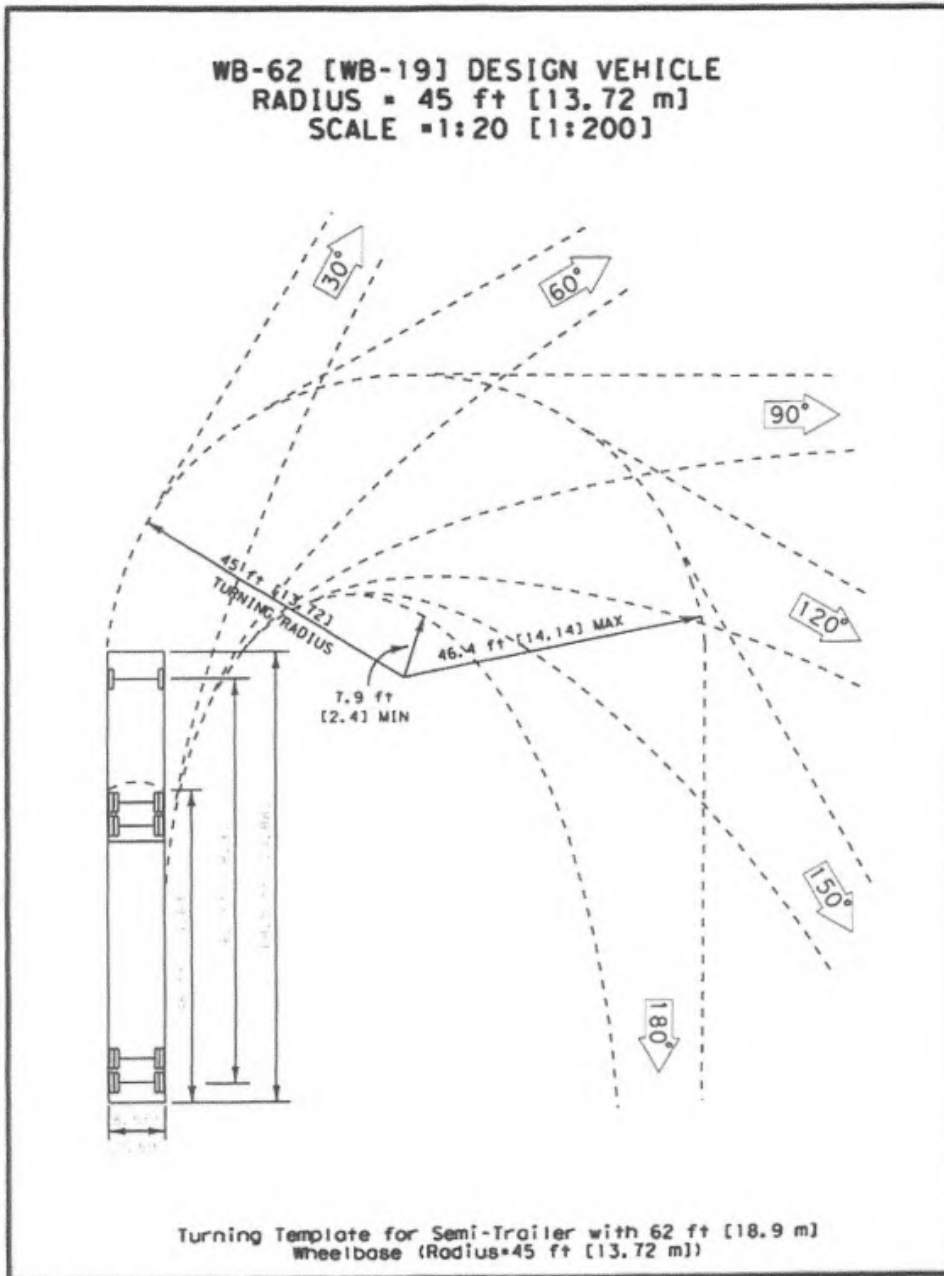


Figure 7-4. Turning Template for Semi-Trailer with 62 ft [18.9 m] Wheelbase, (not to scale). Click [here](#) to see a PDF of the image.

7/24/2019

7-1.png (596x805)

Exhibit 14

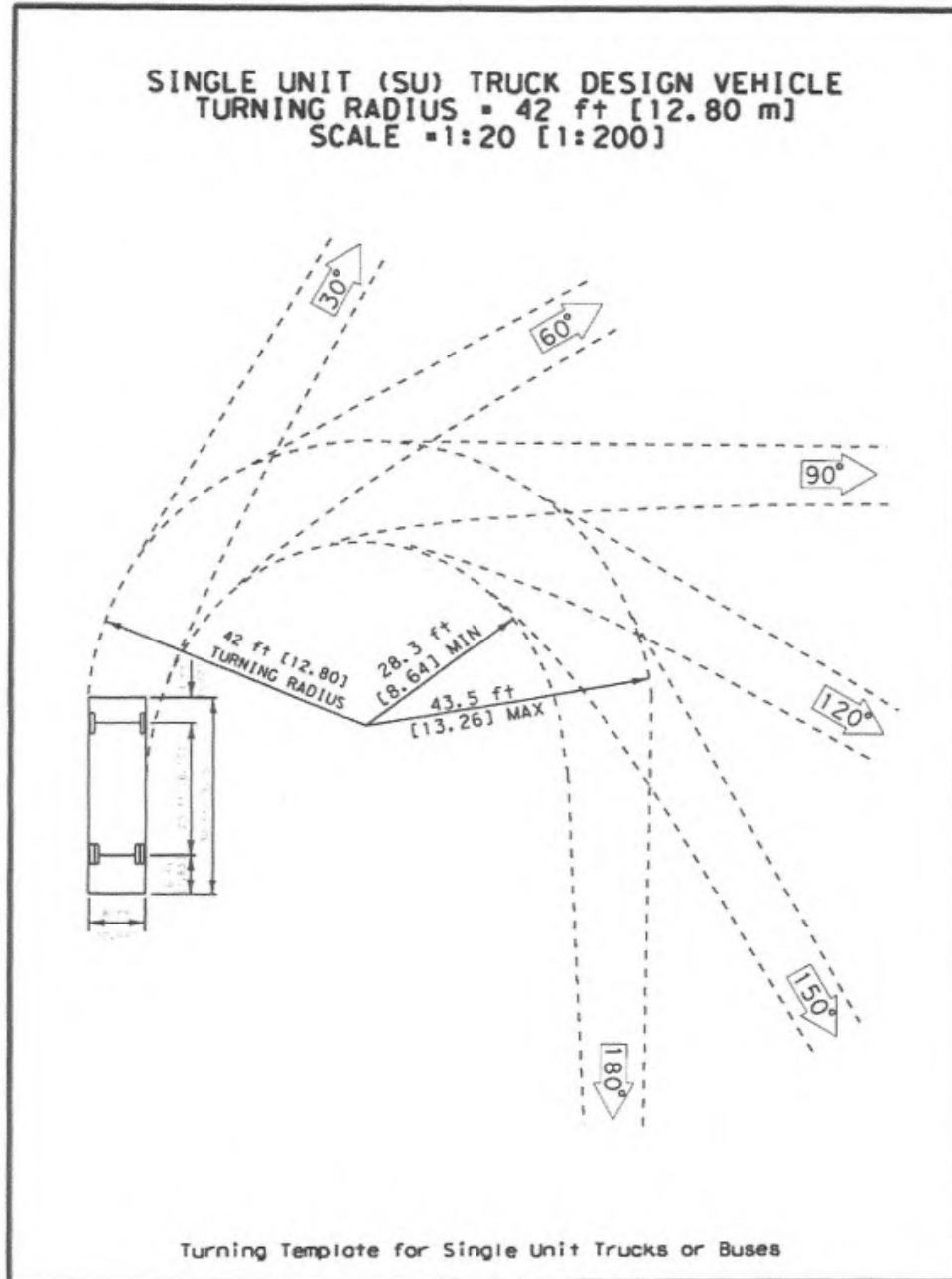


Exhibit 15

**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.

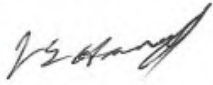
Section 17. TRUCK ROUTES

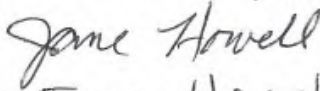
- a. It shall be unlawful for any person, firm, or corporation to use, drive or operate any vehicle or combination of vehicles with a gross weight of 26,000, pounds or more upon any street of the City of La Grande, Oregon, except upon posted truck routes.
- b. Any vehicle with a gross weight over 26,000, 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.

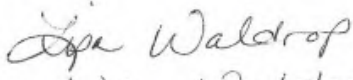
Section 18. IMPOUNDMENT AND DETENTION OF VEHICLES

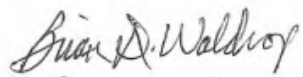
- a. Whenever a vehicle is placed in a manner or location that constitutes an obstruction to traffic or a hazard to public safety, a police officer or enforcement officer shall order the owner or operator of the vehicle to remove said vehicle. If the vehicle is unattended, the officer or enforcement 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.

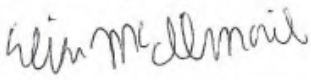
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this 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 mcilmail151@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

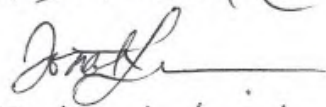

C. Huxell
472 Modelaire Dr. LG, OR 97850
CHRIS Huxell @ EMAIL.COM

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

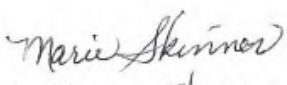

Jonah Lindeman
702 Modelaire LaGrande
jlindeman@rpi.ag

SIGNATURE

PRINTED NAME

ADDRESS

EMAIL

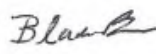

Marie Skinner
208 3rd LaGrande
marieskinner@hotmail.com

SIGNATURE

PRINTED NAME

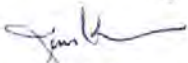
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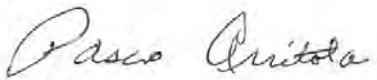

Blake Bars
1101 G Ave La Grande
blakebars@gmail.com

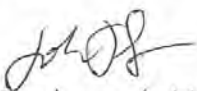
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SIGNATURE 
PRINTED NAME D. Dale Mammen
ADDRESS 405 Balsa, La Grande, Or
EMAIL d mammen @ coni. com


SIGNATURE 
PRINTED NAME Jim Kreider
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EMAIL jkreider@campblackdog.org

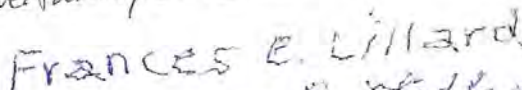
SIGNATURE 
PRINTED NAME Judie Arritola
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EMAIL jtol@charter.net


SIGNATURE 
PRINTED NAME Pasco Arritola
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SIGNATURE 
PRINTED NAME John Bazuta
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EMAIL

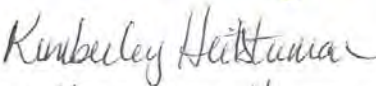
I have read the attached letter regarding the use of the Modelaire/Hawthorne Loop and it expresses my concerns and my request to abandon the plan to use this residential loop for the project. As one of the undersigned I strongly oppose our community being used as a primary access point to build this transmission line. Furthermore, I oppose the current proposed preferred route close to the city limits of La Grande because it impacts in various other ways the daily lives of many residents of our community.

SIGNATURE 
PRINTED NAME Andrea Galzow
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SIGNATURE 
PRINTED NAME Frances E. Lillard
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EMAIL

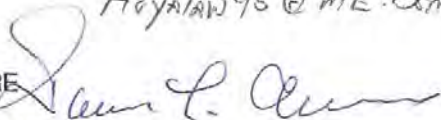
SIGNATURE 
PRINTED NAME Brent H. Smith
ADDRESS 410 Allium St
EMAIL smithbrent@gmail.com

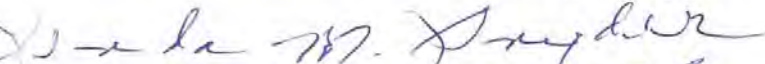
SIGNATURE 
PRINTED NAME M. Jeannette Smith
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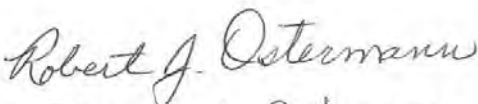
SIGNATURE 
PRINTED NAME KIMBERLEY HEITSTUMAN
ADDRESS 2409 CENTURY LP, LA GRANDE, OR 97850
EMAIL kimheitstuman@hotmail.com


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SIGNATURE: 
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