REC: 8/10/07
CW1 - 022

SUBMITTED VIA E-MAIL AND FIRST-CLASS MAIL

August 8, 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 submitted comments about the proposed UPC Cascade Wind Farm (UPC) to the Oregon Energy Facility Siting Council (EFSC) but I 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. Your letter of June 28, 2007 indicates that the deadline for public comments is August 10, 2007 and it is not clear whether there will be future opportunities to comment when the UPC application is completed. So I would like to comment at this time based on the UPC application dated April 2007. We hope the BPA extends this deadline for public comment until sometime after the UPC application is deemed complete by the EFSC and I have a better idea of UPC's intentions.

I believe the proposed UPC wind project is <u>not</u> consistent with BPA's Business Plan Plan Final Environmental Impact Statement. I am not as concerned about the facilities BPA proposes to install (substations, fences, lighting, etc) as I am the adverse impacts of the total wind project in a rural residential area near the Columbia Gorge National Scenic Area (NSA).

<u>BPA FACILITIES:</u>

BPA needs to evaluate the impact of the new roads, transmission lines and substations on the big game and other wildlife in that area. I believe this will also require clear cutting a protected White Oak and a pine forested area that is habitat for several bird species. Others with more knowledge will comment on these aspects of the project. You also need to be aware that there are archaeological sites in this area that have prevented private development in the past.

The BPA Business Plan Final EIS, Table 2.4-1 states that BPA will not provide transmission access for Columbia Basin Protected Areas resources. The proposed UPC wind project site drains into Rowena Creek, Chenoweth Creek and Mosier Creek which are all tributaries of the Columbia River which, I believe, is included in the Protected Areas List adopted by the Nothwest Power and Conservation Council. BPA and the Council have met in the past to discuss how the Northwest Power Plan will incorporate renewable resources, such as wind power, and they need to evaluate whether the proposed transmission access and the wind projects have significant adverse effects on the fish and wildlife resources of the basin. Cumulative effects of such development throughout a river basin could be quite harmful, according to the Council.

WIND PROJECT IMPACTS:

Public Health and Safety

I 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? How will my wife, a physician, get to town to treat patients if needed?

But 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. Our own house is ¾ of a mile.

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 from any project facilities. Noise (is) from opetation of the Wind Turbine Project due to aerodynamic noise of the turbine blades moving through the air, and from the gears and other machinery of the turbine. Because of the distance of the residences from the project, 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 <u>not compatible</u> with adjacent land uses because of noise, visual impacts and other environmental impacts.

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 topography maps showing the location of ponds and the unmarked steam north of Martin Road that is, in fact, a branch of the upper end of Rowena Creek. Rowena Creek empties into the Columbia River.

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 historic 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 former Native American residents of Ortley, that "There are burial sites at Ortley that no one know about". Historical records show an Indian Camp Area and the names of some of the former residents, including Charlie Pistolhead and Henry Thompson (chief). The proposed industrial construction is likely to cause the disturbance of subsurface Indian burial sites that are currently protected under the agricultural use.

Visual Aesthetics

We are, of course, concerned about the adverse visual impact the turbines will have on the views from our house and our neighbors. We have our house oriented with a clear view of Mt Adams, Mt Hood and the Columbia River (Hood River bridge). Needless to say, the 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.

Thank you for this opportunity to comment.

Sincerely,

James K Yuhas