

August 9, 2007

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:

I have been involved in the proposed UPC Cascade Wind Farm (UPC) with the Oregon Energy Facility Siting Council (EFSC) and have learned recently the Bonneville Power Administration (BPA) does an independent analysis of the impact of the wind project and the impact of the interconnection to BPA transmission lines. I would like to comment on the UPC application dated April 2007. I think there are significant concerns that need to be addressed before any approval for this project can be granted.

Some of my concerns include the following:

PROPOSED BPA FACILITIES:

BPA needs to evaluate the impact of the new roads, transmission lines and substation on the big game and other wildlife in that area. The facilities will likely require the clear cutting of oak and pine forested area that is habitat for several bird species. Your experts need to look into this carefully and require the developer to take appropriate steps to eliminate any impacts on these resources. The Oregon Department of Fish & Wildlife and the US Department of Fish & Wildlife both have extensive comments in before the EFSC regarding concerns they have for the project.

PROPOSED WIND GENERATION FACILITIES:

Historic/Archaeological Resources

The historic former town of Ortley, OR was originally developed in 1911 when the company sold town lots and small orchard parcels. The town quickly grew to a population of 300 and included a post office, several shops and a hotel. The town was later abandoned but several structures still remain. It is now on private land so there is no public access at this time but the local historical groups would like to have it listed on the National Register of Historic Places. It is listed on the internet as one of the few "ghost towns" in eastern Oregon. Archaeological objects is defined by ORS 358.905(1)(a) to mean objects that are at least 75 years old...and are material remains of past human life or activity" Ortley seems to qualify.

The 20 turbines of the northern array will surround the Ortley townsite and the construction will likely destroy any opportunity to preserve this historic site for the future. I have recently learned, from the great grandson of one of the Native American residents of Ortley, that “There are burial sites at Ortley that no one know about”. The construction is likely to disturb what I assume to be Indian burial sites.

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 will 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 will cause erosion and sedimentation into this stream. See the topography map showing the location of ponds and the stream north of Martin Road.

Visual Aesthetics

I am concerned about the adverse visual impact the turbines will have on the views from my property and dwelling and the general degradation of the views in the Sevenmile area. Many homes including mine have a clear view of Mt Adams, Mt Hood. Having 400 ft tall towers with moving blades and flashing lights will impact the aesthetics of the rural residential area.

Even more important, the wind farm turbines will be visible for miles and will significantly impact recreation and scenic areas of the Columbia Gorge. The map of Cascade Wind Interconnection on the BPA web site shows how close the turbines are to the National Scenic Area, Mayer State Park and other sensitive sites. From a practical stand point, there is really no way to mitigate the visual impact of this proposed facility. The structures are incompatible with the recreation, residential and scenic areas of this location. Your own publications state there is an “abundance of open, undeveloped areas in the region” east of the NSA where wind farms should be located.

Public Health and Safety

We have some real concerns about safety during construction of the proposed wind farm with increased truck traffic on the steep, narrow roads. How will emergency vehicles get access if needed? There are no provisions for how transportation issues will be handled.

The greatest public health concern is the noise created by the construction and operation of the turbines. Some residences are within ¼ mile of the turbines. My property is less than ¾ of a mile from many of the proposed turbines.

In the Record of Decision for the Big Horn Wind Energy Project, March 2005, BPA states on page 3 “two residences are in the vicinity of the site, approximately ¼ mile to the west” and on page 14 it says “the nearest residence is more than 1,000 ft...no impacts due to noise are expected”. This last statement is incorrect and shows BPA has not properly evaluated the noise impact from 1.5 MW wind turbines similar to those that are being proposed.

A recent study of the UPC project, Mars Hill Wind Farm, in Maine measured noise levels of 50 dBA and higher at similar distances from GE 1.5 MW turbines. These noise levels would violate the Oregon DEQ regulations of maximum 50 dBA at night and maximum 10 dBA increase over ambient sound levels. The excess wind turbine noise is a significant health hazard to the surrounding residences. Chronic sleep disturbance is the most common symptom but headaches (especially migraines), dizziness, emotional problems, increased blood pressure and other symptoms have been related to excess noise levels from wind turbines.

Land Use

The proposed 40 wind turbines are located on leased agricultural lands but the abutting lands are largely rural residential and NSA use. The facility is not compatible with adjacent land uses because of noise, visual impacts and other environmental impacts.

I appreciate this opportunity to comment.

Sincerely,

Betsy S. Hege