

Rec: 08/06/07
CWI-004

From: Gary and Linda Casady
Sent: Monday, August 06, 2007 1:17 PM
To: BPA Public Involvement
Subject: Cascade Wind Interconnection Project General Interconnection Request #G116

Dear Mr. Keller:

Thank you very much for the opportunity to comment on UPC Wind Management ' s request to connect to the BPA 115kv The Dalles - Hood River transmission line as per NEPA requirements for an environmental analysis.

I am opposed to this connection simply because I firmly believe that siting the Cascade Wind Project in the location proposed on Seven Mile Hill is too great a cost on the environment for the gains realized in renewable energy generated.

Perhaps the dominant factor to consider regarding the environment is the habitat type within and surrounding the proposed Cascade Wind Project. (The site map submitted with the UPC application for Site certification shows that the substation, interconnection facility and O & M building are in the midst of forested area, even though this is, I think, land owned by GE.) The habitat is primarily a significant part of what both the ODFW Conservation Strategy of January 2006 and the Oregon Habitat Joint Venture for Bird Conservation in Eastern Oregon of 2005 have identified as Wasco Oaks.

Quoting from the journal "Oregon Habitat", Sept. 2004, "Oak Savanna is mostly in private hands, and is so threatened that 99% of it is now gone."

The Oregon Habitat Joint Venture for Bird Conservation in Eastern Oregon comprised of members representing US Fish and Wildlife Service, US Forest Service, ODFW, American Bird Conservancy, BLM, ODOT, Audubon Society, Natural Resources Conservation Service, and others gives Oak Woodland and particularly Wasco Oaks the highest priority for conservation and cites Lewis' woodpecker a resident of Wasco Oak habitat, as declining and thus listed as sensitive-critical. They recommend that existing White Oak habitat be maintained and enhanced.

The ODFW Oregon Conservation Strategy Jan. 2006 identifies Wasco Oaks as an important habitat type for as many as 200 species not mentioning numerous wildflowers, and plants some of which are species of concern. The area extends from the Columbia River up through Mt. Hood National Forest. "This area contains over 80% of the areas limited oak habitat. The strategy recommends: 1) Limit development in oak habitats and 2) Maintain and restore oak woodlands.

Upon even a casual observation of this habitat type on Seven Mile Hill one notes that the oak woodlands there are like islands in the midst of open areas. Wildlife habitually moves back and forth from "island" to "island" in search of food and cover.

Of importance to the future of this habitat on Seven Mile Hill is the extent to which the Cascade Wind Project will permanently impact it. (The appendices and tables quoted below are from

Exhibit P of UPC's application to the DOE for a Site Certificate.)

- Appendix C Land Cover and Wildlife Habitat within Two Miles of Cascade Wind Project in Exhibit P of the UPC application to DOE for a site certificate states that 60.5% of the area is forested (p. 62).
- Appendix P-2 Table 1 lists locations of turbines associated with various habitat types. This reveals that at least nine of the turbines are proposed to be sited within the oak forest.
- The application plan calls for 9.64 miles of new roads and 4.56 miles of improvements to existing roads. We are not yet shown where these will be, but it is certain that some of this 14.2 miles of road construction will occur in the oak woodland itself.
- Appendix P-4 Draft Revegetation Plan Table 1 shows that 32.02% of the forested area will be temporarily impacted and that 27.65% of the forested area will be permanently impacted. This plan further states, "A variety of environmental conditions in the study area make successful establishment of desirable plants in revegetation efforts a challenge. . . Competition with weeds for limited resources will also certainly be of concern with respect to the long-term success of the revegetation effort. In addition, meteorological concerns such as desiccation due to high winds and stochastic events in the area may further complicate the ability for desirable vegetation to establish properly."

I applaud UPC's efforts to help our earth by investing in renewable sources for our energy needs. However, given:

- 1) The importance of this habitat type for a plethora of species
- 2) The fact of this being home to several species of concern – Lewis woodpecker, Pileated woodpecker, mountain quail, several raptors, silver-haired hoary bat, Townsend bat, Mt Hood vetch, Nevius' onion to name some
- 3) The limited amount of this habitat type remaining
- 4) The classification of a substantial portion of the area as a sensitive wildlife area, namely big game winter range
- 5) The recommendation by every management and conservation group that knows anything about oak woodland that the remaining White Oak habitat be preserved and enhanced.

It seems clear that we should be working to preserve this limited habitat rather than facilitating development that will in fact destroy significant portions of it forever. It is insensitive at best to even think of siting an industrial wind energy generation facility where proposed. Seven Mile Hill is simply not the right location. I hope we all realize this sooner rather than later.

I am also concerned with the cumulative effect of what seems to be an unending add-on of more and bigger wind generators within the Klondike Wind Regime and the resultant impact upon the environment and also on the energy system overall. Please review the BPA renewable Energy Technology Roadmap from BPA Technology Innovation Office Sept 2006 Section 2.3.1 pp. 19-24.

Again, Thank you for your serious consideration of these comments.

I am sending by post a copy of this email with attached relevant pages from resources quoted above.

Respectfully,

/s/ Gary L. Casady

8/7/2007