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Via facsimile to 15032303285 and email to comment@bpa.gov

Bonneville Power Administration
Public Affairs Office- DKC-7
PO Box 14428
Portland, OR 97293-4428

Re: Environmental review of UPC's proposed Cascade Wind Interconnection Project.

Dear Bonneville Power Administration:

We write to oppose the proposed interconnection by UPC for the Cascade Industrial Wind Project because of the adverse environmental impacts this project will have on Sevenmile Hill and the surrounding areas. This project is inappropriate to the residential character of the area, and will have devastating impacts to the scenic and aesthetic resources of both Sevenmile Hill and the Columbia River Gorge National Scenic Area.

. In addition, the proposed site is located in the “**Wasco Oaks**”, one of only two oak-pine woodlands in the state that are identified for protection by the Oregon Department of Fish and Wildlife in the Oregon Conservation Strategy, January 2006. Wasco Oaks is designated for protection as area no. EC-02 in the East Cascades Ecosystem, and as area no. CP-1 in the Columbia Plateau Ecosystem.

These habitats are particularly important for bird and bat species. The bird and bat kills associated with industrial scale wind facilities are such that these facilities should not be located in sensitive bird and bat habitats like Wasco Oaks. The following ODFW profiles appear at pages 179-183, and p. 169 respectively.

“EC-02. Wasco Oaks

Extends from the Columbia River up through the Mt. Hood National Forest

Special Features:

Area contains the ODFW White River Wildlife Management Area.

Area provides winter range for mule deer.

This area contains over 80% of the ecoregion's limited oak habitat

Key Habitats:

Oak Woodlands

Key Species:

Lewis' Woodpecker

Coastal Cutthroat Trout

Winter Steelhead

Identified in other planning efforts:

American Fisheries Society Aquatic Diversity Areas
Eastern Oregon Bird Conservation Plan
Oregon Biodiversity Project Conservation Opportunity Areas

Recommended Conservation Actions:

Limit development in oak habitats
Maintain and restore oak woodlands

CP-01. The Dalles area

Special Features:

This area extends the Wasco Oaks Conservation Opportunity Area in the East Cascades ecoregion and shares many of the same features with that area.

Key Habitats:

Aquatic
Grasslands
Oak Woodlands

Key Species:

Lewis' Woodpecker
Coastal Cutthroat Trout
Winter Steelhead

Identified in other planning efforts:

Eastern Oregon Bird Conservation Plan
Oregon Biodiversity Project Conservation Opportunity Areas
The Nature Conservancy Ecoregional Assessment

We have lived on Sevenmile Hill for 17 years with our two children, now ages 14 and 18. We moved here for the abundant wildlife, the incredible scenic qualities, and the rural residential way of life. We have always been avid observers of wildlife.

Krista has always kept the binoculars and bird book close at hand. The oak-pine woodlands proposed for this project are home to many different species of birds, as well as bats. We have observed eagles, peregrine falcons, herons, red-tail hawks, cooper hawks, Kestrels (sparrow hawks), gos hawks, Lewis woodpeckers, downy woodpeckers, pileated woodpeckers, owls (including a snowy owl in winter), turkeys, raven crows, vultures, shrikes, scrub jay, stellar jay, towhee, juncos, chickadee, red poll, finches, crown sparrows, house sparrows, bluebirds, horned larks, meadow larks, swifts, barn swallows, green swallows, warblers, robins, nuthatch, wrens, flickers, mourning doves, ruffed grouse, blue grouse, grosbeak, varied thrush, various species of hummingbirds, red-winged blackbirds, ducks, snowy geese in migration, Canadian geese, western tanager, and cedar waxwings.

Several of these species, including the Lewis woodpecker, are listed sensitive species in Oregon. Others, like bluebirds, are regarded by many as indicator species and are urged for protection by ODFW through landowner incentive programs (LIP). As is the western gray squirrel, also abundant here. We also wonder, but are not sure, if the miniature rabbits we frequently see along the gravel road proposed as UPC's main access are the Pygmy Rabbit, a federally listed endangered species attributed generally to the Columbia Basin. They resemble very closely the pictures on the endangered species websites.

OTHER IMPACTS:

Public Health and Safety

In addition to concerns about safety during construction of the proposed wind farm with increased truck traffic on the steep, narrow roads that access Sevenmile Hill, the greatest public health concern is the Noise created by the operation of the turbines. Some residences are within ¼ mile of the turbines. The excess wind turbine noise is a significant health hazard to the sounding residences. Chronic sleep disturbance is the most common symptom but headaches (especially migraines), dizziness, emotional problems, irritability, increased blood pressure and other symptoms have been related to excess noise levels from wind turbines. There is also suggestion in medical writings, though yet unproven to a certainty, that low frequency sound from wind turbines produces an increased risk of cancer. Are we willing to gamble with our children?

A recent study of another UPC project, Mars Hill Wind Farm in Maine (commissioned by UPC), measured noise levels of 50 dBA and higher at similar distances from GE 1.5 MW turbines. Even these noise levels reported by UPC would violate the Oregon DEQ regulations of maximum 50 dBA at night and maximum 10 dBA increase over ambient sound levels. Independent noise evaluations must be performed rather than simply relying on the representations of the developer.

Land Use

While the proposed 40 wind turbines are themselves located on agriculturally zoned land, related supporting facilities such as the main connecting road linking the arrays, and collector lines, are located in the heart of a residential area comprised of families and children. A portion of the supporting facilities (road and collector lines) are actually located in the Columbia Gorge National Scenic Area itself. The lands abutting the proposed BPA connection and wind generation facility are rural residential and National Scenic Area.

The facility is not permissible under the requirements of the Wasco County Land Use and Development Ordinance. The project does not meet various conditional use standards in the respective zones, including, but not limited to, the requirements of compatibility with the surrounding area, and detraction from the visual character of the area.

The facility is not permissible under the requirements of the Columbia Gorge National Scenic Area. Nor under the requirements of the State of Oregon Energy Facility Siting Council, relating to, among others, prohibitions on siting facilities in or near “protected areas” such as the NSA, effect on plant and wildlife, recreation, and degradation of scenic and aesthetic resources and values.

The proposed connection and facility is also located in a long-established military flyway, which could pose significant potential problems given the approximate 400 ft. height of the turbines.

Wetlands

The UPC application indicates that they plan to upgrade Martin Road to gain access for construction and operation of the area northern array of 20 turbines. This road construction could affect the headwaters to the west fork of Rowena Creek, likely reducing or eliminating the water source for surrounding wildlife in the ponds of that tributary. The soil disturbance during construction could cause erosion and sedimentation into this stream. See the topography map showing the location of ponds and the stream north of Martin Road.

Historic/Archaeological Resources

The historic former town of Ortley, OR is now abandoned but structures still remain. It appears to qualify for listing on the National Register of Historic Places, and as an Oregon archeological site. The 20 turbines of the northern array would surround the Ortley townsite and likely destroy any opportunity to preserve this historic site for the future.

Visual Aesthetics

The proposed connection and wind generation facility would be visible for miles and miles, including many key viewing areas of the national scenic area. The impact would be devastating to the scenic and recreation resources of the Columbia River Gorge National Scenic Area and the Sevenmile Hill residential area. There is no way to mitigate the visual impact of this proposed facility.

Cumulative Impacts

BPA should not view this project in isolation. Considerable attention should be given to the cumulative impacts of existing and proposed wind generation projects, as well as future construction. U.S. Fish and Wildlife Service (USFW) has expressed the need for cumulative impacts analysis of wind development within the Columbia River migratory bird corridor in comments submitted to the State Facility Siting council. BPA's position as the federal agency that owns and operates the majority of energy transmission facilities within this region suggests the need for a substantial cumulative impacts analysis of existing, proposed, and potential wind development throughout the Columbia River corridor. Potential impacts have been outlined in letters to the Energy Facility Siting Council from the Oregon Department of Fish and Wildlife (ODFW) as well as USFW.

Conclusion

Development of wind generation facilities is not appropriate everywhere. The map of existing and proposed wind generation facilities on the BPA website illustrates the availability of wind resources east of The Dalles in areas such as Wasco and Arlington, and Windy Point on the Washington side. There is evidently ample wind resources, local support, and no conflict with the National Scenic Area and abutting residential uses. Industrial wind generation facilities should not move west so as to conflict with the National Scenic Area and surrounding residential communities.

Thank you for this opportunity to comment.

Mark and Krista Womble