Final Environmental Impact Statement Klondike III/Biglow Canyon Wind Integration Project

Bonneville Power Administration

September 2006

Klondike III/Biglow Canyon Wind Integration Project

Responsible Agency: U.S. Department of Energy, Bonneville Power Administration (BPA) **Title of Proposed Project:** Klondike III/Biglow Canyon Wind Integration Project

State Involved: Oregon

Abstract: BPA has been asked by PPM Energy, Inc. to interconnect 300 megawatts (MW) of electricity generated from the proposed Klondike III Wind Project to the Federal Columbia River Transmission System. Orion Energy LLC has also asked BPA to interconnect 400 MW of electricity from its proposed Biglow Canyon Wind Farm, located north and east of the proposed Klondike III Wind Project. (Portland General Electric recently bought the rights to develop the proposed Biglow Canyon Wind Farm from Orion Energy, LLC.) Both wind projects received Site Certificates from the Oregon Energy Facility Siting Council on June 30, 2006.

To interconnect these projects, BPA would need to build and operate a 230-kV double-circuit transmission line about 12 miles long, expand one substation and build one new substation. The wind projects would require wind turbines, substation(s), access roads, and other facilities.

Two routes for the transmission line are being considered. Both begin at PPM's Klondike Schoolhouse Substation then travel north (Proposed Action) or north and westerly (Middle Alternative) to a new BPA 230-kV substation next to BPA's existing John Day 500-kV Substation.

BPA is also considering a No Action Alternative in which BPA would not build the transmission line and would not interconnect the wind projects.

The proposed BPA and wind projects would be located on private land, mainly used for agriculture. If BPA decides to interconnect the wind projects, construction of the BPA transmission line and substation(s) could commence as early as the winter of 2006-07. Both wind projects would operate for much of each year for at least 20 years.

The proposed projects would generally create no or low impacts. Wildlife resources and local visual resources are the only resources to receive an impact rating other than "none" or "low." The low to moderate impacts to wildlife are from the expected bird and bat mortality and the cumulative impact of this project on wildlife when combined with other proposed wind projects in the region. The low to high impacts to visual resources reflect the effect that the transmission line and the turbine strings from both wind projects would have on viewers in the local area, but this impact diminishes with distance from the project.

BPA described and analyzed the proposed action and alternatives in a draft environmental impact statement (DEIS) released in April 2006. This final environmental impact statement (FEIS) contains the changes made to the DEIS, comments received on the DEIS, and BPA's written responses to the comments (see Chapter 10). Additions to the EIS text are underlined. Deletions are not marked. Additional appendices have been added to respond to public comments.

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For additional copies of this document, please call 1-800-622-4520 and ask for the document by name. The draft and final EISs are also on the Internet at:

http://www.efw.bpa.gov/environmental_services/Document_Library/Klondike/. Or you can request additional copies by writing to:

Bonneville Power Administration P. O. Box 3621 Portland, Oregon 97208 ATT : Public Information Center - CHDL-1

For additional information on DOE NEPA activities, please contact Carol M. Borgstrom, Director, Office of NEPA Policy and Compliance, EH-42, U.S. Department of Energy, 1000 Independence Avenue S.W., Washington D.C. 20585, phone: 1-800-472-2756 or visit the DOE NEPA Web site at <u>www.eh.doe.gov/nepa</u>.

Summary

In this Summary:

- Purpose and Need for Action
- Alternatives
- Affected Environment
- Impacts

This summary covers the major points of the <u>final</u> Environmental Impact Statement (<u>FEIS</u>) prepared for the Klondike III/Biglow Canyon Wind Integration Project proposed by the Bonneville Power Administration (BPA). The project includes constructing a new double-circuit 230-kilovolt (kV) transmission line in northern Sherman County, Oregon. The new line would connect the Klondike III Wind Project and the Biglow Canyon Wind Farm to BPA's existing John Day 500-kV Substation. The project would also require expansion of BPA's existing John Day 500-kV Substation and a new 230-kV substation to integrate the two wind projects.

As a federal agency, BPA is required by the **National Environmental Policy Act** (NEPA) to assess the impacts that its actions may have on the environment. BPA's proposal to construct a transmission line and substation requires that it assess the potential environmental effects of the proposed project, describe them in an EIS, make the EIS available for public comment, and consider the impacts and comments when deciding whether to proceed with the project.

BPA described and analyzed the proposed action and alternatives in a draft environmental impact statement (DEIS) released in April 2006. This FEIS contains the changes made to the DEIS, comments received on the DEIS, and BPA's written responses to the comments (see Chapter 10). Additions to the EIS text are underlined. Deletions are not marked. Additional appendices have been added to respond to public comments.

S.1 Purpose and Need for Action

S.1.1 Background

Two companies, PPM Energy, Inc. (PPM) and <u>Portland General Electric (PGE)¹</u> want to develop wind resources in Sherman County, Oregon and have submitted transmission interconnection requests to BPA for interconnection of the output of their respective projects – Klondike III Wind Project and Biglow Canyon Wind Farm. BPA

¹ In July 2006, Portland General Electric bought the rights to develop the Biglow Canyon Wind Farm from Orion Energy, LLC. References to Orion have been changed to PGE throughout this document to reflect this change.

needs to respond to these requests. If BPA decides to interconnect the wind farms, BPA needs to decide how best to integrate them into the regional transmission grid.

S.1.2 BPA's Purposes

Purposes are goals to be achieved while meeting the need for the project. These objectives are used to evaluate alternatives proposed to meet the need. BPA will use the following purposes to choose among the alternatives.

- Maintain transmission system reliability to industry standards;
- Act consistently with BPA's statutory obligations;
- Continue to meet BPA's contractual obligations;
- Minimize environmental impacts;
- Minimize costs; and
- Encourage development of renewable energy resources.

S.2 Alternatives

S.2.1 Proposed Action

BPA's Proposed Action is to: (1) enter into interconnection agreements with PPM and <u>PGE</u> for their proposed wind projects; and (2) construct and operate a new doublecircuit 230-kV transmission line and ancillary facilities from the proposed wind projects to BPA's John Day 500-kV Substation. These actions would allow the proposed wind projects to be interconnected with the Federal Columbia River Transmission System. The preferred route for the new BPA transmission line is the North Alternative (see Map 1). The 12-mile long line would generally extend north from PPM's Klondike Schoolhouse Substation for about 5.3 miles, and then west for the remaining 6.7 miles to the John Day Substation. PPM's Klondike III project would be tied into the new line at Klondike Schoolhouse Substation. The Biglow Canyon Wind Farm would connect to the line at a new substation built by <u>PGE</u> located in between Klondike and the new John Day 230-kV Substation.

S.2.2 Middle Alternative

The Middle Alternative would originate from the same location as the Proposed Action (see Map 1), but would follow a different route to the new 230-kV substation. This alternative would be about 12.5 miles long. The Middle Alternative has all the components of the Proposed Action, but uses a different route.

S.2.3 Wind Power Projects

Klondike III Wind Project facilities would consist of up to 165 wind turbines and towers, about 19 miles of new roads, <u>up to two</u> operations and maintenance (O&M) facilities, and <u>one</u> substation. Wind turbines and roads would be built within corridors <u>approved by the Oregon Department of Energy</u>.

The Biglow Canyon Wind Farm would consist of up to 225 wind turbines and towers, about 40 miles of new roads, an O&M facility, and a substation. Wind turbines and roads would be built within 500-foot-wide corridors.

Both wind projects received Site Certificates from the Oregon Energy Facility Siting Council on June 30, 2006.

S.2.4 No Action Alternative

The No Action Alternative is often called the no-build alternative. Under this alternative, BPA would not sign interconnection agreements with PPM and <u>PGE</u>, and would not construct a new BPA substation, expand the existing John Day 500-kV Substation, or construct a transmission line. The environmental impacts described for each of the BPA action alternatives would not occur. In addition, it is likely that both PPM's and <u>PGE</u>'s proposed wind projects would not be built since there appears to be no feasible interconnection option for these projects other than the FCRTS.

S.3 Affected Environment

S.3.1 Land Use

Most of the analysis area (and Sherman County) is under dryland wheat or barley production, with some areas of open range for cattle. Portions of the county and analysis area are also enrolled in the Conservation Reserve Program (CRP), a voluntary federal program to assist private landowners to convert highly erodible and environmentally sensitive cropland to permanent vegetative cover.

Nearly all of Sherman County is zoned F-1 (Exclusive Farm Use), as is the analysis area, except for some isolated nodes of commercial, industrial, and residential zoning designations in and around the city of Wasco. The F-1 zone restricts most development to preserve land for agriculture or resource extraction. The area is sparsely populated, with a few single-family residences in the project area.

S.3.2 Transportation

The state highways generally function as major or principal arterials through Sherman County. US 97 is classified as a major arterial; OR 206 from Wasco to the John Day River is classified as a minor arterial; and OR 206 from the Deschutes River to Wasco and OR 216 are classified as major collectors. Major collectors and minor arterials serve regional and local traffic demands. The primary difference between the two classifications is daily traffic volume.

I-84 is the main east-west highway through north central Oregon and the analysis area.

S.3.3 Recreation

In general, recreational activities in the county include camping, hiking, upland bird and big game hunting, rafting, boating, fishing, sightseeing, nature and wildlife photography, and bicycling. Water-based recreation activities occur on the nearby John Day River. Recreational opportunities in the analysis area are generally limited to "access by permission only" upland bird and deer hunting on private property and viewing historic trail alignments from county roads.

No important recreational facilities or opportunities exist along the proposed transmission line routes, substation sites, or within the two proposed wind power site boundaries.

Three important recreational facilities are within the vicinity of the proposed projects, but are outside the immediate project boundaries: the John Day River Corridor, the Journey Through Time Scenic Byway, and the Historic Oregon Trail and Barlow Road Cutoff Trail alignments.

S.3.4 Geology and Soils

The analysis area is in the Deschutes-Columbia Plateau physiographic province, a north-sloping, volcanic plateau that covers over 60,000 square miles in Oregon, Washington, and Idaho. Volcanic rocks mapped as Columbia River Basalt Group underlie nearly the entire province. Most of the analysis area is mantled by brown, fine-grained, silty soils, referred to as loess. The thickness of loess observed in road cuts is typically 4 to 6 feet.

Soils are susceptible to accelerated erosion caused by disturbance of natural conditions through burning, excessive grazing, or tillage. These disturbances increase the potential for erosion by wind and water. Wind typically presents the greatest source of erosion due to the arid climate.

S.3.5 Water Resources and Wetlands

Most of the analysis area is in dry land wheat production. Very little acreage of native plant communities remains, occurring in small patches along tributaries.

There are no floodplains mapped by the Federal Emergency Management Agency (FEMA) within the projects' study areas (FEMA, 1984).

The principal ground water uses in the county are for public supply, domestic and commercial, agriculture, and industrial (USGS, 2006).

Within the analysis area, two jurisdictional wetlands and six jurisdictional drainage crossings (a jurisdictional wetland or drainage is one that is considered a water of the state and regulated by the Oregon Department of State Lands and/or the Army Corps of Engineers) were identified. Many other non-jurisdictional drainages were also identified in the analysis area, however these drainages are not regulated and most have been affected by agricultural practices such as plowing and no channels exist.

S.3.6 Fish and Wildlife

Elk, mule deer, bighorn sheep, pronghorn, and very common species such as coyote and badger are known to occur in the vicinity. Many common avian species such as horned lark and meadowlark are also regularly found within the area.

Bald eagles are the only species listed under the federal Endangered Species Act (ESA) that is present near the analysis area. The bald eagle is federally listed as threatened. It is also listed as threatened by the State of Oregon. In the project vicinity, bald eagles are primarily found along the Columbia River corridor; no bald eagle use of the upland areas within and/or near the analysis area has been observed.

Peregrine falcons also occur in the analysis area. The peregrine falcon was removed from the federal ESA in 1999 but remains listed as endangered by the State of Oregon. Peregrine falcons are limited to areas that contain suitable nesting ledges. Cliffs and bluffs typically found along river courses and other large bodies of water usually provide habitat for nesting peregrines. No peregrine falcon nests are located in the project area.

No listed fish or fish habitat occur within the project area.

S.3.7 Vegetation

The following vegetative communities are found in the analysis area: upland trees, shrub-steppe, CRP, and agriculture. No threatened or endangered plant species were identified in the analysis area. There are no records of any rare or special status species within the analysis area.

S.3.8 Visual Resources

The general landscape character features rolling hills in dry land winter wheat production or grasses. The Deschutes River Canyon and John Day River Canyon are important visual features. Basalt cliffs and rock outcrops are typical within the river canyons. Where vegetation is not in agricultural production or CRP, it is shrub-steppe habitat typical to central Oregon. Trees are sparse, usually occurring in ravines or near the few home sites in the area. Multiple transmission and distribution lines, as well as

highways, cross the area. Existing wind turbines and substation facilities are also visible.

Important visual resources within 30 miles include the Columbia River Gorge National Scenic Area, the John Day River Canyon, the Oregon National Historic Trail, the Lower Deschutes River Canyon, the Lower Klickitat River Canyon, and the Journey Through Time Scenic Byway.

S.3.9 Socioeconomics

The project area is entirely within Sherman County, which has four incorporated communities: Grass Valley, Moro, Rufus and Wasco. Rufus and Wasco are the only two towns near the proposed project; Moro (county seat) and Grass Valley are in the southern portion of the county. The estimated 2003 population for Sherman County is 1,900 residents. Wasco is the largest community in the county with about 380 residents.

S.3.10 Cultural Resources

Two archaeological resources were found within the Proposed Action corridor, and two resources were found within the proposed Middle Alternative corridor. No historic or archeological resources were identified near BPA's proposed substation site.

At the proposed Klondike III Wind Project site, field surveys identified <u>seven</u> archaeological resources. At the proposed Biglow Farm site, field surveys identified three historic sites and one historic archaeological site.

S.3.11 Noise, Public Health and Safety

Transmission facilities and wind projects provide electricity for heating, lighting and other services essential for public health and safety. These same facilities can potentially harm humans. Contact with transmission lines or turbines can kill or injure people and damage aircraft. Existing transmission lines and wind projects in the area have the potential for public health and safety concerns such as electric shock, fires, and electric and magnetic fields.

S.3.10 Air Quality

Sherman County has the lowest total emissions of any county in Oregon and is classified as an attainment area.

S.4 Impacts

S.4.1 Land Use

The **Proposed Action** would be entirely within land zoned F-1 (Exclusive Farm Use). BPA would acquire easements for a 125 feet wide right-of-way to build, operate and maintain the proposed transmission line. The substation expansion area (15 acres) would be acquired in fee. BPA would also purchase easements for access roads.

The proposed transmission line is about 12 miles long. Transmission line towers would be placed about 900 feet apart, requiring about 71 towers (61 steel tubes, 10 steel lattice towers). Land use impact would be **low**.

The **Middle Alternative** would originate from the same location as the Proposed Action, but would follow a different route to the proposed John Day 230-kV Substation. This alternative would be about 12.5 miles long. Except for the different route, the Middle Alternative would have the components of the Proposed Action. Land use impact would be **low**.

The No Action Alternative would have no land use impact:

The **Klondike III Wind Project** would require about <u>62</u> acres of land to be permanently removed from farm use. About 129,000 acres are farmed within the Sherman County area, so the amount permanently removed from production would be less than 0.1 percent. Land use impact would be **low**.

The **Biglow Canyon Wind Farm** would require that about <u>157</u> acres be permanently removed from farm use. This would account for less than 0.1 percent of existing acreage in barley and wheat production. Land use impact would be **low**.

S.4.2 Transportation

For the **Proposed Action**, no construction would occur within existing road rightsof-way. Construction equipment and supply vehicles would use the existing state highway system and county roads to reach the construction area. The transmission line would be outside of existing road right-of-way and would not hinder any future expansion of the road. Some road improvements may be necessary to accommodate constructionrelated equipment or to repair sections of road damaged by heavy equipment and construction-related traffic. During construction, temporary, short-term disruption to traffic could occur, although the level of the impact would be low because of existing low traffic volumes within the area. Disruption of existing traffic patterns would likely be caused by construction traffic entering and leaving county roads to access construction areas. Transportation impacts would be **low**.

The **Middle Alternative** would have similar impacts as the Proposed Action. Transportation impacts would be **low**.

The No Action Alternative would have no transportation impact.

The **Klondike III Wind Project** would not interfere with any future improvement to the local transportation system. Some of the local roadways would require improvements, which would generally be a 6-inch gravel layer placed on top of the existing road prior to project construction to accommodate the length and weight of vehicles that would deliver the turbine pieces and machinery necessary for construction. Construction-related traffic could cause short-term traffic delays when trucks deliver construction-related equipment and the turbines, but those delays would be temporary and are not anticipated to have an adverse impact on highways in the area. Transportation impacts would be **low**.

The **Biglow Canyon Wind Farm** would have similar impacts to the transportation facilities as the Klondike III Wind Project. Transportation impacts would be **low**.

S.4.3 Recreation

None of the nearby recreational facilities – the John Day River, the Journey Through Time Scenic Byway, and the historic Oregon Trail – would be removed or relocated under the **Proposed Action** or **Middle Alternative**. However, visual impacts to recreational resources could occur, particularly in areas where the landscape is relatively flat and views are unobstructed by trees or natural features. There would be no direct loss of opportunity as a result of the action alternatives; however, views could be altered from those areas. Recreation impacts would be **Iow**.

The No Action Alternative would have no recreation impact.

None of the recreational facilities – the John Day River, the Journey Through Time Scenic Byway, and the historic Oregon Trail - would be removed or relocated by the **Klondike III Wind Project** or the **Biglow Canyon Wind Farm**. However, visual impacts to recreational resources could occur, particularly in areas where the landscape is relatively flat and views are unobstructed by trees or natural features. Views could be altered from those areas. Recreation impacts would be **Iow**.

S.4.4 Geology and Soils

Geologic conditions are relatively stable and suitable for both the **Proposed Action** and **Middle Alternative**. Rock is present at shallow depths and the groundwater table is relatively deep. Developing the proposed project would not affect geologic conditions. Most of the project site consists of agricultural fields where bare soils are often exposed to wind and water. Based on the soil types present, soil erosion potential ranges from highly erodible to not highly erodible; however, neither alternative would appreciably increase the amount of exposed soils. Geology and soils impacts would be **low**.

The No Action Alternative would have no geology and soils impacts.

The **Klondike III Wind Project** and the **Biglow Canyon Wind Farm** would be located on land with similar geologic and soil characteristics as the Proposed Action and Middle Alternative. Geology and soils impacts would be **low**.

S.4.5 Water Resources and Wetlands

The **Proposed Action** is located far from any of the wetlands identified in the analysis area and no impacts to wetlands would occur. The three jurisdictional drainages crossed by the Proposed Action would be spanned, and no access roads would be constructed across them. **No** impacts to surface waters would result from the project.

The **Middle Alternative** is located far from any of the wetlands identified in the analysis area and no impacts to wetlands would occur. The three jurisdictional drainages crossed by the Middle Alternative would be spanned, and no access roads would be constructed across them. **No** impacts to surface waters would result.

The No Action Alternative would have no water resources or wetlands impacts.

The **Klondike III Wind Project** would avoid all impacts to wetlands and drainages and would create **no** water resources and wetlands impacts.

The **Biglow Canyon Wind Farm** would limit impacts to minor disturbances of nonjurisdictional drainages, a **low** impact.

S.4.6 Fish and Wildlife

Undeveloped habitats would be spanned by structures or avoided by route design for the **Proposed Action** and **Middle Alternative**. There would be **no** impact to listed species.

Bird fatalities could result from impacts with overhead ground wires during foggy conditions, and from increased road traffic along access roads during construction. Temporary, construction-related impacts could disturb raptors and other birds, coyotes, jackrabbits, ungulates (e.g., deer and elk), and other common species, such as reptiles. Although temporary disturbance to such species during critical life stages (e.g., breeding and rearing) would be a **moderate** impact, seasonal restrictions on construction in sensitive areas would reduce the level of impact to **low**.

One small area of upland tree habitat east of Scott Canyon Road was found to contain a Swainson's hawk nest along a public road near the **Proposed Action**. Since seasonal restrictions would be implemented if the nest was found to be active, impact levels would be **Iow**. The **Middle Alternative** would not disturb this nest. Impacts would be **Iow**.

The No Action Alternative would create no fish and wildlife impacts.

The **Klondike III Wind Project** and the **Biglow Canyon Wind Farm** would both be in areas almost entirely in agricultural wheat production. Loss of terrestrial wildlife habitat from land conversion would be minimal (a **low** impact). Temporary disturbance to terrestrial species during critical life stages could occur (a **moderate** impact). Bird and bat fatalities could result from impacts with turbine blades, a **moderate** impact.

S.4.7 Vegetation

The **Proposed Action** would affect only agricultural areas in the long term. Towers and substation facilities would remove about 17 acres of agricultural plant communities, which are very common in the region. The **Middle Alternative** would also remove about 17 acres of agricultural plant communities. Undeveloped habitats (i.e., not in agricultural use) would be spanned by structures or avoided. Areas disturbed during construction would be replanted, and mitigation measures would be implemented to control the spread of noxious weeds. Vegetation impacts would be **Iow**.

The No Action Alternative would create no vegetation impacts.

The **Klondike III Wind Project** would permanently affect about <u>0.01</u> acres of grasslands, <u>no</u> shrub-steppe, <u>6.8</u> acres of CRP lands, and <u>62</u> acres of agricultural land. Temporary impacts from the project would affect about <u>3.2</u> acres of grasslands, <u>2.0</u> acres of shrub-steppe, <u>38.8</u> acres of CRP lands, and <u>250</u> acres of agricultural lands. The temporary disturbance areas would be revegetated with similar vegetation. The undeveloped habitats disturbed by the project would be mitigated nearby. Vegetation impacts would be **Iow**.

The **Biglow Canyon Wind Farm** would permanently affect about <u>0.88</u> acres of grasslands, 0.25 acres of shrub-steppe, <u>10.1</u> acres of CRP lands, and <u>156.7</u> acres of agricultural land. Temporary impacts from the project would affect about 1.0 acres of grasslands, 1.5 acres of shrub-steppe, <u>16.5</u> acres of CRP lands, and <u>363</u> acres of agricultural lands. The temporary disturbance areas would be revegetated with similar vegetation. The undeveloped habitats disturbed by the project would be mitigated nearby. Vegetation impacts would be **low**.

S.4.8 Visual Resources

The **Proposed Action** and **Middle Alternative** would be visible from many locations in the analysis area at distances ranging from the immediate foreground (less than 100 feet) to the distant background (greater than 20 miles). The proposed facilities would be visible in the foreground and middle ground from local residences. Visual resources impact in the general vicinity would be **moderate**.

Portions of the **Proposed Action** and **Middle Alternative** would potentially be visible from the Columbia River Gorge National Scenic Area. The alternatives would not be seen from the John Day River Canyon, Oregon National Historic Trail High Potential Sites, Lower Deschutes River Canyon, or Lower Klickitat River Canyon. They would be visible but not obtrusive in the view from the Journey Through Time Scenic Byway. Visual resources impact to important visual resources would be **low to none**.

The No Action Alternative would create no visual resources impacts.

The **Klondike III Wind Project** and the **Biglow Canyon Wind Farm** would be visible from many locations in the analysis area at distances ranging from the immediate foreground to the distant background.

The proposed facilities would be visible in the foreground and middle ground of local residences and from local roads. Visual resources impact in the general project vicinity would be **moderate to high**.

The **Klondike III Wind Project** and the **Biglow Canyon Wind Farm** would be seen from some of the sensitive receptor described above, but generally in the distant background. Visual resources impacts to important visual resources would be **low to moderate**.

S.4.9 Socioeconomics

Construction of the **Proposed Action** and **Middle Alternative** would require construction workers to temporarily relocate to the project vicinity and would also require hiring local workers. Businesses in the area would benefit from goods and services sold to construction workers. Temporary population increases during construction would not exceed current capacities for housing and public services. Landowners would be compensated for impacts to farmland or crops during construction, as well as for land and easement acquisition. The transmission line routes were designed to minimize impacts to farming activities. Socioeconomics impacts would be **positive**.

The No Action Alternative would create no socioeconomics impacts.

Construction of the **Klondike III Wind Project** and the **Biglow Canyon Wind Farm** would require construction workers to temporarily relocate to the project vicinity and would also require hiring local workers. Businesses in the area would benefit from goods and services sold to construction workers. Temporary population increases during construction would not exceed current capacities for housing and public services. Landowners would be compensated for impacts to farmland or crops during construction, as well as for land and easement acquisition. The wind turbine and distribution line alignments were located to minimize impacts to farming activities. Socioeconomics impacts would be **positive**.

S.4.10 Cultural Resources

The archaeological survey and records review for the **Proposed Action** and **Middle Alternative** indicate that most of the previous studies and recorded sites are along the Columbia, Deschutes, and John Day rivers, outside the Proposed Action analysis area. Historic-period documents indicate that the Oregon Trail crossed both alternative routes, but field surveys did not identify any evidence of the trail primarily because much of the analysis area is cultivated or right-of-way and has been previously disturbed.

The archeological sites identified within the project corridor could be affected by the construction of the **Proposed Action** or **Middle Alternative**, though the archeological sites are small, and it is likely that placement of the towers could avoid the identified resources. Cultural Resources impacts would be **low**.

The No Action Alternative would create no cultural resources impacts.

The archeological sites identified within the Klondike III Wind Project and the **Biglow Canyon Wind Farm** areas would not be affected. Placement of the towers and access roads would avoid the identified resources. Cultural Resources impacts would be **Iow**.

S.4.11 Noise, Public Health and Safety

The proposed transmission line and substation and the proposed wind projects could create potential noise, safety and health impacts. The projects would be designed to reduce this potential so that predicted impacts would be **low**.

S.4.12 Air Quality

The **Proposed Action** and the **Middle Alternative** would create temporary impacts to air quality. Construction activities would generate dust and airborne particulates and small amounts of carbon monoxide (CO). Impacts would be **low**.

The No Action Alternative would create no impacts.

The **Klondike III** and **Biglow Canyon** projects would create similar impacts. Construction-related impacts would be similar to those described under the Proposed Action. Construction-related impacts would be from construction of the concrete pads for the turbines, staging areas and temporary access roads.

Permanent operations and maintenance staff would drive to the site daily, likely using gasoline- or diesel-powered vehicles that would generate CO. The exhaust from those vehicles would have almost no impact to air quality in the area considering current air quality and the small number of trips from operations and maintenance staff (15 to 20 employees) needed to operate each facility.

Operations and maintenance staff would perform periodic maintenance on the turbines, requiring equipment to drive along gravel or dirt roads along the turbine strings. Depending on the amount of moisture within the soils, some dust could be generated. No long-term impacts are anticipated because the dust generated from those activities would be minimal, particularly when compared to the much higher levels of dust generated from ongoing farming activities in the surrounding area. CO emissions from the small number of maintenance vehicles required would also be minimal and temporary.

S.4.13 Cumulative Impacts

Although much of the project area has remained as undeveloped rangeland, agricultural and other rural development has occurred in the past two centuries. Typical past development includes large grain farms, irrigated row crop farms, specialty crop enterprises such as orchards and vineyards, and small rural communities. Various types of roads and utility infrastructure also have been developed. This type of development continues in present times and likely will continue into the future. A more recent type of development to occur in the area has been wind farms.

Construction, operations and maintenance of the transmission facilities and wind projects are expected to have a low to moderate impact on most resources within Sherman County. The low to moderate impacts to wildlife are from the expected bird and bat mortality and the cumulative impact of this project on wildlife when combined with other proposed wind projects in the region. The low to high impacts to visual resources reflect the effect that the transmission line and the turbine strings from both wind projects would have on viewers in the local area, but this impact diminishes with distance from the project. In the future, additional impacts to all resources could result from other development.

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Chapter 1 - Purpose and Need

In this Chapter:

- The Need for Action
- Purposes (Decision Factors)
- Wind Project Siting Issues
- Scoping and Major Issues
- Organization of the EIS

Bonneville Power Administration (*BPA*)², a federal agency, owns and operates more than 15,000 circuit miles of electric *transmission lines*, including most of the *high-voltage* (115-*kilovolt* [*kV*] and above) lines in the Pacific Northwest. BPA's transmission system, known as the Federal Columbia River Transmission System (FCRTS), is operated in part, to "integrate and transmit the electric power from existing or additional federal or non-federal generating units" that are developed in the region.³ Depending on the location of a proposed power generation project being developed in the region, interconnection of the project to the FCRTS may be essential for effective delivery of power generated by the project to loads in the Pacific Northwest and elsewhere.

Two companies, PPM Energy, Inc. (PPM) and <u>Portland General Electric (PGE)⁴</u> have proposed the construction and operation of two separate wind farm projects to generate power in Sherman County, Oregon. PPM's proposed project is referred to as the Klondike III Wind Project, and <u>PGE's</u> proposed project is referred to as the Biglow Canyon Wind Farm. Both proposed projects are in the vicinity of existing BPA transmission lines running along the lower Columbia River that are part of the FCRTS. As part of their proposals, both PPM and <u>PGE</u> have requested that BPA integrate power produced from their respective projects into the FCRTS at BPA's existing John Day 500-kV **Substation**.

² Words in bold and italics are defined in Chapter 9, Glossary and Acronyms.

³ 16 U.S.C. 838b.

⁴ In July 2006, Portland General Electric bought the rights to the Biglow Canyon Wind Farm from Orion Energy, LLC. References to Orion have been changed to PGE throughout this document to reflect this change.

1.1 BPA's Need for Action

BPA has adopted an Open Access Transmission Tariff for the FCRTS consistent with the Federal Energy Regulatory Commission's (FERC) *pro forma* open access tariff.⁵ Under BPA's tariff, BPA offers transmission interconnection to the FCRTS to all eligible customers on a first-come, first-served basis, with this offer subject to an environmental review, such as this *environmental impact statement* (EIS), under the National Environmental Policy Act (NEPA). BPA must also evaluate how any new interconnection services would maintain reliable service to existing and foreseeable future customers.

As discussed above, both PPM and <u>PGE</u> have submitted generation interconnection requests for their respective projects to BPA for interconnection with the FCRTS.⁶ Consistent with its tariff, BPA needs to respond to PPM's and <u>PGE</u>'s requests and decide if it will provide interconnection for their projects into the regional transmission grid. More specifically, BPA needs to decide if it will enter into Large Generator Interconnection Agreements (LGIAs) to interconnect the proposed power generation projects into the FCRTS. BPA also needs to decide if it will provide transmission services to these projects through transmission service agreements.

In addition, granting an interconnection of these projects to the FCRTS would require that BPA construct and operate a new 230-kV transmission line and ancillary facilities from the projects to BPA's John Day 500-kV Substation. Accordingly, BPA needs to decide whether and where to construct such a line and other facilities.

1.2 BPA's Purposes

The purposes in the "purpose and need" statement are goals to be pursued while meeting the need for the project. These goals are important factors used to compare and contrast the alternatives evaluated in detail in the EIS. BPA will use the following purposes to choose among the alternatives:

- Maintain transmission system reliability to industry standards;
- Act consistently with BPA's statutory obligations;
- Continue to meet BPA's contractual obligations;
- Minimize environmental impacts;
- Minimize costs; and
- Encourage development of renewable energy resources.

⁵ Although BPA is not subject to FERC jurisdiction, BPA follows the open tariff as a matter of national policy. This course of action demonstrates BPA's commitment to non-discriminatory access to its transmission system and ensures that BPA will receive non-discriminatory access to the transmission system of utilities that are subject to FERC jurisdiction.

⁶ PPM's interconnection request, submitted to BPA in February 2004, is for up to 300 megawatts (MW) of the output from its proposed project; <u>PGE</u>'s interconnection request, submitted to BPA in April 2002, is for up to 400 MW of the output from its proposed project.

1.3 Wind Project Siting Issues

The wind projects proposed by PPM and <u>PGE</u> would be in the state of Oregon. Because of the proposed generating *capacity* of each of the wind projects, both projects are under the jurisdiction of the Oregon Energy Facility Siting Council (EFSC), which has siting authority over the projects. Accordingly, PPM and <u>PGE</u> must each obtain a site certificate from Oregon EFSC before constructing or operating their respective projects.⁷ A site certificate is a binding agreement between the State of Oregon and an energy facility applicant that authorizes the applicant to construct and operate a facility on an approved site, incorporating all conditions imposed by the Council on the applicant. As part of the site certificate approval process, Oregon EFSC must find that the proposed projects meet certain standards, including environmental standards, pursuant to Oregon Administrative Rule (OAR) Chapter 345, Division 21, Section 045. The following describes the Oregon EFSC siting process to date for each of the proposed wind projects.

1.3.1 Klondike III Wind Farm

PPM proposes to build and operate the Klondike III Wind Project near the town of Wasco, in Sherman County, Oregon, next to its existing Klondike I and II wind projects. PPM proposes the construction and operation of up to 165 wind turbines, all on privately-owned land, as part of this project. The facility would have an electric generating capacity of about <u>289</u> *megawatts* (MW) (see request for amendment below).

PPM submitted an Application for Site Certificate (ASC) for its proposed wind project to Oregon EFSC on May 13, 2005. The ASC was deemed complete by Oregon EFSC on February 6, 2006. Oregon EFSC then issued public notice of the ASC and accepted comments. <u>On June 30, 2006, Oregon EFSC issued a final order on PPM's ASC, as well as a Site Certificate. The Site Certificate authorizes construction and operation of the Klondike III Wind Project, subject to the terms and conditions set forth in the final order and Site Certificate. The final order is included as Appendix F to this EIS, and the <u>Site Certificate is Appendix G.</u></u>

<u>After the final order and Site Certificate were issued, PPM requested an Amendment</u> to the Site Certificate to ask the EFSC to approve the following:

- 1. <u>Authorize realignment of some of the turbine strings and access roads; add an alternate location for the Operations & Maintenance building; and increase the area of temporary disturbance.</u>
- Authorize the use of turbines that would have a peak generating capacity of up to 2.4 megawatts for part of the project (about 62 of the proposed 165 turbine locations).

⁷ While Oregon EFSC has siting jurisdiction over the proposed wind projects, it has no involvement in the siting, construction or operation of BPA's transmission lines and appurtenant facilities.

- 3. <u>Increase the authorized peak generating capacity of the facility from 272.25</u> <u>megawatts to about 289 megawatts.</u>
- 4. Modify site certificate conditions consistent with the changes described above.

This request is currently <u>being reviewed by EFSC. The proposed changes in the</u> project requested in the Amendment are further described, and the impacts evaluated, in this Final EIS. Review of the <u>Amendment to</u> PPM's <u>Site Certificate by EFSC</u> is expected to occur concurrently with BPA's EIS review process.

1.3.2 Biglow Canyon Wind Farm

<u>PGE</u> proposes to build and operate the Biglow Canyon Wind Farm in Sherman County, Oregon. <u>PGE</u> proposes the construction and operation of up to 225 wind turbines, all on privately-owned land, as part of this project. The facility would have an electric generating capacity of about 400 MW.

<u>The Biglow Canyon ASC was</u> submitted to Oregon EFSC on October 12, 2005. The ASC was deemed complete by Oregon EFSC on <u>March 20,</u> 2006. <u>Oregon EFSC then</u> issued public notice of the ASC and accepted comments. On June 30, 2006, Oregon EFSC issued a final order on the ASC, as well as a Site Certificate. The Site Certificate authorizes construction and operation of the Biglow Canyon Wind Farm, subject to the terms and conditions set forth in the final order and Site Certificate. The final order is included as Appendix H to this EIS, and the Site Certificate is Appendix I.

1.4 Scoping and Major Issues

Scoping refers to a time early in the development of an EIS when the public tells BPA what issues should be considered. On February 11, 2005, BPA published a **Notice of Intent** (NOI) in the Federal Register to prepare an EIS for BPA's proposed actions related to the proposed Klondike III Wind Project. This NOI also announced BPA's intent to hold a public scoping meeting on March 1, 2005 in Wasco, Oregon and set May 13, 2005 as the date for the close of the public scoping comment period. The NOI was posted on a BPA Web site created specifically for posting information and updates related to the EIS.

In addition to the NOI, three letters (dated February 11, 2005, February 24, 2005, and April 12, 2005) were mailed to people potentially interested in or affected by the proposal. These letters explained the proposal, the environmental impact statement process, and how to participate. A comment sheet was included so people could mail their comments to BPA.

BPA also purchased ads in local newspapers announcing the scoping meeting.

As indicated in the NOI, BPA held a public scoping meeting on March 1, 2005 in Wasco, Oregon to describe BPA's proposed action and accept any scoping comments. PPM representatives were also present at this meeting to discuss their proposed wind project. A second scoping meeting, also in Wasco, was held on April 27, 2005.

During the initial scoping period, BPA received comments suggesting that the Biglow Canyon Wind Farm be added to the EIS because it was planned to be built near the Klondike III Wind Project. Based on this public feedback and a request from <u>PGE</u> for interconnection, BPA decided to include interconnection of the Biglow Canyon Wind Farm in the EIS being developed for the interconnection of the Klondike III Wind Project. BPA then reopened and extended the scoping comment period for the EIS until January 5, 2006. BPA announced this extension by publishing a *Notice of Extension of Comment Period for an Environmental Impact Statement* in the Federal Register on December 6, 2005. BPA also mailed a letter on December 2, 2005 to people potentially interested in or affected by the proposal announcing the extended comment period, and posted notice of the extension on the BPA Web site for the EIS.

As a result of the scoping process, various written and verbal comments were collected. Comments covered many issues:

- Need for the project;
- Economic benefits and impacts;
- Adverse environmental impacts of a transmission line, including interruption of farming practices;
- Bird and bat collisions with the wind facilities;
- Visual impacts;
- Possible routes for the transmission line.
- Location of the substation facilities.

This is a partial list of issues identified from the comments received. All comments received were logged in, and forwarded to resource specialists to include in their environmental impact analyses for the EIS.

The DEIS was distributed to agencies, tribes, groups, individuals and The Dalles library in April 2006. A public review period was open until June 19, 2006. BPA held a public meeting on May 24, 2006 in Wasco, Oregon to accept public comments on the DEIS. At the meeting comments were recorded. During the comment period, three individuals, and two agencies submitted comment letters or forms. In total 58 comments were identified from the public meeting notes and comment letters and forms. Issues raised in the comments included the following:

- Where power from the proposed wind projects would be used;
- The range of reasonable alternatives;
- Impacts of the wind projects and transmission lines to birds and bat species;
- Mitigation for and monitoring of impacts to bird and bat species;

- <u>Cumulative impacts of the proposed, existing and future wind projects on bird</u> <u>and bat species;</u>
- Visual impacts of the transmission line and wind turbines;
- Support for the wind projects;
- Support for the Proposed Action;
- Proposed decommissioning of the wind projects.

<u>Copies of comments made on the DEIS and BPA's responses to those comments</u> are in Chapter 10.

EFSC also request<u>ed</u> public comments during its site certification processes for the two proposed wind projects. <u>EFSC received no comments</u> related to BPA's actions for the proposed wind projects.

1.5 Organization of the EIS

The remainder of this EIS is organized as follows:

- Chapter 2 describes the proposed action and alternatives, including taking no action. It summarizes the differences among alternatives, especially in potential environmental impacts.
- Chapter 3 describes the existing environment that could be affected by the project. The existing environment includes the social and natural environment.
- Chapter 4 describes the possible environmental consequences of the proposed action and alternatives. An assessment of the direct, indirect, and cumulative effects on geology, soil, and seismicity, *hydrology* and water quality, vegetation and wildlife, fish, traffic and circulation, air quality, visual quality and aesthetics, cultural resources, land use plans and policies, socioeconomics, public services and utilities, and health and safety, including noise, is provided. Impacts can range from no or low impact to high impact.
- Chapter 5 discusses the licenses, permits and other approvals that must be obtained in order to implement the proposed action.
- Chapters 6 through 9 list the individuals who helped prepare the EIS, the references used, the individuals, agencies, and groups the EIS was sent to, and provides a glossary.
- Chapter 10 includes copies of comments made on the DEIS and BPA's responses to those comments.
- An index is included as Chapter <u>11</u>.
- Supporting technical information is in appendices.

Chapter 2 - Proposed Action and Alternatives

In this Chapter:

- BPA's Proposed Action
- Alternatives to the Proposed Action Including No Action
- Alternatives Considered But Eliminated from Detailed Study
- Descriptions of the Proposed Wind Projects
- Comparison of Alternatives and Summary of Impacts

This chapter describes two action alternatives and the No Action Alternative BPA is evaluating in detail in this EIS, and other alternatives considered but eliminated from detailed study. Summaries of the proposed Klondike III Wind Project and Biglow Canyon Wind Farm are also provided. The chapter concludes with comparative summaries of how each alternative addresses the purposes described in Chapter 1 of this EIS, as well as the potential environmental impacts of each alternative based on the analysis contained in Chapter 4 of this EIS.

2.1 BPA's Proposed Action

BPA's Proposed Action is to: (1) enter into interconnection agreements with PPM and <u>PGE</u> for their proposed wind projects; and (2) construct and operate a new **double***circuit* 230-kV transmission line and ancillary facilities from the proposed wind projects to BPA's John Day 500-kV Substation. These actions would allow the proposed wind projects to be interconnected with the FCRTS. The preferred route for the new BPA transmission line is the North Alternative (see Map 1). The 12-mile long line would generally extend north from PPM's Klondike Schoolhouse Substation for about 5.3 miles, and then west for the remaining 6.7 miles to the John Day Substation.

PPM's Klondike III project would be tied into the new line at Klondike Schoolhouse Substation. The Biglow Canyon Wind Farm would connect to the line at a new substation built by <u>PGE</u> located in between Klondike and the new John Day 230-kV Substation. The line would be constructed to carry up to 600 MW of capacity in each circuit to allow for additional capacity in the future.

To connect the new 230-kV transmission line to the FCRTS at the existing John Day 500-kV Substation, BPA would both expand the existing substation and construct a new 230-kV substation immediately adjacent to the existing substation. BPA would construct a new **bay** at the existing John Day 500-kV Substation and add two **circuit breakers** and associated disconnect **switches**. BPA would also extend the substation's existing south fence on existing BPA property to add a **dead end** tower to connect to the new 230-kV substation. The expanded area would be about 0.1 acre.

The new 230-kV substation would be directly south of the existing John Day 500-kV Substation. The new substation would occupy about 5 acres, and would include a 500/230-kV *transformer*, ring bus and other typical substation equipment. BPA would purchase 15 acres in fee for the proposed John Day 230-kV Substation.

The remainder of this section describes the proposed transmission line and ancillary facilities in more detail.

2.1.1 Proposed Double-Circuit 230-kV Transmission Line

BPA proposes to build a double-circuit 230-kV transmission line (see Map 1). Double circuit means carrying two transmission lines on one *structure*. For this project, a 230-kV line would be on each side of either a steel tube or a *lattice steel* tower. The preferred route for this line is the North Alternative, which is about 12 miles long.

2.1.2 Transmission Structures

Steel tubes and lattice steel towers would be used to suspend the 230-kV transmission line in the air (see Figure 1). Steel tubes would be used for *tangent* and small angle structures. Steel tubes average about 125 feet tall, with the average span 900 to 1,000 feet (see Figure 1). Steel tubes are usually preferred in agricultural areas because they do not disrupt farming practices as much as other types of structures.

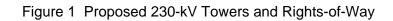
BPA would use lattice steel towers for the *dead-end* structures needed for the lines. Dead-end structures equalize tension of the *conductors* between two segments of transmission line where the line makes a turn. The last transmission structures on lines entering a substation are also dead-end towers. These towers are built with extra strength to reduce conductor tension on *substation dead-ends* and to provide added reliability to the substation.

Lattice steel towers would be used for dead-end towers because they are more cost effective than steel tubes. Lattice steel towers average about 120 feet tall, with the average span 1,000 to 1,200 feet (see Figure 1).

<u>Transmission structures are attached to the ground with footings. Preliminary</u> geological reports indicate that there may be basalt rock anywhere from 4 to 25 feet below ground level where new structures may be built. Three structure foundations could be used depending on the conditions at each tower site. Prior to construction, a subsurface report would be completed for each site to predict the type of footing needed.

<u>Steel Tubes</u> — If no rock is encountered, steel tubes would be direct embedded in the ground about 20 to 25 feet, in a hole about 5 feet in diameter. If rock is encountered, a 6-foot diameter concrete pier footing with steel reinforcement, with possible rock anchors, would be installed. The steel tube would be bolted to the top of the concrete footing.

<u>A track-mounted drill rig would be used to drill the holes. Select material would be used for backfill around the steel tube footing.</u>



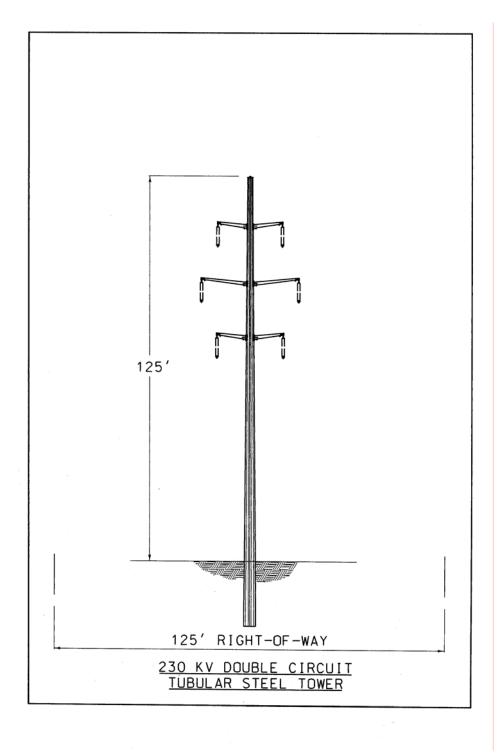
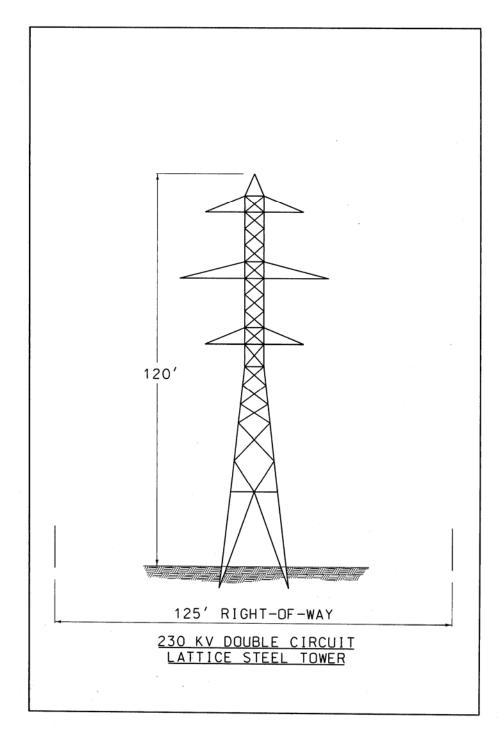


Figure 1, continued



Lattice Steel — Lattice steel towers would be attached to the ground at each of the four tower corners. Three types of footings would be used depending on the type of soil and tower type.

- Plate footings are 6 foot by 6 foot steel plates buried about 10 feet deep.
- Grillage footings are a 10 foot by 10 foot assembly of steel I-beams that are welded together and buried about 10 to 12 feet deep.
- Rock anchor footings are used when a tower is built on solid rock. Holes are drilled into the rock and steel anchors are secured within the hole with concrete. The tower footings are anchored to the rods.

A track hoe would be used to excavate an area for the footings. The excavation sidewalls would be sloped or shored to prevent collapse. All the soil and rock materials removed would be used to backfill the excavated area once the footings are installed.

Transmission structures would normally be assembled in sections at a structure site and lifted into place by a large crane (30 to 100 ton capacity). The construction of a tower and its footings could disturb an area of about an acre (200 feet by 200 feet) using plate and grillage footings.

2.1.3 Conductors and Insulators

The wires that carry electrical *current* in a transmission line are called *conductors*. The conductor proposed for this project would be about 1.3 to 1.6 inches in diameter. Conductors are suspended from tubes and towers with *insulators*. Insulators are made of nonconductive materials (rubber, porcelain or fiberglass) that prevent electric current from passing through the towers to the ground. Insulator strings of non-reflective material for BPA's line would be 10 inches in diameter and 7 feet long.

Conductors and insulators would be installed after the tubes and towers have been built. A pulling cable called a "sock line" would be placed in pulleys or travelers that are attached to the insulators on the structures. The sock line would be pulled through the pulleys, usually by helicopter. The end of the sock line would be attached to a conductor on large reels mounted on trucks equipped with a brake system that allows the conductor to be unwound under tension. The sock line would be used to pull the conductors through the series of pulleys mounted on the structures. Conductor tensioning sites would typically be located every 2 to 3 miles.

About 10 tensioning sites would be required for this project. Conductor tensioning sites would typically disturb an area of about 1 acre. Disturbance would be temporary. Any disturbed area would be restored to pre-construction conditions.

At the dead-end structures, there are two primary methods available to BPA to attach the conductor to the structure. The first method, hydraulic compression fittings, uses a large press and pump that closes a metal clamp or sleeve onto the conductor. This method requires heavy equipment and is time consuming. The second method, implosive fittings, uses explosives to compress the metal together. The implosive fittings do a better job of compressing the sleeve onto the conductor and actually weld the metals together. Implosive fittings do not require heavy equipment, but do create noise similar to a loud explosion when the primer is struck. BPA would use implosive fittings on this project.

<u>A</u> smaller wire, called <u>an optical</u> **ground wire**, would also be attached to the top of the transmission structures. Ground wires are used for lightning protection. There would also be a series of wires and/or grounding rods (called **counterpoise**) buried in the ground at each structure. These wires are used to establish a low resistance path to earth, usually for lightning protection.

<u>This optical ground wire</u> would <u>also</u> be used for communications as part of the power system. <u>The ground wire uses *fiber optic* technology, which</u> uses light pulses instead of radio or electrical signals to transmit messages. This communication system can gather information about the system (such as the transmission lines in service and the amount of power being carried, meter readings at interchange points, and status of equipment and alarms).

2.1.4 Right-of-Way

BPA would acquire **easements** to build, operate and maintain the transmission line across private properties. In general, the **voltage** of a transmission line is the primary factor in determining the necessary width of the **right-of-way** (ROW) required for the line for safety and other reasons. Because of the voltage of the proposed transmission line, a new 125-feet wide ROW would be required for the full 12-mile length of the line.

2.1.5 Right-of-Way Clearing

Most of the land along the ROW is in wheat production or has other low-growing vegetation compatible with transmission lines. Tall trees cannot be allowed to grow into or near the lines because electricity can arc, which can start a fire or injure or kill someone nearby. There are few tall trees along the proposed route and no trees would likely be removed.

2.1.6 Access Roads

BPA would use the existing road system as much as possible for construction. The proposed line currently parallels existing roads in the area, such as North Klondike Road and Herrin Road, for much of its length. However, some portions of the proposed line do not currently have road access, and access would be necessary for construction to each transmission structure site. BPA would purchase easements for **access roads**. Any roads needed in farmed fields would be about 14 feet wide, would be designed to be temporary and would be removed after construction, unless requested to be left in place by the landowner. If construction were scheduled during the dry season, little or no rock is anticipated to be necessary on the roads. Access roads would be used by cranes, excavators, supply trucks, boom trucks, and line trucks for construction of the transmission line.

Ground disturbed for temporary roads would be restored to its pre-construction condition after the transmission lines would be built. If crop damage were to occur during construction or maintenance, landowners would be compensated. The location of temporary roads would generally fall within the transmission line ROW. BPA would purchase the rights to a permanent access road system. Access road locations would be coordinated with landowners, to the extent practical, to minimize impacts on property.

2.1.7 Gates

Some landowners/land managers have policies regarding public access to their properties. Locked gates are commonly used to restrict public access. BPA cooperates with landowners on a case-by-case basis on permanent access, gates and locks. At this time, the exact location of any locked gates that could be required is unknown.

2.1.8 Staging Areas

During transmission line construction, steel, electrical conductors, insulators and hardware are often stockpiled at a site called a staging area or material yard that is near the proposed line. BPA would secure temporary rights to establish a material storage yard and contractor staging area. BPA's storage yard/staging area would be about 5 to 10 acres. The location of this staging area would depend on the needs of the project and would be determined prior to construction. To facilitate construction efficiency, staging areas tend to be located next to highways and main roads. Staging areas are only used prior to and during construction. After construction, the staging areas would be removed, and the disturbed areas would be restored to their pre-construction conditions.

2.1.9 Substation Facilities

Substations contain electrical equipment that enables BPA to interconnect several different transmission lines, disconnect lines for maintenance or outage conditions, and regulate voltage. BPA proposes to expand its existing John Day 500-kV Substation, and to build a new John Day 230-kV Substation. The existing 500-KV substation would be expanded by about 0.1 acre on existing BPA property. The new 230-kV substation would occupy about 5 acres. The principal equipment that would be installed at these substations under the Proposed Action is described below.

Transformer — A transformer is a device for transferring electrical energy from one circuit to another by magnetic induction, usually between circuits of different voltages. BPA would install a new 500/230-kV transformer at the new 230-kV substation.

Power circuit breakers — A breaker is a switching device that can automatically interrupt power flow on a transmission line at the time of a fault, such as a lightning strike, trees or tree limbs falling on a line or other unusual event. New breakers would be installed at both the existing 500-kV substation and new 230-kV substation to redirect power as desired.

Switches — These devices are used to mechanically or electrically disconnect or isolate equipment. Switches are normally located on both sides of circuit breakers. Switches are planned on each side of the proposed dead-end tower at the 500-kV substation and 230-kV substation.

Bus tubing, bus pedestals — Power moves within the substation and between breakers and other equipment on rigid aluminum pipes called bus tubing. This tubing is supported and vertically elevated by pedestals called "bus pedestals."

Substation dead-end towers — These are the towers within the confines of the substation where incoming and outgoing transmission lines end. Dead-ends are typically the tallest structures in a substation. A substation dead-end structure would be installed inside both substations. The 230-kV lines would terminate on these towers.

Substation fence — A chain-link fence with barbed wire on top typically is placed around all BPA substations to provide security. The fence is placed to allow adequate spacing between the fence and substation electrical equipment to maneuver construction and maintenance vehicles. The existing fence at John Day 500-kV Substation would be extended to include the new equipment. The new 230-kV substation would also be fenced.

Substation rock surfacing — A 3-inch layer of rock selected for its insulating properties would be placed on the ground within the new 230-kV substation to protect operation and maintenance personnel from electrical danger during substation electrical failures. The expanded area of John Day 500-kV Substation would also be rocked.

2.1.10 Communication Facilities

Microwave communication sites and fiber-optic communication lines connect BPA's high-voltage substations to system control centers located in Vancouver and Spokane, Washington. Dispatchers within the control centers remotely monitor meters and gauges on electric power equipment within each substation and receive alarm signals if an emergency were to occur. Dispatchers have the ability to disconnect lines and electrical equipment when transmission failures do occur through breakers and switches remotely.

Communications between the wind farm collector facilities and the proposed new 230-kV substation would be accomplished with fiber optic cables. Redundant fiber optic cables with alternate routes would be installed between the new substation and the existing 500-kV substation to ensure that no single failure would disable communications. The circuits would be connected to the existing BPA communication system.

2.1.11 Cost Estimate

The estimated construction cost for the transmission line, the new 230-kV substation and the expansion at the existing John Day 500-kV Substation is about \$40-45 million.

2.1.12 Maintenance

During the life of the project, BPA would perform routine, periodic maintenance and emergency repairs to the transmission line. Maintenance usually involves replacing insulators on an as-needed basis. Twice a year, a helicopter would fly over the line to look for hot spots (areas where electricity may not be flowing correctly) or other problems indicating that a repair may be needed.

Vegetation is also maintained along the line for safe operation and to allow access to the line. The area would need little vegetation maintenance because it is mostly farmed.

If vegetation maintenance is needed, BPA's vegetation management would be guided by its Transmission System Vegetation Management Program EIS (see Section 3.11.4 for more information). BPA uses an integrated vegetation management strategy for controlling vegetation along its transmission line rights-of-way. This strategy involves choosing the appropriate method for controlling the vegetation based on the type of vegetation and its density, the natural resources present at a particular site, landowner requests, regulations, and costs. BPA may use a number of different methods: manual (hand-pulling, chainsaws), mechanical (roller-choppers, brush-hogs), biological (insects or fungus for attacking noxious weeds), and herbicides.

Prior to controlling vegetation, BPA sends notices to landowners and requests information that might help in determining appropriate methods and *mitigation* measures (such as herbicide-free buffer zones around springs or wells). Noxious weed control is also part of BPA's vegetation maintenance program and BPA works with the county weed boards and landowners on area-wide plans for noxious weed control.

2.2 Middle Alternative

With the Middle Alternative, BPA would also: (1) enter into interconnection agreements with PPM and <u>PGE</u> for their proposed wind projects; and (2) construct and operate a new double-circuit 230-kV transmission line and ancillary facilities from the proposed wind projects to BPA's John Day 500-kV Substation. The transmission line for the Middle Alternative would originate from the same location as the Proposed Action, but would follow a different route to the new substation (see Map 1). This transmission line route would be about 12.5 miles long.

The Middle Alternative has all the components of the Proposed Action.

The estimated cost for the Middle Alternative is about \$40-45 million, about the same as the Proposed Action.

2.3 No Action Alternative

The No Action Alternative is often called the no-build alternative. Under this alternative, BPA would not sign interconnection agreements with PPM and <u>PGE</u>, and would not construct a new BPA substation, expand the existing John Day 500-kV

Substation, or construct a transmission line. The environmental impacts described for each of the BPA action alternatives would not occur. In addition, it is likely that both PPM's and <u>PGE</u>'s proposed wind projects would not be built since there appears to be no feasible interconnection option for these projects other than the FCRTS.

2.4 Alternatives Considered but Eliminated from Detailed Study

In developing this EIS, BPA considered a wide range of potential alternatives. This range included alternatives developed by BPA based on its knowledge of transmission line design and possible environmental issues, as well as alternatives that either were suggested or responded to concerns raised during the scoping process for this EIS. For each potential alternative, BPA assessed whether the alternative was reasonable under NEPA and merited detailed evaluation in this EIS, or was not reasonable and could be eliminated from detailed study.

BPA considered several factors in making this assessment of potential alternatives. BPA considered whether the potential alternative would meet the identified purposes and need for the proposed action (see Chapter 1). In addition, BPA considered whether the alternative would be practical and feasible from a technical and economic standpoint and using common sense, consistent with the Council of Environmental Quality Guidance on assessing the reasonableness of alternatives. Finally, BPA considered whether the alternative would have greater adverse environmental effects than the proposed action.

Alternatives deemed not to merit detailed evaluation in this EIS were those that did not meet the stated purpose and need for the proposed action, that were not practical or feasible, or that would have greater adverse environmental effects than the proposed action. This section summarizes the alternatives that were considered but have been eliminated from detailed study in this EIS.

2.4.1 Alternative Transmission Line Voltages

BPA considered other line voltages for a transmission line. A 115-kV line, (even if double-circuit), would not have the capacity for the amount of energy produced from the wind projects.

A 500-kV line would have more than enough capacity, but the cost would be prohibitive. A 500-kV line would also require larger towers and more ROW (150 feet) and would increase the impacts to visual resources and farming practices.

2.4.2 Underground Transmission Line Alternative

Underground transmission lines (cables), are highly complex in comparison to overhead lines. For 230-kV lines, underground cable may be <u>about 10</u> times as costly as overhead designs. Because of the cost, BPA uses underground cable in limited, special

reliability, or routing situations, such as near nuclear power stations, at locations where high capacity lines must cross long bays, or in urban areas.

2.4.3 Alternative Transmission Line Routes

BPA considered several possible alternate routes for BPA's transmission line (see Map 2). The following were eliminated based on comments received at the March 1, and April 27, 2005 public meetings and during the scoping period, or because they could create greater impacts than other alternatives.

2.4.3.1 Alternative A

In this alternative, the transmission line would go northwest from the Klondike Schoolhouse Substation; across a field to Klondike Road; north along Klondike Road; west along Medler Road; then northwest to the new 230-kV substation. This alternative was modified to place transmission lines on edges of fields, not across fields, per landowner comments. Landowners preferred that structures be placed on field edges. Parts of this alternative are now included in the Middle Alternative and this alternative was eliminated from further consideration.

2.4.3.2 Alternative B

In this alternative, the transmission line would run northwest from the Klondike Schoolhouse Substation; across a field to Klondike Road; north along Klondike Road, west along Medler Road; due west across China Hollow to the existing BPA ROW; then north, adjacent to the existing ROW to the new 230-kV substation. This alternative was eliminated from consideration because there is a quarry where blasting occurs along the route. Also, China Hollow has one of the better riparian areas in the area and so this alternative was eliminated to avoid disturbing it.

2.4.3.3 Alternative C

This alternative ran northwest from the Klondike Schoolhouse Substation to the west end of Medler Road, then northwest to John Day Substation. This alternative was eliminated from consideration in response to landowners' concerns about disrupting farming practices. Landowners preferred to have structures on the edge of fields instead of in the middle of fields.

2.4.3.4 Alternative D

In this alternative the transmission line ran northwest from the Klondike Schoolhouse Substation to the west end of Medler Road; due west across China Hollow to the existing BPA ROW; then north, adjacent to the existing ROW to the new 230-kV substation. This alternative was eliminated from consideration for the same reasons as Alternative B, because of the existing quarry and China Hollow. In addition, there were concerns about conflicting with farming practices.

2.4.3.5 Alternative E

In this alternative the transmission line ran west along Klondike Road from Klondike Schoolhouse Substation passing south of the city of Wasco to the existing BPA ROW; then north, adjacent to the existing ROW to the new 230-kV substation. This alternative was eliminated from consideration in response to comments. This route would come close to a new home and is also close to the town of Wasco. It also would create impacts to farming operations. Parts of this alternative became the South Alternative.

2.4.3.6 South Alternative

The original South Alternative was modified during the scoping period by moving the east to west portion of the route approximately one-half mile farther south to run along existing property lines and minimize farmland and residential impacts. This route ran due south from the Klondike Schoolhouse Substation; then due west and parallel to Klondike Road, intersecting with an existing BPA ROW; then north, adjacent to the existing ROW to the new 230-kV substation. This alternative was eliminated from further consideration because transmission structures would interfere with farming practices though the structures would be on section lines. It was also the longest alternative, which increases costs.

Originally, a new substation site along the South Alternative also was proposed during scoping. It was eliminated from consideration because it was associated with the South Alternative that has been eliminated from detailed study in this EIS.

2.5 **Proposed Wind Projects**

A reasonably foreseeable consequence of implementing either of BPA's action alternatives is the construction and operation of the wind projects respectively proposed by PPM and <u>PGE</u>. This section describes these two projects.

2.5.1 Klondike Wind Project

The Klondike III Wind Project, <u>which would be built by Klondike Wind Power III LLC</u> (KWP), a wholly-owned subsidiary of PPM Energy, Inc., would consist of a wind generation project in northern Sherman County, Oregon that would produce about 289 MW. The proposed project is adjacent to PPM Energy's Klondike I (24 MW) and Klondike II (75 MW) wind projects. It would be connected to <u>the proposed BPA 230-kV</u> transmission line (see Map 1).

All Klondike III facilities would be on private agricultural land. PPM has negotiated long-term wind energy leases with the landowners. The wind energy leases allow PPM to permit, construct, and operate wind energy facilities for a defined period. In exchange,

the landowners receive compensation. The terms of the wind energy leases allow landowners to continue their farming operations in and around the wind turbine generators and other facilities where the farming activities would not impact operation and maintenance of the wind generation equipment.

Klondike III facilities would consist of up to 165 wind turbines and towers, about 19 miles of new roads, <u>up to 2</u> operations and maintenance (O&M) <u>facilities</u>, and <u>one</u> substation. Wind turbines and roads would be built within corridors <u>approved by the</u> <u>Oregon Department of Energy</u>. <u>Turbine towers would be 263 feet tall (hub height) and</u> <u>range from 388 feet to 414 feet high, including blades</u>. Project facilities would occupy about <u>74</u> acres of land. Construction would temporarily disturb about <u>295</u> acres.

2.5.1.1 Turbines and Towers

Wind turbines consist of two primary components: a tubular tower, and the nacelle, which rests on the tower. The nacelle houses equipment such as the gearbox and supports the turbine blades and hub. The turbines are interconnected with an underground power collection system and linked to the project substation.

The wind turbines would be grouped in linear strings; some would include aviation warning lights required by the Federal Aviation Administration (FAA). The number of turbines with lights and the lighting pattern of the turbines would be determined in consultation with the FAA.

<u>Up to three</u> turbine types may be used for the project; <u>the largest turbine type would</u> <u>produce up to 2.4 MW (see Figure 2)</u>. The analysis in this <u>FEIS</u> is based on a "worst-case" situation, e.g., for the visual assessment, the talle<u>st</u> of the turbines was analyzed, and for the noise evaluation, the loude<u>st</u> was analyzed.

The blade diameter of the turbines would range from 253 to 305 feet. The height at the hub would be up to 263 feet. The swept area of the rotor would be from 50,138 to 73,195 square feet, and the rotor speed would be between <u>6</u> and 18 revolutions per minute (rpm).

The tower supporting each wind turbine would be a tapered monopole, roughly 26<u>3</u> feet tall. It would be supported by a spread footing concrete foundation. The underground footprint of each foundation would be about 2,000 square feet. The actual foundation design would be determined based on site-specific geotechnical information and structural loading requirements of the selected turbine model. The towers would be uniformly painted a neutral gray or white color. Each tower would have a locked entry door at ground level and an internal access ladder with safety platforms for access to the nacelle. A controller cabinet would be inside each tower at its base. Towers are typically fabricated in three sections that are assembled on-site, and they are designed to withstand the maximum wind speeds expected at the project – typically 134 miles per hour (mph) at hub height.

A generator step-up (GSU) transformer would be installed at the base of each wind turbine to increase the output voltage of the wind turbine to the voltage of the power

collection system (typically 34.5-kV). Small concrete slab foundations would support the GSU transformers.

2.5.1.2 Power Collection System

A network of underground power lines would <u>primarily</u> be installed within the prism of new and existing roads at the project to collect power generated by the individual wind turbines and route the power to a <u>switchyard</u> for delivery into the utility grid. The power collection system would operate at 34.5-kV. Where geotechnical conditions or other engineering considerations require, the collector system may be aboveground.

Power from the eastern section of the project would be routed to a <u>switchyard</u> near Webfoot (see Map 1). From that <u>switchyard</u>, <u>an</u> aboveground <u>double-circuit 34.5 kV</u> <u>collector</u> line would carry the power about 3.5 miles to <u>the new substation adjacent to the</u> Klondike Schoolhouse Substation. The poles would be about 110 feet tall, and sunk 30 feet deep. They would be spaced about 500 to 700 feet apart. <u>The 34.5-kV collector</u> <u>line would be on single-shaft wood poles</u>, or wood-equivalent tubular steel poles spaced <u>200-300 feet apart</u>. <u>Depending on terrain and ground clearance</u>, <u>single-circuit poles</u> <u>would be 40-55 feet above grade and double-circuit poles will be 50-65 feet above</u> <u>grade</u>. Pole strength and pole embedment depth would be designed according to wind <u>loading and the strength of soils</u>. <u>Embedment depth for this area is expected to be 8-</u> <u>12 feet</u>. Guys and anchors would support the poles at line angles and dead ends</u>. All poles would conform to raptor protection guidelines of the Avian Powerline Interaction Committee (1996).

2.5.1.3 Interconnection/Substations

A new substation would be constructed on about <u>5</u> acres <u>adjacent to the</u> existing Klondike Schoolhouse Substation to accommodate and step up the additional power entering the grid. The additional substation would include foundations, circuit breakers, power transformer(s), bus and insulators, disconnect switches, relaying, battery and charger, surge arrestors, control house, metering equipment, supervisory, control and data acquisition (SCADA) provision, grounding, fence, and associated control wiring. The substation facilities would conform to all applicable Oregon and BPA regulations and standards.

2.5.1.4 Operations and Maintenance Facility

An O&M building about 5,000 square feet would be built on the Klondike III site, on a <u>5</u>-acre parcel near Webfoot. A water supply (on-site well of less than 5,000 gallons per day) and sanitary facilities would be constructed at the new O&M site to serve Klondike III. Power to the new O&M building would be supplied by Wasco Electric Cooperative and would be carried from the existing O&M building, <u>about 2 miles</u> east. <u>A second O&M building may be built on a 5-acre parcel east of this site.</u>

2.5.1.5 SCADA System

A SCADA system to be installed at the project would collect operating and performance data from each wind turbine and the project as a whole, and provide remote operation of the wind turbines. The wind turbines would be linked to a central computer via a fiber optic network. The host computer is expected to be located in the O&M facility at the project site.

2.5.1.6 Meteorological Towers

Three permanent, un-guyed, meteorological towers to collect wind resource data would also be part of the facility.

2.5.1.7 Roads

About 19 miles of new roads would be constructed to access turbines. The roads would be 20 feet wide and constructed with crushed gravel. Existing roads near the project would be upgraded and widened, where necessary, to accommodate construction and O&M equipment. Temporary access roads may also be built during construction. They would be removed after construction.

2.5.1.8 Construction Laydown Areas

About 55 acres of temporary disturbance would occur in 19 laydown areas that would be used to stage construction and store supplies and equipment during construction. A 2-acre laydown area would be next to each proposed turbine string, and four 4-acre laydown areas would be located throughout the project site. The laydown areas would have a crushed gravel surface. After construction, the laydown areas would be removed, and the disturbed areas would be restored to their pre-construction conditions.

2.5.2 Biglow Canyon Wind Farm

The Biglow Canyon Wind Farm, proposed by <u>PGE</u>, would produce up to 400 MW in northern Sherman County. It would be connected to BPA's transmission system at one of two alternative substations on the Biglow Canyon Wind Farm site. <u>PGE</u> is responsible for selecting its substation alternative.

The project would be built on private land. <u>PGE</u> has negotiated long-term wind energy leases with the landowners in which the energy facilities would be constructed and operated in exchange for compensation.

The Biglow Canyon Wind Farm would consist of up to 225 wind turbines and towers, about 40<u>.5</u> miles of new roads, an O&M facility, and a substation. Wind turbines and roads would be built within 500-foot wide corridors. Project facilities would occupy <u>up to</u> about 17<u>7</u> acres of land.

2.5.2.1 Turbines and Towers

Generally, the turbines and towers for the Biglow Canyon Wind Farm would be similar to those described for Klondike III. As with Klondike III, the specific turbine type has not yet been selected. <u>The largest turbine type proposed for Biglow Canyon would produce up to 3 MW (see Figure 2)</u>. The blade diameter of the turbines would likely be up to <u>328</u> feet, and the tower height would be up to 279 feet. <u>Overall height of the wind turbines would be up to 443 feet</u>. The analysis in this <u>FEIS</u> is based on a "worst-case" scenario, as described for Klondike III.

2.5.2.2 Power Collection System

A transformer would be placed next to each turbine tower to increase the output voltage to 34.5-kV. Each transformer would be placed on a concrete slab. From the transformer, power would be transmitted via electric cables, some of which would be buried. In areas where collector cables from several turbine strings follow the same alignment (e.g., near the facility substation), multiple sets of cables could be installed within a single trench. There would be about <u>89</u> miles of underground electric cables.

In some areas, collector lines may be installed aboveground on poles or towers. Aboveground lines would allow the collector lines to span terrain such as canyons, native grasslands, *wetlands*, and *intermittent* streams, thereby reducing environmental impacts, or to span cultivated areas and reduce impacts to farming. Overhead structures would generally be between <u>37</u> and <u>60</u> feet tall.

2.5.2.3 Substation and Interconnection to BPA

The Biglow Canyon Wind Farm would be connected to BPA's transmission system at one of two alternative substations on the Biglow Canyon Wind Farm site. <u>PGE</u> is responsible for selecting its substation alternative (see Map 1). With either alternative, the proposed substation site would be a graveled, fenced area of up to 6 acres, with transformer and switching equipment and a parking area. Transformers would be non-PCB (polychlorinated biphenyl), oil-filled types.

2.5.2.4 Operations and Maintenance Facility

A permanent O&M facility would include about 5,000 square feet of enclosed space, including office and workshop areas, control room, kitchen, bathroom, shower, utility sink, and other facilities. Water would come from a well that would be constructed on the site. Water use is not expected to exceed 1,000 gallons per day. Domestic wastewater would drain to an on-site septic system. A graveled parking area for employees, visitors, and equipment would be built in the vicinity of the building. The O&M facility may be built next to the proposed substation.

2.5.3.5 SCADA System

A SCADA system, similar to that described for Klondike III, would be installed and linked to a central computer in the O&M building.

2.5.3.6 Meteorological Towers

Up to 10 meteorological towers would be placed throughout the Biglow Canyon project. The towers, which would be up to 279 feet tall, would collect wind resource data.

2.5.3.7 Roads

Existing roads in the analysis area are typically 16 to 20 feet wide. Some existing roads would be widened — up to 35 feet for construction, and up to 16 or 18 feet wide for operation, including an additional 5 to 6 feet of shoulders. Roads would be improved, where necessary, by adding an all-weather surface.

New access roads would be constructed where there are no roads near proposed turbine strings. About 40.5 miles of new access roads would be built. They would be about 28 feet wide for operation.

Temporary access roads may also be built during construction. They would be removed after construction.

2.5.2.8 Construction Laydown Areas

Up to six principal, temporary laydown areas for construction staging would be located on site. Each laydown area would be up to 5 acres and would be covered with gravel. After construction, the gravel would be removed and the area restored.

In addition to the principal laydown areas, temporary laydown areas would be located at each turbine location and at each turbine string. Each turbine laydown area would temporarily disturb about <u>18,500</u> square feet. Placement of blades in the laydown areas is expected to result in little or no soil disturbance.

In total, construction activities (e.g., laydown areas and collector system trenches) would disturb <u>up to 388</u> acres.

2.6 Comparison of Alternatives and Summary of Impacts

Table 2-1 provides a comparison of the two action alternatives and the No Action Alternative to the purposes identified in Chapter 1 of this EIS. Table 2-2 provides a summary of the potential environmental impacts and mitigation for each alternative. Detailed analysis of potential impacts is contained in Chapter 4, **Environmental Consequences** and appendices.

Table 2-1 Comparison of Alternatives to Project Purposes

Purposes	BPA Proposed Action	BPA Middle Alternative	No Action Alternative
Maintain transmission system reliability to industry standards	Best achieves this purpose due to shorter line and resulting lower energy losses than the Middle Alternative.	Achieves this purpose, but slightly less well as the Proposed Action due to its longer length and resulting higher energy losses.	Transmission system would remain at the existing levels of reliability.
Act consistently with BPA's statutory obligations	Meets this purpose.	Meets this purpose.	Meets this purpose, but not as well as either of the two action alternatives.
Continue to meet BPA's contractual obligations	Meets this purpose.	Meets this purpose.	May not meet this purpose.
Minimize environmental impacts	Creates slightly fewer environmental impacts than Middle Alternative due to shorter distance and fewer temporary and permanent impacts from road construction, tower placement, etc. Route avoids disrupting farming operations and visual impacts as much as possible. Most impacts would be temporary and located in heavily disturbed agricultural fields. BMPs and site restoration of temporary impacts would be used to minimize environmental impacts.	Creates slightly more environmental impacts than the Proposed Action due to longer distance and slightly more temporary and permanent impacts from road construction, tower placement, etc. Route creates more impacts to farming operations. Most impacts would be temporary and located in heavily disturbed agricultural fields. BMPs and site restoration of temporary impacts would be used to minimize environmental impacts.	Creates no new environmental impacts.
Minimize costs	The Proposed Action is slightly shorter than the Middle Alternative, would cost slightly less, and would best meet this purpose of the two action alternatives. Costs have been minimized by selecting the shortest alignment given site constraints, and minimizing angle structures as much as possible.	The Middle Alternative is slightly longer than Proposed Action and would cost slightly more. Costs have been minimized by selecting the shortest alignment given site constraints, and minimizing angle structures as much as possible.	No costs are associated with this alternative.
Encourage development of renewable energy resources	The Proposed Action would meet this purpose by interconnecting the two wind projects.	The Middle Alternative meets this purpose by interconnecting the two wind projects.	The No Action Alternative would not meet this purpose.

Table 2-2 Summary of Impacts from Alternatives

Resource	Existing Conditions	BPA Proposed Action	BPA Middle Alternative	Klondike III Wind Farm	Biglow Canyon Wind Project	No Action Alternative
Land Use (See Sections 3.1, Land Use and 4.1, Land Use)	All land crossed by the alternatives and the wind projects are privately owned. Almost all of the land is in agricultural production, with several small areas of CRP land. Land is zoned F-1 Exclusive Farm Use.	Low impacts. Permanent removal of about 17 acres of farmland. Impacts to farming would be minimized by using steel pole towers. Landowners would be compensated for temporary crop damage.	Low impacts. Permanent removal of about 17 acres of farmland. Impacts to farming would be minimized by using steel pole towers. Landowners would be compensated for temporary crop damage.	Low impacts. Permanent removal of about <u>62</u> acres of farmland. Impacts to farming would be minimized by using steel pole towers. Landowners would be compensated for temporary crop damage.	Low impacts. Permanent removal of about <u>173</u> acres of farmland. Impacts to farming would be minimized by using steel pole towers. Landowners would be compensated for temporary crop damage.	No new impacts are expected.
Transportation (See Sections 3.2, Transportation, and 4.2, Transportation Facilities)	Project is served by Interstate 84, Highway 97, Highway 206, local collector roads and private roads. Roads currently function at high levels of service. Bridges on potential haul routes are structurally sound (although some are functionally obsolete)	Low impacts. Temporary delays on some local collectors during construction. Some local collectors improved to allow construction traffic. No long- term level of service reduction or degradation of road surfaces. Temporary roads constructed in agricultural lands to access tower sites will be removed following construction.	Low impacts. Temporary delays on some local collectors during construction. Some local collectors improved to allow construction traffic. No long- term level of service reduction or degradation of road surfaces. Temporary roads constructed in agricultural lands to access tower sites will be removed following construction.	Low impacts. Temporary delays on some local collectors during construction. Some local collectors improved to allow construction traffic. No long- term level of service reduction or degradation of road surfaces. Some new permanent roads will be constructed in agricultural land to serve tower sites.	Low impacts. Temporary delays on some local collectors during construction. Some local collectors improved to allow construction traffic. No long- term level of service reduction or degradation of road surfaces. Some new permanent roads will be constructed in agricultural land to serve tower sites.	No new impacts are expected.
Recreation (See Sections 3.3, Recreation, and 4.3, Recreation)	Recreation is limited to upland game hunting and sightseeing of historic trails. The John Day River Corridor, Journey Through Time Scenic Byway, and Barlow Road Cutoff Trail are important recreation facilities outside the project area.	No impacts. No impact to recreational opportunities. Some visual impacts may occur (see Visual Resources Section).	No impacts. No impact to recreational opportunities. Some visual impacts may occur (see Visual Resources Section).	No impacts. No impact to recreational opportunities. Some visual impacts may occur (see Visual Resources Section).	No impacts. No impact to recreational opportunities. Some visual impacts may occur (see Visual Resources Section).	No new impacts are expected.

Resource	Existing Conditions	BPA Proposed Action	BPA Middle Alternative	Klondike III Wind Farm	Biglow Canyon Wind Project	No Action Alternative
Geology and Soils (See Sections 3.4, Geology and Soils, and 4.4, Geology and Soils)	Terrain is gently rolling with several small canyon crossings. Slopes are stable. Surface soils are Walla Walla silt loam, which is mostly being intensively farmed for dryland wheat.	Low impacts. Temporary road construction and disturbance to soils. No increase in long-term erosion potential. Permanent impacts (low impact) to about 17 acres of Type II soils.	Low impacts. Temporary road construction and disturbance to soils. No increase in long-term erosion potential. Permanent impacts (low impact) to about 17 acres of Type II soils.	Low impacts. Temporary road construction and disturbance to soils. No increase in long-term erosion potential. Permanent impacts (low impact) to about <u>62</u> acres of Type II soils.	Low impacts Temporary road construction and disturbance to soils. No increase in long-term erosion potential. Permanent impacts (low impact) to about <u>173</u> acres of Type II soils.	No new impacts are expected.
Water Resources (See Section 3.5, Water Resources and 4.5 Water Resources)	Area is in an arid mostly upland area, with no perennial streams. Several jurisdictional waters (intermittent streams) and small wetlands are present.	No impacts. No wetlands are present, and the three intermittent drainages will be spanned.	No impacts. No wetlands are present, and the three intermittent drainages will be spanned.	No impacts. Underground power line will <u>avoid</u> jurisdictional drainage and wetland.	Low impact. One jurisdictional intermittent drainage will be trenched for underground powerlines. About 100 cubic yards of fill/removal required.	No new impacts are expected.
Fish and Wildlife (See Section 3.6, Fish and Wildlife, and 4.6, Fish and Wildlife)	There is no fish habitat in the analysis area. Agricultural lands form most of the wildlife habitat. Some former agricultural lands have been enrolled in the CRP program and are mostly in grasses. Small areas of upland tree habitat exists in some of the larger draws or near structures. Shrub-steppe habitat exists in small patches on steeper slopes. Federal and state threatened and endangered species are not in the analysis area, but bald eagles and peregrine falcons may be present near the Columbia and John	No to Moderate impacts. No impacts to upland tree, shrub-steppe, grassland, or CRP habitat. No impact to Threatened or Endangered Species. Low to moderate impacts to various wildlife species, low impacts to some bird species from collision with transmission line structures.	No to Moderate impacts. No impacts to upland tree, shrub-steppe, grassland, or CRP habitat. No impact to Threatened or Endangered Species. Low to moderate impacts to various wildlife species, low impacts to some bird species from collision with transmission line structures.	No to Moderate impacts. No impacts to Threatened or Endangered Species. Moderate impacts to bird species, especially raptors and passerines and bat species. Low impacts to waterfowl, common terrestrial species.	No to Moderate impacts. No impacts to Threatened or Endangered Species. Moderate impacts to bird species, especially raptors and passerines and bat species. Low impacts to waterfowl, common terrestrial species.	No new impacts are expected.

Resource	Existing Conditions	BPA Proposed Action	BPA Middle Alternative	Klondike III Wind Farm	Biglow Canyon Wind Project	No Action Alternative
	Day rivers. Common wildlife species such as deer, elk, coyote and a variety of bird species are present. Hawks are common and nest nearby.					
Vegetation (See Sections 3.7, Vegetation, and 4.7, Vegetation)	Dryland wheat crops dominate vegetation in analysis area. Upland trees, shrub-steppe, and CRP lands are also present. No rare plant species are documented in the analysis area. Noxious weeds are common in areas not under cultivation.	Low impacts. About 17 acres of permanent impacts to agricultural lands (low impact). About 160 acres of temporary impacts to agricultural lands (low impact). <u>Mitigation</u> <u>measures</u> <u>would be</u> <u>implemented to</u> <u>control the</u> <u>spread of</u> <u>noxious</u> <u>weeds.</u>	Low impacts. About 17 acres of permanent impacts to agricultural lands (low impact). About 120 acres of temporary impacts to agricultural lands (low impact). <u>Mitigation</u> <u>measures</u> <u>would be</u> implemented to <u>control the</u> <u>spread of</u> <u>noxious</u> <u>weeds.</u>	Low impacts. Permanent Impacts <u>0.01</u> ac Grassland <u>0.0</u> ac Shrub Steppe <u>6.8</u> ac CRP <u>62</u> ac Agricultural (low impact) Temporary Impacts: <u>3.2</u> ac Grassland <u>2.0</u> ac Shrub Steppe <u>38.8</u> ac CRP <u>250</u> ac Agricultural (low impact) <u>Mitigation</u> <u>measures</u> <u>would be</u> <u>implemented to</u> <u>control the</u> <u>spread of</u> <u>noxious</u> weeds.	Low impacts. Permanent Impacts <u>0.88</u> ac Grassland 0. <u>52</u> ac Shrub Steppe <u>10.1</u> ac CRP <u>156.7</u> ac Agricultural (low impact) Temporary Impacts: <u>1.0</u> ac Grassland <u>1.5</u> ac Shrub Steppe <u>16.5</u> ac CRP <u>363.5</u> ac Agricultural (low impact) <u>Mitigation</u> <u>measures</u> <u>would be</u> <u>implemented to</u> <u>control the</u> <u>spread of</u> <u>noxious</u> weeds.	No new impacts are expected.
Visual Resources (See Sections 3.8, Visual Resources, and 4.7, Visual Resources)	Visual character of the area is open, rolling hills, with larger hills in the background and distant views of Cascade Mountains. Important visual resources nearby include Columbia River Gorge National Scenic Area, John Day River Canyon, five Oregon National Historic Trail sites,	No to Moderate impacts. No impacts to John Day River Canyon, all five Oregon National Historic Trail sites, Lower Deschutes River Canyon and Lower Klickitat River Canyon. Low impacts to	No to Moderate impacts. No impacts to John Day River Canyon, Oregon National Historic Trail sites, Lower Deschutes River Canyon and Lower Klickitat River Canyon. Low impacts to	No to High impacts. No impacts to four Oregon National Historic Trail sites, Lower Deschutes River Canyon and Lower Klickitat River Canyon. Low impacts to Columbia River Gorge Scenic Area.	No to High impacts. No impacts to all five Oregon National Historic Trail sites, Lower Klickitat River Canyon. Low impacts to Columbia River Gorge Scenic Area and Lower Deschutes River Canyon.	No new impacts are expected.

Resource	Existing Conditions	BPA Proposed Action	BPA Middle Alternative	Klondike III Wind Farm	Biglow Canyon Wind Project	No Action Alternative
	the Lower Deschutes River Canyon, the Lower Klickitat River Canyon, and the Journey Through Time Scenic Byway.	Columbia River Gorge Scenic Area, and Journey Through Time Scenic Byway. Moderate impacts in the immediate area.	Columbia River Gorge Scenic Area, and Journey Through Time Scenic Byway. Moderate impacts in the immediate area.	Low to Moderate impacts to John Day River Canyon, Journey Through Time Scenic Byway, and one Oregon National Historic Trail site. Moderate to High impacts in the immediate area.	Low to Moderate impacts to John Day River Canyon, Journey Through Time Scenic Byway. Moderate to High impacts in the immediate area.	
Socioeconomics (See Sections 3.9, Socioeconomics, and 4.9, Socioeconomics)	Sherman County has four incorporated communities: Grass Valley, Moro, Rufus and Wasco. County population is 1,900 residents and decreasing. Vacancy rates are relatively high, between 12 and 21 percent. 750 hotel rooms are available within 30 miles. Unemployment is several percentage points higher than the State of Oregon.	Positive impact. Positive impacts due to influx of construction workers.	Positive impact. Positive impacts due to influx of construction workers.	Positive impact. Positive impacts due to influx of construction workers and long-term facility employees.	Positive impact. Positive impacts due to influx of construction workers and long-term facility employees.	No new impacts are expected.
Cultural Resources (See Section 3.10, Cultural Resources, and 4.10, Cultural Resources)	Four archeological resources were identified near the transmission line corridors, two on each alternative. <u>Seven</u> archeological resources were found in the Klondike III area. One archeological resource and three historic resources were found in the Biglow Canyon area.	No impacts. Towers and temporary access roads will be placed to avoid the identified resources.	No impacts. Towers and temporary access roads will be placed to avoid the identified resources.	No impacts. Towers and temporary access roads will be placed to avoid the identified resources.	No impacts. Towers and temporary access roads will be placed to avoid the identified resources.	No new impacts are expected.
Noise, Public Health, and Safety (See Sections 3.11, Noise, Public Health and	Ambient noise levels are low, about 26 dBA. Existing noise is from intermittent traffic and	Low. Noise will be below EPA thresholds for nuisance.	Low. Noise will be below EPA thresholds for nuisance.	Low. Noise may exceed state standards. Noise	Low. Noise may exceed state standards. Noise	No new impacts are expected.

Resource	Existing Conditions	BPA Proposed Action	BPA Middle Alternative	Klondike III Wind Farm	Biglow Canyon Wind Project	No Action Alternative
Safety, and 4.11 Noise, Public Health and Safety)	substation and agricultural operations. There are no public health or safety issues identified in the analysis area.	EMF below statutory thresholds No impacts to local health and safety infrastructure.	EMF below statutory thresholds No impacts to local health and safety infrastructure.	easements will be purchased for turbine locations. Circuits would all be below ground; buried cables emit no electric fields. The maximum magnetic field values for the underground circuits would be 41.1 mG. No impacts to local health and safety infrastructure.	easements will be purchased for turbine locations. Some circuits would be below ground; buried cables emit no electric fields. The maximum electric field under the overhead 34.5- kV distribution line would be less than 1 kV/m. The maximum magnetic field values for the underground circuits would be 62.9 mG. The maximum magnetic field values for the overhead circuits would be 144.6 mG. No impacts to local health and safety infrastructure.	
Air Quality (See Sections 3.12, Air Quality, and 4.12, Air Quality)	Air quality is good within the analysis area. Periodic fugitive dust emissions from agricultural operations occur, but the area has not been designated a non- attainment area.	No to Low impacts. Short-term reduction in air quality during active construction periods from fugitive dust emissions. No long-term impacts.	No to Low impacts. Short-term reduction in air quality during active construction periods from fugitive dust emissions. No long-term impacts.	No to Low impacts. Short-term reduction in air quality during active construction periods from fugitive dust emissions. No long-term impacts.	No to Low impacts. Short-term reduction in air quality during active construction periods from fugitive dust emissions. No long-term impacts.	No new impacts are expected.

Chapter 3 - Affected Environment

In this Chapter:

- Existing environment
- Protected resources

This Chapter describes existing conditions within the analysis area and general vicinity, as well as within the analysis area for each resource described. Analysis areas vary in extent, depending on the resource being studied for potential project impacts. For example, visual impacts of the projects would affect a larger area (i.e., the area from which the project could be seen) than soil impacts, which would be limited to the areas of ground disturbance. The analysis areas are briefly described under each resource.

3.1 Land Use

The analysis area includes the proposed BPA transmission routes and substation areas; about 22,000 acres for the proposed Klondike III facilities; and about 25,000 acres for the proposed Biglow Canyon facilities.

Nearly all of Sherman County is zoned F-1 (Exclusive Farm Use), as is the analysis area, except for some isolated nodes of commercial, industrial, and residential zoning designations in and around the city of Wasco. The F-1 zone restricts most development to preserve land for agriculture or resource extraction. Individual single-family dwellings are permitted if they meet criteria for dwellings in exclusive farm use areas. The area is sparsely populated, with only a few single-family residences spread out throughout the analysis area.

Most of the analysis area is under dryland wheat or barley production, with some areas in open range for cattle. In 2002, Sherman County had about 129,000 acres in wheat and barley production (2002 Agricultural Census, Sherman County Profile). Portions of the county are also enrolled in the **Conservation Reserve Program** (CRP), a voluntary federal program to assist private landowners to convert highly erodible and environmentally-sensitive cropland to permanent vegetative cover. Based on an analysis of soil types performed by Sherman County, no ground in the county is considered high-value farmland (see Section 3.4, Geology and Soils).

Most farming activities occur between March and October (David Evans and Associates, Inc. [DEA], 2005). Typical farm practices for dryland wheat farming in the area are spring land preparation, such as plowing, aerial fertilizing, planting seed and weeding. In the fall, farmers harvest spring and winter wheat, burn stubble, spread straw or crop residue, and reduce tall stubble by disking or harrowing. Winter wheat is planted in the late summer/early fall.

Sherman County has a Natural Hazards (NH) combining district, but BPA's proposed facilities, and the wind projects' proposed facilities are outside the district boundaries.

3.2 Transportation

The transportation analysis area encompasses northern Sherman County, Oregon.

The Sherman County Transportation System Plan (TSP) (Sherman County, 2003c) identifies all public rights-of-way within the County. The existing road system inventory includes all highways, arterial roadways, and collector roads within Sherman County. Roads in unincorporated or rural areas of Sherman County fall under either county or state jurisdiction.

3.2.1 Highway System

Highways within Sherman County are identified in Table 3-1 and shown on Map 3. As shown in Table 3-1, US 97 functions as a major arterial through the county and serves statewide and regional traffic demands. OR 206 (minor arterial) and OR 216 (major collector) serve regional and local traffic demands. The primary difference between the classifications of major collector and minor arterial is daily traffic volume.

I-84 is the main east-west highway through north central Oregon and the analysis area. US 97 is the primary transportation facility in Sherman County and is used to transport local products.

OR 206 (Wasco-Heppner Highway) begins at US 97 just west of Wasco and runs northwest/southeast to Condon and into Morrow County. OR 206 is a highway of regional importance and serves as the primary farm-to-market route between Sherman County and Condon. OR 206 (Celilo-Wasco Highway) is a highway of district importance. Beginning at I-84 at Celilo Village in Wasco County, OR 206 parallels I-84 across the Deschutes River into Sherman County.

3.2.2 County Roads

Although the state highway system forms the backbone of the roadway system in Sherman County, county roads are a vital part of the circulation system. Table 3-2 identifies local roads near the proposed transmission line and wind power projects. County roads are also shown on Map 3.

State Route Number	Highway Name	ODOT Classification (ODOT Highway Number)	Sherman County Classification	Pavement Condition
I-84	Columbia River Highway	Interstate (2)	N/A	Good
US 97	Sherman Highway	Statewide (42)	Major Arterial	Fair
OR 206	Celilo-Wasco Highway	District (301)	Major Collector	Good/Fair
OR 206	Wasco-Heppner Highway	Regional (300)	Minor Arterial	Fair
OR 216	Sherars Bridge Highway	District (290)	Major Collector	Poor

Table 3-1 Highways in Sherman County

ODOT = Oregon Department of Transportation; Source: Sherman County TSP, 2003c

Table 3-2 Local Roads near the Proposed Project

Road Name	Functional Classification	Pavement Type	Pavement Condition	Number of Lanes
Hildebrand Lane	Major Collector	Paved	Good	2
North Klondike Road	Major Collector	Paved	Good	2
Scott Canyon Road	Major Collector	Paved	Good	2
Herrin Lane	Minor Collector	Paved	Good	2
Klondike Lane	Minor Collector	Paved	Fair	2
Sandon Road	Minor Collector	Gravel	Fair	2
Beacon Road	Local	Dirt	Not rated	1 (>12 feet)
Biglow Road	Local	Gravel	Fair	1 (>12 feet)
China Hollow Road	Local	Paved/Gravel	Good	varies 1 to 2 lanes
Dehler Road	Local	Gravel	Poor	1 (>12 feet)
Egypt Road	Local	Dirt	Not rated	1
Emigrant Springs Lane	Local	Paved	Good	2
Gerking Road	Local	Gravel	Poor	1
Gosson Lane	Local	Gravel	Very poor	1
Greenberry Road	Local	Gravel	Fair	1
Helms Lane	Local	Paved	Good	2
Klondike Road	Local	Gravel	Fair	1
Macnab Lane	Local	Dirt	Not rated	1
Medler Lane	Local	Paved	Good	2
Oehman Road	Local	Gravel	Good	1
Tom Lane	Local	Paved	Good	2

Source: Sherman County TSP, 2003c

Near the proposed project, Sherman County maintains several collectors and local roads. All major collectors (Hildebrand Lane, North Klondike Road and Scott Canyon

Road) are two-lane paved roads in good condition. Minor collectors (Herrin Lane, Klondike Lane, and Sandon Road) are also paved two-lane facilities with the exception of Sandon Road, which is a two-lane gravel road. Both major and minor collectors are in fair to good condition and would be the primary access roads for the proposed projects.

Local roads that could be used for construction, operation and maintenance of the proposed projects vary in width and condition. Paved county roads with two lanes are generally 24 feet wide but can be as narrow as 16 feet with no shoulder. Medler Lane, located next to the BPA action alternatives and likely a primary access route, is a paved two-lane road in good condition. Gravel roads are generally 20 feet wide with no shoulders. There are several roads where the ROW is wider than 12 feet, but not wide enough to accommodate two lanes of traffic. Local roads are a mixture of paved, gravel, or dirt facilities; some roads alternate between gravel and paved surfaces. Most local roads near the projects are in fair to good condition, but Dehler and Gerking Roads, which would likely be used to access the proposed wind power projects during construction, and operation and maintenance, are rated in poor condition; Gosson Lane, near the proposed Klondike III facility, is in very poor condition. All three are gravel roads.

Sherman County primarily addresses roadway maintenance on an as-needed basis. It develops prioritized project lists each year through roadway inspection by maintenance crews and with the help of citizens who inform the County about maintenance needs, especially in rural areas not routinely traveled by maintenance personnel. Sherman County's maintenance department is responsible for all aspects of road maintenance including pavement rehabilitation, roadway signing and lighting needs, ditch and culvert clearing, and pavement marking.

The County does not normally pave new roads, mainly due to budget constraints. Generally, maintaining paved roads requires filling potholes and asphalt overlays. Gravel roads in Sherman County receive the most routine maintenance. Most gravel roads are bladed twice annually: once in the spring and once in the fall. All dirt roads are generally only graded to a minimal width to provide access to adjacent properties. The County approaches maintenance of dirt roads without a formal routine or preventive maintenance plan. The County also provides road maintenance services to the cities of Rufus, Wasco, Moro and Grass Valley. The County maintains some city streets and provides some snow removal service during the winter months for the roads that are heavily traveled, such as bus routes, or are needed for emergency service access.

3.2.3 Bridges

The Oregon Department of Transportation (ODOT) has jurisdiction over and maintains 77 bridges on state highways in both rural and urban Sherman County. There are 16 bridges located on I-84, 28 bridges on US 97, 16 bridges on OR 206 (Wasco-Heppner Highway), 15 bridges on OR 206 (Celilo-Wasco Highway) and spur, and three bridges on OR 216. Four state-owned bridges are functionally obsolete: two of the bridges are on I-84 east of Rufus; another is on US 97 as it crosses over I-84; and the fourth is located on OR 206 (Celilo-Wasco Highway) in Fulton Canyon. The bridges on I-

84 and US 97 would be on primary haul routes for the proposed projects. The bridge on US 206 is west of the analysis area and is not anticipated to be a primary haul route because truck traffic would use US 97 as a more direct connection to the proposed projects. While the three bridges on I-84 and US 97 are functionally obsolete, none are structurally deficient or have weight restrictions that would limit trucks and heavy equipment (ODOT, 2005).

Sherman County owns and maintains 10 bridges, one of which is identified as structurally deficient. The deficient bridge spans Mud Hollow Canyon and is on Mud Hollow Road west of US 97, is outside the analysis area, and would not be used for any of the projects.

3.2.4 Roadway Operations

Roadway operations are measured in level of service (LOS), where LOS is a function of both average travel speed and percent of time following the vehicle ahead. Six standards are used to identify LOS, from LOS A in which traffic is relatively free flowing, to LOS F, in which the system is saturated with traffic and movement is substantially slowed.

Traffic conditions along I-84 in Sherman County for average and peak summer traffic conditions was LOS A, where traffic is free flowing even at the height of summer conditions (Sherman County, 2003c). All other highways in the county also operate at LOS A (Sherman County, 2003c).

Even under projected worst case conditions in 2019 (TSP planning horizon), freeway, two-lane rural highway, and unsignalized intersection operations in Sherman County are expected to continue to operate at LOS A or B (Sherman County, 2003c). There are no identified capacity constraints within the county.

3.3 Recreation

The BPA Proposed Action and Middle Alternative lie entirely within the analysis area for the proposed wind projects.

All recreational facilities within 5 miles of the proposed Klondike III Wind Project and Biglow Canyon Wind Farm were identified as part of their respective *Applications for Site Certificates* (ASCs) (DEA, 2005; CH2MHill, 2005). Using the two ASC inventories, recreational uses and areas were identified from about 4 miles north of the Columbia River in Klickitat County to areas south of the community of Moro, and recreational facilities from the west of US 97 to east of the John Day River. Recreation facilities are shown on Map 4.

3.3.1 Recreation Facilities

In general, recreational activities in the county include camping, hiking, upland bird and big game hunting, rafting, boating, fishing, sightseeing (including observational astronomy), nature and wildlife photography, and bicycling. Water-based recreation activities occur on the nearby John Day River. Recreational opportunities in the area are generally limited to "access by permission only" e.g., upland bird/big game hunting and observational astronomy and some viewing of historic trail alignments from county roads.

No important recreational facilities or opportunities exist along the proposed transmission line routes, substation sites, or within the two proposed wind projects' site boundaries except those mentioned above (DEA, 2005, CH2MHill, 2005).

Three important recreational facilities are within the vicinity of the proposed projects, but are outside the immediate project boundaries: the John Day River Corridor, the Journey Through Time Scenic Byway, and the Historic Oregon Trail and Barlow Road Cutoff Trail alignments.

3.3.2 John Day River

The John Day River system includes more than 500 river miles and is one of the longest free-flowing river systems in the continental United States. The main stem of the river between about river miles 0 and 26 runs through the proposed wind power facility analysis areas (for Biglow Canyon from river mile 0 to 20, for Klondike III from river mile 5 to 26). This segment is a designated Federal Wild and Scenic River and is classified as *Recreational*, meaning that at the time of designation, the segment was readily accessible by road or railroad, may have some shoreline development, and may have undergone some impoundment or diversion in the past. Outstanding remarkable values include the following: scenic, recreation, fish, wildlife, geological, paleontological, and archaeological. Botanical and ecological values are also deemed important (DEA, 2005; CH2MHill, 2005).

The segment is also designated as a State Scenic Waterway. The Scenic Waterway designation included the river itself and the lands that lie within 0.25 mile of its high water line. Scenic River Areas are administered to preserve their undeveloped character, maintain or enhance their high scenic quality, recreation, fish, and wildlife values, while allowing continued agricultural use. The guideline for new utility facilities in Scenic River Areas is that they share existing utility corridors, minimize ground and vegetation disturbance, and make use of non-visible alternatives when reasonably possible (DEA, 2005; CH2MHill, 2005).

The State of Oregon also established the John Day Wildlife Refuge in 1933, which includes the river segment in the analysis area. The primary purpose of the refuge is to protect wintering and nesting waterfowl (DEA, 2005; CH2MHill, 2005).

The primary recreational uses along this section of the John Day River include boating, rafting, and fishing. Secondary uses may include upland bird hunting, sightseeing, and nature/wildlife photography (DEA, 2005; CH2MHill, 2005). The US Department of the Interior, Bureau of Land Management (BLM) has developed the Oregon Trail Interpretive Site near the John Day River Crossing (a.k.a. McDonald Ferry) and the Rock Creek facility, both day use areas that provide boating access to the John Day River. The interpretive site near McDonald Ferry also provides historical information about the Oregon Trail. Wheel ruts and scars are visible on the hillside from the interpretive site. There are no developed or undeveloped camping sites along this section of the river.

3.3.3 Journey Through Time Scenic Byway

The Journey Through Time Scenic Byway runs south from Biggs along US 97 through the analysis area to Shaniko, where it turns east, and eventually travels to Baker City. "Off the Beaten Path: A Guide to Oregon's Scenic Byways," published online by the Oregon Tourism Commission, characterizes this byway as celebrating 50 million years of Oregon history by providing a route through an area with abundant fossils, pioneer trails, ghost towns, and other remnants of the old West (Oregon Tourism Commission, 2006). The guide mentions these features along the segment of the scenic byway in the analysis area: Biggs, which is characterized as a traditional Native American salmon harvesting site; Wasco, with its original Columbia Southern Railroad depot; and Moro, home of the Sherman County Historical Museum.

Primary recreational uses include sightseeing and road touring. There are no developed scenic overlooks or waysides along the byway in the analysis area. Bicyclists tend to avoid US 97 due to the relatively heavy traffic volumes (DEA, 2005) including commercial traffic.

3.3.4 Historic Oregon Trail and Barlow Road Cutoff Trail Alignments

Although the historic Oregon Trail and Barlow Road Cutoff trail alignments technically meet the criteria of being important recreational opportunities, agricultural practices and other development activities have destroyed nearly all evidence of the trails in the analysis area. The only accessible, intact segment that has been identified near the proposed projects occurs near McDonald Ferry on the John Day River. The Oregon Trail is also described in Section 3.10, Cultural Resources.

Historic trail crossings at county and state roads are signed to some degree, but many signs are dilapidated or missing. Further, the surrounding landscape is primarily private land cultivated for wheat, so the recreational opportunity is limited to visiting and viewing the approximate historic alignments from county roads.

3.3.5 Federal and Local Management Plans for Recreational Resources

Section 3.8, Visual Resources, describes the applicable management plans for recreation, which focus on scenic and aesthetic values within the analysis area that may apply.

3.4 Geology and Soils

The analysis area for geology is northern Sherman County; the analysis area for soils encompasses the areas in which ground disturbance may occur for the BPA action alternatives, the Klondike III Wind Project, and the Biglow Canyon Wind Farm.

Geology and soils characteristics for those portions of the proposed transmission line routes outside the wind farm analysis areas are similar to those within them (DEA 2005; GRI 2005; and CH2MHill 2005).

3.4.1 Topography

Topography within the area is typified by gently rolling to level ground located along a high plateau south of the Columbia River. Areas of steep slopes are confined to portions of the Deschutes River Canyon to the west and John Day River Canyon to the east, including several unnamed intermittent tributaries. Elevations range from 185 feet above sea level along the Columbia River to 3,600 feet on the highlands in southern Sherman County (CH2MHill, 2005). Elevations along the plateau, within the analysis area, range from about 950 to 1,500 feet.

The proposed transmission line would begin in the western portion of the analysis area, at about elevation 1,500 feet near the existing Klondike Schoolhouse Substation. The line would extend northwesterly toward the existing John Day Substation at about elevation 950 feet. With both action alternatives, the line would traverse a series of low, east-west-trending ridges, where slopes are typically in the range of 3 to 8 percent (GRI, 2005). The proposed Klondike III turbines would be on a relatively flat topographic plateau between 1,250 to 1,500 feet in elevation. Slopes in the turbine locations are typically less than 3 percent. Tower locations would not encroach on steeper areas to the south along Grass Valley Canyon. Topographic conditions are similar in the area of the proposed Biglow Canyon Wind Farm (CH2MHill, 2005).

3.4.2 Geology

The analysis area is in the Deschutes-Columbia Plateau *physiographic* province, a north-sloping, volcanic plateau that covers over 60,000 square miles in Oregon, Washington, and Idaho. Volcanic rocks mapped as Columbia River Basalt Group underlie nearly the entire province. Most of the area is mantled by brown, fine-grained, silty soils, referred to as loess. The thickness of loess observed in road cuts is typically 4 to 6 feet.

No landslide deposits are mapped within the project boundary (Bela, 1982; scale 1:250,000). The transmission line route alternatives would not cross areas mapped with the potential for slope stability, flooding, or erosion-related geologic hazards (GRI, 2005). No obvious surface evidence of large-scale, deep-seated slope instability, or evidence of faulting or ground rupture, along the eastern two-thirds of the alignment or the area around the line terminus was observed (GRI 2005). Review of aerial photography did not reveal evidence of slope instability, faulting, or ground rupture in the project vicinity.

The Klondike III project area is underlain by a surface layer of silt (loess) 4 to 6 feet thick, overlying basalt (GRI 2005). Review of aerial photography did not reveal evidence of slope instability, faulting, or ground rupture (GRI, 2005).

The Biglow Canyon project area is also underlain by a surface layer of silt (loess) overlying basalt. No obvious surface evidence of large-scale, deep-seated slope instability, or evidence of faulting or ground rupture was observed; and aerial photography did not reveal evidence of slope instability, faulting, or ground rupture (CH2MHill, 2005).

3.4.3 Geologic Structure

The analysis area lies between the Deschutes and John Day rivers, between the Columbia Hills Anticline to the north (Newcomb, 1966) and the Gordon Ridge Anticline and Grass Valley Syncline to the south (Bela, 1982). The analysis area lies about 180 miles inland from the surface expression of the Cascadia Subduction Zone. The subduction zone is a broad, eastward-dipping zone of contact between the upper portion of the subducting slabs of the Gorda and Juan de Fuca plates, and the over-riding North America Plate (GRI, 2005).

3.4.4 Soils

The near surface soils in the project vicinity were identified using the US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Soil Survey of Sherman County, Oregon (Macdonald et al., 1999). The soils in the area are grouped into five General Soil Units – Wato-Anders, Walla Walla-Anderly, Wrentham-Lickskillet-Rock Outcrop, Lickskillet-Nansene, and Mikkalo-Ritzville. Each general soil unit is composed of several soil series units, which are delineated at a greater level of detail, but share relatively similar spatial coverage and engineering properties as the general units. Table 3-3 provides a listing of these detailed soil units, including their drainage class and erosion potential. Soils in the area are shown on Map 5.

Area soils are susceptible to accelerated erosion caused by disturbance of natural conditions through burning, excessive grazing, or tillage (NRCS, 1964). These disturbances increase the potential for erosion by wind and water. Wind typically presents the greatest source of erosion due to the arid climate. Water erosion is typically less serious because much of the precipitation comes in the form of gentle rain. However, localized rain of high intensity, prolong duration, rain on frozen ground, and rapid snowmelt events can cause considerable runoff, and soil losses on unprotected soils are then high (NRCS, 1964).

The analysis area is dominated by Walla Walla silt loam. The NRCS Soil Survey of Sherman County (1999) identifies Walla Walla silt loam, deep and very deep, as being well suited for wheat and moderately well suited for barley. The State of Oregon and NRCS have identified seven soil map units as farmland of statewide importance and seven soil map units as prime farmland only if irrigated, although none of these soil units are currently irrigated in the analysis area. Only one small section of land next to the John Day Substation is irrigated and its soil type is within the Kuhl soil complex, which is not considered prime farmland if irrigated. Based on additional analysis of soil types performed by Sherman County, the analysis area does not contain high-value farmland (Macnab, 2005).

		Erosion	Farmland
Soil Series	Drainage Class	Potential	Classification
Anderly silt loam, 1 to 7 percent slopes	Well drained	High	Prime, if irrigated
Anderly silt loam, 7 to 15 percent slopes	Well drained	High	Statewide
		-	importance
Anderly silt loam, 15 to 35 percent south slopes	Well drained	High	Statewide
			importance
Endersby fine sandy loam, 0 to 3 percent slopes	Somewhat	Not high	Prime, if irrigated
	excessively		
	drained		
Endersby-Hermiston complex, 0 to 3 percent slopes	Well drained	Not high	Prime, if irrigated
Kuhl very stony very fine sandy loam, 3 to 20 percent	Well drained	High	
slopes		NI (1) (1)	
Lickskillet-Rock outcrop complex, 40 to 70 percent south slopes	Well drained	Not high	
Lickskillet very stony loam, 7 to 40 percent south slopes	Well drained	Not high	
Lickskillet-Bakeoven complex, 2 to 20 percent slopes	Well drained	Not high	
Mikkalo silt loam, 2 to 7 percent slopes	Well drained	High	Prime, if irrigated
Mikkalo silt loam, 7 to 15 percent slopes	Well drained	High	Statewide
		-	importance
Nansene-Rock outcrop complex, 35 to 70 percent north slopes	Well drained	Not high	
Ritzville silt loam, 2 to 7 percent slopes	Well drained	Not high	Prime, if irrigated
Ritzville silt loam, 7 to 15 percent slopes	Well drained	Not high	Statewide
			importance
Rock outcrop-Rubble land-Lickskillet complex, 50 to 80	Well drained	Not high	
percent south slopes			
Walla Walla silt loam, 1 to 7 percent slopes	Well drained	Not high	Prime, if irrigated
Walla Walla silt loam, 7 to 15 percent slopes	Well drained	Not high	Statewide
		-	importance
Walla Walla silt loam, 15 to 35 percent north slopes	Well drained	Not high	Statewide
			importance
Wato very fine sandy loam, 3 to 7 percent slopes	Well drained	Not high	Prime, if irrigated
Wato very fine sandy loam, 7 to 15 percent slopes	Well drained	Not high	Statewide
			importance

Table 3-3 Detailed Soil Map Units Present in Analysis Area

3.4.5 Regional Seismological Setting

Potential seismic sources that may affect the projects can be grouped into three independent categories: *subduction zone events*, *subcrustal events*, and *local crustal events*. Subduction zone events and subcrustal events have not occurred in the Pacific Northwest in post-settlement times, and are generally widely spaced in geologic time, they may occur during the life of the projects. Sudden crustal movements along relatively shallow, local faults in the Columbia-Deschutes Plateau area are rare, but have been responsible for local earthquakes.

3.5 Water Resources

The analysis area includes the proposed BPA transmission routes and substation areas; about 22,000 acres for the proposed Klondike III facilities; and about 25,000 acres for the proposed Biglow Canyon facilities.

3.5.1 Precipitation

Located on the eastern side of the Cascade Mountains, the area predominantly exhibits the continental climate of the Intermountain Region – extreme temperatures and low rainfall. However, the Columbia River Gorge provides a passageway for the normal eastward migration of ocean-conditioned air masses from the Pacific. Most of the annual rainfall in Sherman County occurs between November and February, reflecting the strong influence of the marine air masses entering from the Pacific Ocean. Mean monthly rainfall (measured 1971 to 2000 at Moro, Oregon) ranges from 0.31 inch in July to 1.57 inches in January. Between 1910 and 1995, average total annual precipitation was 11.76 inches in Wasco, Oregon (Oregon Climate Service, 2005).

3.5.2 Floodplains

There are no *floodplains* mapped by the Federal Emergency Management Agency (FEMA) within the analysis areas (FEMA, 1984).

3.5.3 Groundwater

The analysis area lies within the Columbia Plateau regional aquifer system. Groundwater resides in the cracks, fractures, and loose materials associated with the upper and lower boundaries of the numerous basalt (i.e., lava) flows associated with the basin. Groundwater can also be found in layers of unconsolidated-deposits that overlie the basalt flows (US Geological Survey [USGS], 2006).

In Sherman County, the basaltic rock aquifers tend to be the most productive; however, both basaltic rock and unconsolidated-deposits are present. Typical well depths range from 125 to 710 feet below ground surface and have yields ranging from less than 20 up to 2,000 gallons per minute. The principal ground water uses in the county are for public supply, domestic and commercial, agriculture, and industrial (USGS, 2006).

The analysis area is not in a State of Oregon Groundwater Management Area (Oregon Department of Environmental Quality [DEQ], 2005a).

3.5.4 Wetlands and Surface Water

Project wetland specialists conducted a site visit and wetland delineation on November 18, 2005, for the Klondike III/ Biglow Canyon Wind Integration Project. They

also reviewed recent documents from the Biglow Canyon Wind Farm ASC (CH2M HILL, 2005) and the Klondike III Wind Project ASC (DEA 2005) and field-verified the findings of these documents.

Wetland specialists used the U.S. Army Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987) to complete the wetland delineation. This manual requires that all three wetland parameters –hydrology, hydrophytic (water-loving) plants, and hydric soils – be present for an area to be considered a wetland.

Wetland specialists reviewed reference materials prior to the field investigation to provide information regarding the possible presence of wetlands, water features, hydric soils, wetland hydrology, and site topography. The materials reviewed included precipitation data for Pendleton, Oregon (Oregon Climate Service, 2005); US Geological Survey (USGS) 7.5-minute Quadrangle maps; National Wetlands Inventory (NWI) maps; and the on-line Soil Survey of Sherman County Area, Oregon (USDA, 2005).

Most of the analysis area is in dry land wheat production. Few areas of native plant communities remain, occurring only in small patches along stream channels. (See Section 3.7, Vegetation, for further discussion on plant communities.)

Soils are relatively homogeneous throughout the wetland analysis area. The typical soil profile consisted of dark brown silt loam from 0 to 16 inches deep, with no mottles or other indicators of hydric soils present. This profile was observed throughout most of the wetland analysis area and was determined to be non-hydric (DEA, 2005; CH2MHill, 2005).

Within the entire analysis area, two jurisdictional wetlands and six jurisdictional drainage crossings were identified (see Map 6 and Table 3-4). A jurisdictional wetland or drainage is one that is considered a water of the state and regulated by the Oregon Department of State Lands and/or the Army Corps of Engineers. Many other non-jurisdictional drainages were identified in the analysis area, however these drainages are not regulated and most have been affected by agricultural practices such as plowing and no channels exist. They are not considered further in the analysis.

Water Resource	Description*	Project Area
Wetland W1	POWHX in non-jurisdictional drainage in Emigrant Canyon	Biglow Canyon
Wetland W2	PEMIC in non-jurisdictional drainage	Klondike III
Drainage A	Jurisdictional drainage in Gerking Canyon	BPA Proposed Action
Drainage B	Jurisdictional drainage in Scott Canyon	BPA Proposed Action
Drainage C	Jurisdictional drainage in tributary to Helm Canyon	BPA Proposed Action
Drainage D	Jurisdictional drainage in Gerking Canyon (south of A)	Middle Alternative
Drainage E	Jurisdictional drainage in Gerking Canyon (south of A, D)	Middle Alternative
Drainage F	Jurisdictional drainage in tributary to China Hollow	Middle Alternative

Table 3-4 Wetlands and Jurisdictional Drainages

* POWHX = Palustrine open water permanently flooded excavated wetland; PEM1C = Palustrine emergent persistent seasonal wetland.

3.5.4.1 BPA Proposed Action

BPA's Proposed Action crosses three drainages and no wetlands (see Map 6):

- Crossing A: A jurisdictional drainage was identified in Gerking Canyon about

 mile west of the existing John Day Substation. This drainage runs north and is
 an unnamed intermittent tributary of the Columbia River. No water was
 observed, but a channel with bed and bank characteristics about 8 feet wide and
 5 feet deep was present. Upland herbaceous *species* dominated the channel
 banks during the site visit.
- Crossing B: A jurisdictional drainage was identified just west of Scott Canyon Road and south of Herrin Lane. This drainage runs northwest and is an unnamed intermittent tributary of the Columbia River. No water was observed, but a channel with bed and bank characteristics about 5 feet wide and 3 feet deep was present. Upland herbaceous species dominated the channel during a site visit.
- Crossing C: A jurisdictional drainage was identified west of Helm Canyon, along Herrin Lane. This drainage runs north and is an unnamed intermittent tributary of Helm Canyon, which is an intermittent tributary of the Columbia River. No water was observed, but a channel with bed and bank characteristics about 2 feet wide and 2 feet deep was present. Upland herbaceous species dominated the channel during the site visit.

3.5.4.2 Middle Alternative

The Middle Alternative crosses three drainages and no wetlands:

- Crossing D: A jurisdictional drainage was identified about 3 miles southeast of the existing John Day Substation, just west of Scott Canyon Road. This drainage runs northwest and is the upstream portion of the drainage in Gerking Canyon described under Crossing A, above. No water was seen, but a channel with bed and bank characteristics about 5 feet wide and 3 feet deep was present. Upland herbaceous species dominated the channel during a site visit.
- Crossing E: The same unnamed jurisdictional drainage identified as Crossing D is re-crossed less than 1 mile upstream and retains the same character as Crossing D.
- Crossing F: A jurisdictional drainage exists along Medler Road, east of Scott Canyon Road. This drainage runs northwest and through a culvert under Medler Lane. The drainage is an unnamed intermittent tributary of China Hollow, which is an intermittent tributary of the Columbia River. No water was observed, but a channel with bed and bank characteristics about 5 feet wide and 2 feet deep was present. Upland herbaceous species dominated the channel during the site visit.

3.5.4.3 Wind Projects

According to the wetland delineation results from the Biglow Canyon Wind Farm ASC (Western EcoSystems Technology, Inc. [WEST], 2005), one wetland (W1) exists within the project boundary. The small wetland (0.06 acres) is identified as a palustrine open water permanently flooded excavated wetland (POWHX) and is in the eastern section of the analysis area, just north of Emigrant Springs Lane and between Weir Road and Rayburn Road (see Map 6). The wetland is associated with a nonjurisdictional drainage at the top of Emigrant Canyon and was likely formed when the small drainage was dammed near a residence.

One small wetland was identified within the Klondike III proposed site boundary (W2). This wetland was classified as palustrine emergent persistent seasonal wetland (PEM1C) and is associated with a discontinuous ephemeral or intermittent drainage that runs from west to east within the vicinity of Klondike Lane, eventually running underneath Klondike Lane via a bridge crossing near Webfoot. This drainage is not a state jurisdictional water since it does not directly connect to a fish-bearing stream (Oregon Department of State Lands [DSL], 2005). However, the wetland associated with the drainage is a state jurisdictional wetland (DSL, 2005).

3.6 Fish and Wildlife

The fish and wildlife analysis area consists of a 300-foot wide corridor centered on the proposed BPA ROW and substation facilities, a 300-foot wide corridor centered on Klondike III facilities, and a 500-foot wide corridor centered on Biglow Canyon facilities. Diurnal walking surveys as well as nighttime surveys for sensitive status species were conducted for Klondike III and Biglow Canyon.

The wildlife specialist reviewed reference materials prior to the field investigation to obtain information about the type, size and location of vegetative and wildlife resources within the project corridor. The materials reviewed included USGS 7.5-minute quadrangle maps; aerial photography at various scales, the Applications for Site Certificate for the Biglow Canyon Wind Farm (WEST, 2005), and the Klondike III Wind Project (DEA, 2005). The U.S. Fish and Wildlife Service (USFWS) and the Oregon Natural Heritage Information Center (ORNHIC) were queried for information on listed and sensitive species within the 5-mile data search area. The Oregon Department of Agriculture (ODA) was contacted for information about plant distribution, protection and conservation programs. The Oregon Department of Fish and Wildlife (ODFW) was contacted for information on fish and wildlife habitat requirements and distribution. On November 18, 2005, project wildlife specialists conducted a site visit to assess habitat conditions.

3.6.1 Fish Species and Fish Habitat

The analysis area contains no habitat for fish species. Only intermittent streams are present (see Section 3.6.2.6).

3.6.2 Wildlife Habitats within the Analysis Area

The following habitats are found within the analysis area.

3.6.2.1 Upland Trees

Upland tree areas included small native trees, typically black locust, usually found within or near dry washes or draws, or next to abandoned structures. Upland trees are rare in the analysis area. Sensitive species, such as loggerhead shrike and Swainson's hawk, nest and forage in this habitat, as well as more common species such as red-tailed hawk.

3.6.2.2 Shrub-Steppe

Shrub-steppe habitat within the analysis area occurs on slopes next to canyons and intermittent streams. It consists of an overstory of sagebrush and/or various native **forbs** and both rubber rabbitbrush and yellow rabbitbrush. The understory includes native grasses such as bluebunch wheatgrass, Sandberg bluegrass, and Idaho fescue, generally with a large percent cover of invasive grasses such as cheatgrass and bulbous bluegrass. Although the habitat is often weedy in places, it can provide some degree of structure and habitat for wildlife. Loggerhead shrike forage and nest in these areas, and the shrub structure provides habitat for white-tailed jackrabbit and other prey species for raptors.

3.6.2.3 Grassland

Grassland habitat within the analysis area consists mainly of invasive species such as cheatgrass, bulbous bluegrass, and tumblemustard. Native bunchgrasses remain in small patches, typically including species such as bluebunch wheatgrass and Sandberg's bluegrass. Native forbs such as rabbitbrush are present in small patches or in draws. White-tailed jackrabbit, burrowing owl, and long-billed curlew can use this habitat for foraging and nesting.

3.6.2.4 Conservation Reserve Program

CRP lands are found on the western end of the analysis area, near the John Day Substation and between Gerking Canyon and Scott Canyon, and within both wind analysis areas. Within the CRP areas, weed cover is generally low to moderate with scattered cheatgrass and bulbous bluegrass in the spaces between robust intermediate wheatgrass and crested wheatgrass. White-tailed jackrabbit, burrowing owl, and longbilled curlew can use this habitat for foraging and nesting.

3.6.2.5 Agricultural

Agricultural areas dominate the landscape and provide little habitat for wildlife other than for small mammals and forage for ungulates and raptors. Cultivated wheat is found in monoculture on these lands, with weedy forbs occasionally found on field perimeters. Raptors such as ferruginous hawk and rough-legged hawk could use this habitat for foraging.

3.6.2.6 Intermittent Streams

Three intermittent drainages were found within the analysis area: a jurisdictional drainage in Gerking Canyon about 1 mile west of the existing John Day Substation, a jurisdictional drainage just west of Scott Canyon Road more than 2 miles west of the substation, and a jurisdictional drainage 5 miles west of the substation south of and along Herrin Road west of Helm Canyon. No water was observed in any of these, but a channel with bed and bank characteristics of varying widths and depths was present. Western toad and other amphibians could use portions of these channels. Numerous other types of wildlife require access to water sources, which could be intermittently provided by this habitat type.

3.6.3 Species Analyzed

3.6.3.1 Threatened and Endangered Species

A number of federal and state ESA-listed and candidate wildlife species have the potential to exist within the analysis area: bald eagle, peregrine falcon, yellow-billed cuckoo, and Washington ground squirrel (USFWS, 2005 and ORNHIC, 2005). The yellow-billed cuckoo has likely been extirpated from Oregon (NatureServe, 2006), and is a riparian-dependent species, with no suitable breeding or foraging habitat present in the analysis area. The Washington ground squirrel does not occur in the analysis area, as their historical range is limited to areas east of the John Day River (USFWS, 2004).

Bald Eagle

The bald eagle is a federal and state-listed threatened species. Critical habitat has not been designated for the bald eagle. No suitable nesting or foraging sites are present in the analysis area. The closest bald eagle nest is on Browns Island on the Columbia River, west of the mouth of the Deschutes River (Isaacs, 2005), which is outside the study area for the proposed projects. Wintering bald eagles do not use the upland areas within and/or near the analysis area (Kohl, 2005).

Peregrine Falcon

The peregrine falcon is a State of Oregon endangered species. It has no status under the federal ESA because it was removed from the federal list of endangered and threatened wildlife on August 25, 1999 (USFWS, 1999). Peregrine falcons are limited to

areas that contain suitable nesting ledges. Cliffs and bluffs typically found along rivers and other large bodies of water can provide habitat for nesting peregrines. Falcons prefer to nest where the concentration of prey, generally smaller birds, is high and where habitat characteristics may increase prey vulnerability.

Peregrine falcons may occur in the analysis area year-round. There are three peregrine falcon nest sites in the vicinity of the project; however, none are located within the analysis area.

3.6.3.2 Sensitive/Special Status Species

Table 3-5 lists the sensitive and special status wildlife species that may occur in the analysis area, whether suitable habitat is present, and whether the species has been observed in or near the analysis area.

3.6.3.3 Common Wildlife Species

Elk, mule deer, bighorn sheep, pronghorn and common species such as coyote and badger occur in the analysis area. Many common avian species such as horned lark and meadowlark are also regularly found within the analysis area.

Species (Scientific Name)	Federal Status	State Status	Observed/Documented in Klondike III Analysis Area	Occurrence/Habitat in Biglow Canyon Analysis Area	Occurrence/Habitat in BPA Analysis Area
Birds					
Bald eagle (Haliaeetus leucocephalus)	T/EA	Т	No foraging or nesting habitat present. May use John Day and Columbia River canyons.	No foraging or nesting habitat present. May use John Day and Columbia River canyons.	No foraging or nesting habitat present. May use John Day and Columbia River Canyons.
Peregrine falcon (Falco peregrinus anatum)		E	Potential foraging habitat present. No nesting habitat present.	Potential foraging habitat present. No nesting habitat present.	Potential foraging habitat present. No nesting habitat present.
Golden eagle (<i>Aquila chrysaetos</i>)	EA		One nest documented in the project vicinity during 2001-2003 Klondike I and II surveys. Also documented in 2004-2005 avian baseline surveys.	Observed near John Day River rock outcrops during raptor nest survey.	Potential foraging habitat present; no nesting habitat present.
Swainson's hawk (<i>Buteo swainsoni</i>)		SV	11 nests documented in the project vicinity during 2001-2003 Klondike I and Il surveys. 3 nests were documented in the project vicinity in 2004-2005 avian baseline surveys	18 observations from all surveys.	Potential foraging habitat present; nesting habitat present in upland trees.
Rough-legged hawk (<i>Buteo lagopus</i>)			Individuals documented within 2001-2003 Klondike I and II surveys as well as 2004-2005 avian baseline surveys.	Potential foraging habitat present; potential nesting habitat present in upland trees.	Potential foraging habitat present; potential nesting habitat present in upland trees.
Red-tailed hawk (<i>Buteo jamaicensis</i>)			18 nests documented in the project vicinity during 2001-2003 Klondike I and II surveys, and seen within the analysis area during 2005 sensitive species surveys.	Potential foraging habitat present; nesting habitat present.	Potential foraging habitat present; nesting habitat present.
Ferruginous hawk (<i>Buteo regalis</i>)	SoC	SC	Documented within 2001- 2003 Klondike I and II surveys. None observed during 2004-2005 Klondike III surveys.	One observation, rare.	Potential foraging habitat present; potential nesting habitat present.
Long-billed curlew (<i>Numenius</i> americanus)		SV	Documented within 2001- 2003 Klondike I and II surveys. Observed during Klondike III avian baseline surveys in eastern portion of the analysis area. No nests observed.	Observed south of proposed facility; ORNHIC lists use along John Day River up to Drapper Canyon mouth, historical nesting sites of broad county canyons.	Potential foraging habitat present; potential nesting habitat present in grasslands.
Bank swallow (<i>Riparia riparia</i>)		SU	None observed, probably migrant through analysis area.	None observed, probably migrant through analysis area.	None observed, probably migrant through analysis area.

Table 3-5 Special Status/Sensitive Species with the Potential To Occur within the Analysis Area

Species (Scientific Name)	Federal Status	State Status	Observed/Documented in Klondike III Analysis Area	Occurrence/Habitat in Biglow Canyon Analysis Area	Occurrence/Habitat in BPA Analysis Area
Columbian sharp- tailed grouse (<i>Tympanuchus</i> <i>phasianellus</i> <i>columbianus</i>)	SoC		Historical county record, no observations in ORNHIC query.	Historical county record, no observations in ORNHIC query.	Historical county record, no observations in ORNHIC query.
Western greater sage grouse (<i>Centrocercus urophasianus</i>)	SoC	SV	Regionally extirpated	Regionally extirpated	Regionally extirpated
Common nighthawk (Chordeiles minor)		SC	County record; possible, especially near riparian areas.	County record; possible, especially near riparian areas.	County record; possible, especially near riparian areas.
Eastern Oregon willow flycatcher (<i>Empidonax traillii</i> adastus)	SoC	SU	None observed	None observed, Biglow Canyon habitat possible.	None observed
Western burrowing owl (<i>Athene cunicularia</i> <i>hypugaea</i>)	SoC	SC	None observed. Suitable habitat may exist within grassland areas.	Historical county record; no observations in ORNHIC query.	Potential foraging habitat present; potential nesting habitat may exist within grassland areas.
Grasshopper sparrow (<i>Ammodramus</i> savannarum)		SV/SP	Common in non- agricultural habitat.	Common in non- agricultural habitat.	Common in non- agricultural habitat.
Lewis' woodpecker (<i>Melanerpes lewis</i>)	SoC	SC	No observations, probably migrant through facility area.	No observations, probably migrant through facility area.	No observations, probably migrant through facility area.
Western bluebird (Sialia mexicana)		SV	None observed, possible use of facility tree lots and/or barns	None observed, possible use of facility tree lots and/or barns.	None observed, possible use of facility tree lots and/or barns
Western meadowlark (Sturnella neglecta)		SC	Abundant.	Abundant.	Abundant.
Yellow-breasted chat (<i>Icteria virens</i>)	SoC	Soc	Habitat lacking; irregular migrant potentially through analysis area.	Habitat lacking; irregular migrant potentially through analysis area.	Habitat lacking; irregular migrant potentially through analysis area.
Loggerhead shrike (<i>Lanius ludovicianus</i>)		SV	Documented within 2001- 2003 Klondike I and II surveys. Observed once during the winter avian baseline surveys. Documented in one location within the analysis area and two locations outside of the analysis area during 2005 sensitive species surveys.	Uncommon. Potential foraging habitat present; potential nesting habitat may exist within upland tree areas.	Potential foraging habitat present; potential nesting habitat may exist within upland tree areas.

Species (Scientific Name)	Federal Status	State Status	Observed/Documented in Klondike III Analysis Area	Occurrence/Habitat in Biglow Canyon Analysis Area	Occurrence/Habitat in BPA Analysis Area
Mammals					
California bighorn sheep (<i>Ovis canadensis</i> <i>californiana</i>)	SoC		Unlikely to Occur	Observed east of John Day on south rim of Columbia River; might use river canyon slopes north and east of analysis area.	Observed east of John Day on south rim of Columbia River; might use river canyon slopes north and east of analysis area.
White-tailed jackrabbit (<i>Lepus townsendii</i>)		SU	Five individuals documented within 2001- 2003 Klondike I and II surveys. At least one individual documented outside the analysis area during 2005 sensitive species surveys.	Observed, uncommon.	Potential foraging habitat present; species seen along project corridor during Biglow Canyon Wind Farm surveys in grasslands
Hoary bat (<i>Lasiurus cinereus</i>)			Probably migrant through analysis area.	Probably migrant through analysis area.	Probably migrant through analysis area.
Long-eared myotis (<i>Myotis evotis</i>)	SoC	SU	Unknown	Unknown	Unknown
Long-legged myotis (<i>Myotis volans</i>)	SoC	SU	Unknown	Unknown	Unknown
Pale western big- eared bat (Corynorhinus townsendii pallescens)	SoC	SC	Unknown	Unknown	Unknown
Pallid bat (Antrozous pallidus pallidus)		SV	Unknown	Unknown	Unknown
Silver-haired bat (Lasionycteris noctivagans)	SoC	SU	Probably migrant through analysis area.	Probably migrant through analysis area.	Probably migrant through analysis area.
Western small-footed myotis (<i>Myotis ciliolabrum</i>)	SoC	SU	Unknown	Unknown	Unknown
Yuma myotis (<i>Myotis yumanensis</i>)	SoC		Unknown	Unknown	Unknown
Amphibians and Reptiles					
Northern leopard frog (<i>Rana pretiosa</i>)		SC	None observed, not likely to occur.	None observed; habitat possible at pond near Emigrant Springs Road.	None observed, not likely to occur.
Western Toad Bufo boreas		SV	None observed, habitat possible in larger ravines.	Observed in upper Biglow Canyon.	None observed, habitat possible in larger ravines.
Painted turtle (Chrysemys picta)		SC		None observed; habitat possible at pond near Emigrant Springs Road.	<u>No open water habitat</u> present, not likely to occur.
Western rattlesnake (Crotalus viridis; C.v. oregonus)		SV	Likely common in native shrub-steppe and ravine habitat.	Observed; likely common in native shrub-steppe and ravine habitat.	Likely common in native shrub-steppe and ravine habitat.

3.7 Vegetation

The analysis area for vegetation consists of the area within 300 feet of the proposed BPA facilities (including centerlines of the two alternative transmission line routes), within 300 feet of the proposed Klondike III Wind Project facilities, and within 500 feet of the proposed Biglow Canyon Wind Farm project facilities, including wind turbine corridor boundaries. On November 18, 2005, project vegetation specialists conducted a site visit to assess vegetation conditions.

Vegetation communities found in the analysis area include the following: upland trees, shrub-steppe, CRP, and agriculture. These communities, their representative species, and typical location in the landscape are described in Section 3.6.2.

3.7.1 Special-Status Plant Species (Federal and State)

No threatened or endangered plant species were identified as present in the analysis area (Oregon Natural Heritage Information Center, 2005). The following rare or special status species may occur in the project vicinity; however, there are no records of any of these species within the analysis area and none were found during field visits (DEA, 2005; CH2MHill, 2005).

- Henderson's needlegrass (Achnatherum hendersonii)
- Dwarf suncup (Camissonia pygmaea)
- Vernal pool mousetail (Myosurus sessilis)
- Whitehead navarretia (Navarretia leucocephala)
- Laurence's milkvetch (Astragalus collinus var. laurentii)
- Disappearing monkeyflower (*Mimulus evanescens*)
- Liverwort monkeyflower (Mimulus jungermannioides)
- Northern wormwood (Atemisia campestris v. wormskioldii)
- Henderson's ricegrass (Achnatherum collinus v. laurentii)
- Robinson's onion (Allium robinsonii)

3.7.2 Weeds and Undesirable Vegetation

3.7.2.1 Agricultural Lands

Agricultural lands within the analysis area are plowed, seeded, and harvested annually, mainly with wheat species. Herbicide spraying is common, widespread, and takes place at several stages during the year. The adjacent edge habitat is dominated by weeds typically found in these margins, mainly cheatgrass, Russian thistle, and ryegrass.

3.7.2.2 Other Lands

Native vegetation communities, such as upland trees, shrub-steppe, and grasslands within the analysis area have a large proportion of non-native and invasive weed species such as cheatgrass, bulbous bluegrass, and tumblemustard. Generally, no weed control is conducted within these communities. Within CRP lands, weed cover is generally low to moderate with scattered cheatgrass and bulbous bluegrass. Weed control in CRP lands is required, and would generally include spraying for broadleaf weeds. This herbicide control is most intensive in the early period of CRP establishment, and is not usually continued after full establishment of CRP has taken place. Burning is a seldom-used control method for weeds due to expense and fire danger.

3.8 Visual Resources

The analysis area for visual resources is the area within 30 miles of the Klondike III Wind Project and the Biglow Canyon Wind Farm. This area includes BPA's action alternatives.

The general landscape character features rolling hills in dry land winter wheat production or grasses dedicated to conservation easements through the CRP administered by the NRCS. Most of the analysis area is in wheat production. Very little acreage of native plant communities remains, occurring in small patches along tributaries and unnamed drainages to the Columbia, John Day, and Deschutes rivers.

The Deschutes River Canyon and John Day River Canyon are important features draining to the Columbia River. Basalt cliffs and rock outcrops are typical within the river canyons and are important visual elements. Where vegetation is not in agricultural production or conservation, it is characterized by shrub-steppe habitat typical to Central Oregon. Trees are very sparse, usually occurring in ravines or near the few home sites as shelter belts. The Cascade Mountains, including Mount Hood and other peaks and ridgelines, are visible in the distant background during clear conditions when not blocked by local topography.

Multiple transmission and distribution lines cross the analysis area as well as transportation corridors including the Columbia River, I-84, U.S. 97, SR-206, and SR-14. Existing wind turbines and substation facilities are also visible.

Several important visual resources have been identified in the analysis area (see Table 3-6 and Map 7). Summaries of these resources are provided in this section.

	Direction/Distance (miles) from			
Visual Resource	BPA Action Alternatives	Klondike III Wind Project	Biglow Canyon Wind Farm	
Columbia River Gorge National Scenic Area	West, 9	Northwest, 12.2	West, 10	
John Day River Canyon	East, 2.5	East, 0.8	West, 23	
Oregon National Historic Trail High Potential Sites:				
Fourmile Canyon	East, 25	East, 20	East, 23	
John Day River Crossing (a.k.a. McDonald Ferry)	Southeast, 4	East, 2	Southeast, 6	
Biggs Junction	West, 7	Northwest, 11	West, 8	
Deschutes River Crossing	West, 10	Northwest, 13.5	West, 11	
The Dalles Complex	West, 24	West, 28	West, 25	
Lower Deschutes River Canyon	West, 9	West, 8	West, 10	
Lower Klickitat River Canyon	West, 25	Northwest, 27.5	West, 26	
Journey Through Time Scenic Byway	Southwest, 1.5	West, 0.5	West, 2	

Table 3-6 Important Visual Resources within the Analysis Area

3.8.1 Columbia River Gorge National Scenic Area

The Columbia River Gorge National Scenic Area (CRGNSA) is managed for an "unparalleled combination of scenery, geology, plants, wildlife, and multicultural history" (Columbia River Gorge Commission and USDA Forest Service [USFS], 1992). The exceptional beauty of this region is largely derived from its diverse character. Key Viewing Areas (KVAs) are important viewpoints open to the public offering opportunities to view the Gorge. KVAs within the analysis area include the Historic Columbia River Highway, I-84, Washington SR-14, the Columbia River, and Rowena Plateau (i.e., Tom McCall Preserve). Designated Scenic Travel Corridors in the analysis area include the Historic Columbia River Highway, I-84, SR-14, U.S. 97 and SR-142.

3.8.2 John Day River Canyon

The John Day River landscape within the analysis area features high desert communities of sagebrush and juniper with intermingled private ranches adding visual interest along the river (BLM, 2000). The John Day River Canyon (i.e., the area from rim to rim) is identified as an "area of high visual quality" (BLM, 1986). The BLM manages its lands in this area as a Visual Resource Management (VRM) Class II resource, meaning management activities resulting in changes to the existing character of the landscape may be allowed, provided they do not attract the attention of the casual observer (BLM, 2000).

Beginning at Tumwater Falls near river mile 10 upstream through the analysis area, the river is a designated Federal Wild and Scenic River and classified as Recreational. Outstanding remarkable values in this segment include "scenic, recreation, fish, wildlife, geological, paleontological, and archaeological" values. The segment is designated as a

State Scenic Waterway pursuant to the Oregon State Scenic Waterways Act, ORS 390.805-390.925.

The Two Rivers Resource Management Plan Record of Decision (BLM, 1986) identifies two Special Management Areas relevant to this project: the Oregon Trail Historic Sites at Fourmile Canyon and McDonald Ferry, and the John Day River Canyon. For the trail sites, "the unusual qualities of these sites will be maintained and protected" (BLM, 1986). For the canyon, "areas of high visual and natural quality will continue to be protected while allowing other compatible uses in the same area" (BLM, 1986).

3.8.3 Oregon National Historic Trail

In 1978, Congress authorized the Oregon National Historic Trail Committee to commemorate the historic Oregon Trail and to promote its preservation, interpretation, public use, and appreciation. The National Park Service produced *The Management and Use Plan Update Final Environmental Impact Statement Oregon National Historic Trail and Mormon Pioneer National Historic Trail* (USDI National Park Service [NPS], 1999), to coordinate broad-based policies, guidelines, and standards for administering the trail to guide its protection, interpretation, and continued use.

Within the analysis area, the plan identifies five High-Potential Sites based on "historic significance, the presence of visible historic remnants, scenic quality, and relative freedom from intrusion" (NPS, 1999). These sites include Fourmile Canyon, John Day River Crossing (a.k.a. McDonald Ferry), Biggs Junction, Deschutes River Crossing, and The Dalles Complex. The plan does not identify specific scenic or aesthetic values in the analysis area beyond these five sites. Intact segments or other visual evidence (e.g., wagon ruts, scars) of the trail are not known to exist within the analysis area. Nearly all evidence of the trail within the analysis area has been obliterated through agricultural practices over the years.

3.8.4 Lower Deschutes River Canyon

The Lower Deschutes River is a designated Federal Wild and Scenic River and Oregon State Scenic Waterway. The Lower Deschutes Canyon "contains a diversity of landforms, vegetation and color" (BLM, 2001) where the river has carved a dramatic canyon through rugged Columbia River basalt flows. Riparian vegetation provides stark contrast against the broken reddish brown canyon walls. Transportation corridors (roads and railroad), and rural development occur in several areas throughout the canyon.

3.8.5 Lower Klickitat River Canyon

The lower 10 miles of the Klickitat River from its confluence with Wheeler Creek, near the town of Pitt, to its confluence with the Columbia River is designated a Federal Wild and Scenic River with a Recreational classification. Outstandingly remarkable resources include the river's free-flowing nature, resident and anadromous fish and their habitats, Native American dip-net fishing, and the geology of the lower gorge (USFS, 1991).

3.8.6 Journey Through Time Scenic Byway

The Journey Through Time Scenic Byway is administered through the ODOT Scenic Byway Program. The portion of the scenic byway within the analysis area is US 97 in Oregon.

The Journey Through Time Management Plan speaks to the rural heritage and history of the 286-mile route through north central Oregon. The plan establishes four goals: create jobs; maintain rural lifestyles (i.e., support traditional industries of agriculture and timber); protect important values (e.g., historical attractions); and build identity for the north central Oregon region. The plan identifies the communities of Wasco, Moro, and Grass Valley, the Historic Oregon Trail and Barlow Road, and the Sherman County Museum as points of interest within the analysis area.

3.9 Socioeconomics

This analysis uses U.S. Census Bureau information from the 1990 and 2000 decennial censuses but, where appropriate, also includes data from state and local agencies. Sherman County, its incorporated communities, and block groups (BG) are the census areas used for determining the effects to the socioeconomic characteristics in the analysis area. Because only one census tract (9501) covers the entire county, county and census tract demographic information are the same, and because of the low population of the analysis area, block groups are quite large and include some geographic areas that would not likely be affected by the proposed project.

There are two BGs within the analysis area. Block Group 1 covers the eastern portion of the county, including the town of Rufus, from US 97 north of Wasco and OR 206, south of Wasco to the eastern county boundary. Wasco is not part of BG 1. Block Group 2 includes the town of Wasco and all land west of US 97 and OR 206 from the Columbia River to the western county boundary and down to just north of the community of Moro. The southern boundary is generally Monkland Lane.

3.9.1 Population

The analysis area is entirely within Sherman County, which has four incorporated communities: Grass Valley, Moro, Rufus and Wasco. Rufus and Wasco are near the proposed project; Moro (county seat) and Grass Valley are in the southern portion of the county. The estimated 2003 population for Sherman County is 1,900 residents. Wasco is the largest community in the county with an estimated 380 residents.

Between 1990 and 2003, Sherman County population decreased slightly by 18 residents, or about one percent of its total population. Rufus has lost residents,

declining by about 9 percent since 1990, while Wasco grew slightly, adding a handful of residents for the same period (Population Research Center, 2005).

According to census data, population in Sherman County rural areas appears to be more stable than local communities. Population increases in rural areas countered losses in incorporated communities in BG 1. Overall, BG 1 lost 15 residents between 1990 and 2000, but Rufus (included in BG population), actually lost 27 residents, which means that rural portions of the BG appear to have added 12 residents, reducing the overall loss of population in the entire BG to less than what was lost in Rufus. BG 2 grew between 1990 and 2000, increasing its population by about 7 percent (39 residents). Most of this growth also appears to have occurred in rural areas because Wasco, the block group's population center, grew by only seven residents.

3.9.2 Housing

The most recent housing data for Sherman County and its communities are from the 2000 decennial census. Because population has generally remained stable or declined in the county, current vacancy rates are assumed to be similar to those reported in the 2000 Census. The 2000 census reported that there were 935 housing units in Sherman County, as shown in Table 3-7. Of those, 523 are within BG 1 and 2.

Vacancy rates are shown in Table 3-7. In 2000, housing vacancy rates in the county area were relatively high, with the highest vacancy rates found in Rufus at 21 percent.

Census Geographic Area	Housing Units				
	Total	Occupied	Vacant	Percent Vacant	
Sherman County	935	797	138	14.8%	
Rufus	162	128	34	21.0%	
Wasco	199	171	28	14.1%	
Census Tract 9501	935	797	138	14.8%	
CT 9501, BG 1	230	192	38	16.5%	
CT 9501, BG 2	293	256	37	12.6%	

Table 3-7 Housing Supply and Availability in Sherman County and Project Vicinity, 2000

Source: US Census Bureau SF-3

3.9.3 Lodging

Several lodging options are available near the proposed projects and have been used in the past during construction of the Klondike I and II Wind Projects. During construction of the first two phases, construction workers were housed in motels in the communities of Moro and Biggs Junction, and in a recreational vehicle (RV) park in Wasco. There are also several motels located in The Dalles in Wasco County west of Sherman County. As a part of the Biglow Canyon Wind Farm ASC (CH2MHill, 2005), <u>PGE</u> identified over 750 hotel and motel rooms within a 30-mile range of the proposed Biglow Canyon Wind Farm. Additional rooms could also be available in establishments not identified as a part of the application. Other lodging could be found in Goldendale, Washington, and in overnight facilities at Oregon state parks and private RV campgrounds. Memaloose and Deschutes state parks together have nearly 100 sites that can accommodate RVs. Additional sites are also available for tents at both parks.

3.9.4 Social Characteristics

3.9.4.1 Age

The analysis area and Sherman County as a whole have a higher percentage of residents 50 years or older than the state as a whole. The population within the analysis area is generally similar to the state in the percentage of residents younger than 19 years old, but the percentage of county residents between 20 and 29 years old accounts for a much smaller portion of the population compared to other age cohorts and the state. The drop in residents within that age cohort could be attributed to young people leaving the county after high school and lack of local employment or college education opportunities in the county. The percentage of the county population between 30 and 39 years is within 4 percent of the state's overall population for that age group. For all age groups over 40, the county percentage (as well as that of Rufus, Wasco, and BG 2) exceeds that of the state as a whole.

3.9.4.2 Poverty

According to the 2000 census, the percentage of individuals and families living in poverty in Oregon was 11.6 percent and 7.9 percent, respectively, which was lower than Sherman County where the percentage of individuals and families in poverty was 14.6 percent and 12.3 percent, respectively. BG 1 has a slightly lower percentage of individuals in poverty, but has a higher percentage of families in poverty than the county as a whole. BG 2 is just the opposite, with a higher number of individuals in poverty at 15 percent and about 10 percent of families in poverty. Wasco has a lower poverty rate for individuals and families than the county. In all geographies, residents between 18 and 64 years old accounted for the highest percentage of individuals in poverty.

3.9.4.3 Race and Ethnicity

Minorities within Sherman County account for just 3 percent of the total population, compared to the state where about 16.5 percent of the total population is within a minority group. In general, minorities account for between 3 to 5 percent of the population in the analysis area.

3.9.5 Unemployment

Since 2000 Sherman County has had higher unemployment levels than the state. Sherman County's unemployment rate climbed from a relatively low 5.9 percent in 2000 to 11.9 percent in 2003. The increase was due to the loss of a single industry, aluminum manufacturing, which relied on low power costs to provide a comparative advantage. When aluminum production slowed in 2001, unemployment in the county increased rapidly. While unemployment rates have fallen recently because people have moved out of the county, travel outside the county for work, or because some unemployed may no longer be seeking work, the county still has an unemployment rate much higher than the state as a whole. In 2004, the county unemployment rate was nearly 10 percent, more than 2 percent higher than Oregon's. While some seasonal employment in the county is available, income from seasonal positions is generally lower than what the aluminum plants paid and the employment is generally less stable (Oregon Employment Department, 2005).

3.10 Cultural Resources

Cultural resources field inventories were conducted within the proposed alternative BPA transmission line routes and substation areas, within a 300-foot corridor around the proposed Klondike III Wind Project facilities, and within a 500-foot corridor around the proposed Biglow Canyon Wind Farm facilities. A portion of BPA's Middle Alternative was not surveyed because BPA could not obtain permission from current landowners to conduct the field inventory.

The field inventories identified historic properties and cultural resources. Methods of investigation included a literature review and records search (including records of the Oregon State Historic Preservation Office [SHPO]), as well as field investigations. The fieldwork consisted of the systematic pedestrian survey of the proposed turbine string alignments, laydown areas, new roads, overhead and underground utility lines, substations, meteorological towers, improvements to existing roads, and a wildlife mitigation area. In addition to the field inventories, BPA has consulted with five upper Columbia River tribes – the Confederated Tribes of the Warm Springs Indian Reservation, the Confederated Tribes of the Umatilla Reservation, the Yakama Indian Nation, the Wanapum Tribe, and the Nez Perce Tribe – about the proposed project.

3.10.1 Resources near the Proposed Transmission Line Routes

The archaeological survey examined about 473 acres and identified four archaeological resources within the analysis area (Archaeological Investigations Northwest, Inc. [AINW], 2005a, 2005b). Two of the resources are located within the Proposed Action corridor, and the remaining two resources are within the proposed Middle Alternative corridor. The four resources consist of two prehistoric isolates (fewer than 10 artifacts), one historic-period isolate, and one historic-period site. No historic or archeological resources were identified near the proposed substation site. A projectile point fragment was found on a gently-rolling high point overlooking Biglow and Emigrant canyons. One colorless machine-made glass bottle neck and two fragments of a colorless square glass bottle were also found within 16 feet of the projectile point. These bottle fragments had no identifying marks but likely date to the early or mid-1900s.

Scattered historic-period artifacts and the remains of a demolished structure were found north of Klondike Lane. Within the proposed transmission line corridor, AINW found one brick fragment, one piece of window glass, and four pieces of whiteware ceramics. The structural remains are located outside the current analysis area. The second school in Sherman County, Jacks School, was established in the 1880s (AINW, 2005a).

Artifacts found near Wasco-Rufus Road included one aqua glass machine-made bottle base that had no marks, one aqua glass machine-made bottle neck, one insulator fragment, and one colorless glass bottle base. It is likely that these artifacts are roadside debris rather than evidence of more extensive deposits.

A single tan cryptocrystalline silicate flake was found at the bottom of Gerking Canyon. No other artifacts were found within the analysis area at this location, and the context of this find suggests that this flake is a secondary deposit.

Most of the proposed BPA action alternatives' routes are within lands that were under wheat cultivation at the time of the survey. These fields varied between recentlyplanted winter wheat that was up to 4 inches tall, harvested wheat (stubble and debris left on the ground), and plowed fields (no debris or new growth). Ground surface visibility within recently-planted fields ranged between 20 and 80 percent, depending upon how recently the ground was seeded. Wheat fields that had been harvested had highly variable ground surface visibility (between 5 and 95 percent). Portions of the analysis area were also left fallow or used as range land, resulting in a ground cover of tall grass and virtually no ground surface visibility.

Modern debris was found scattered sporadically along most of the roadside portions of the analysis area, and especially alongside major connector roads (such as Wasco-Rufus Road). Very few developments, modern or historic-period, are within the proposed route corridors. One complex of historic-period buildings is located on the north side of Medler Lane. These buildings were used by the Medler family, one of the early and important residents of Sherman County (AINW, 2005a).

Both the Proposed Action and Middle Alternative cross portions of the Oregon Trail (known at the time as the Emigrant Road) through what are today cultivated fields. While the portion of the Oregon Trail crossed by the Middle Alternative was not surveyed, no evidence of the trail was observed during the pedestrian survey of the Proposed Action. One fossilized large mammal limb bone was observed in a road cut on the north side of Gerking Canyon Road.

There are no historic resources listed on or eligible for listing on the National Register of Historic Places (NRHP).

3.10.2 Klondike III Wind Project

As part of the ASC process, field surveys identified <u>seven</u> archaeological resources (Archaeological Investigations Northwest, Inc. 2006, DEA, 2005). Three of these resources are prehistoric archaeological isolates (each represents the find of a single artifact); <u>a</u> fourth is a small assemblage of historic-period refuse (also recorded as an archaeological isolate), and another is an historic period early Oregon homestead. This property may be eligible for listing on the NRHP. Two additional areas with potential resources were also identified during a pedestrian survey; however, these areas had inadequate ground visibility due to the presence of crops to determine the existence of any cultural resource site.

A number of <u>other</u> historic-period resources within the analysis area were also identified. Most of these resources are buildings and structures associated with private ranching operations. Most of these resources have been altered or modified from their original design or lack any distinguishing characteristics.

The Oregon Trail alignment through the Klondike III Wind Project area is a designated historic trail under both federal and Oregon statutes. The alignment of the trail, as best it can be reconstructed, crosses the northeastern portion of the Klondike III Wind Project area. No physical evidence of the trail was observed at any of these locations or anywhere else in the field survey. All of the reported locations of intact trail segments were agricultural fields, and farming activity is likely to have obliterated most—if not all—physical traces of the trail.

During a site visit with the elders of the Warm Springs Indian Reservation, tribal members expressed concern about cultural resources being encountered during wind turbine construction in some portions of the Klondike III Wind Project area.

3.10.3 Biglow Canyon Wind Farm

There are no historic properties in the area of the Biglow Canyon Wind Farm listed on the NRHP. Field surveys identified three historic sites and one historic archaeological site that were recorded with the SHPO. Homestead A was a wheat farm and cattle ranch operation. Homestead B is an abandoned Victorian farmhouse with associated outbuildings and cached older farm equipment which does not likely meet criteria for listing on the NRHP.

The historic building is an isolated garage building presently used for storage. This building is architecturally undistinguished and it is not known to be associated with events that have made a major contribution to the broad patterns of our history, nor is it associated with the lives of persons significant in our past. The building does not likely meet NRHP eligibility criteria.

The archaeological site is a small historic period surface dump feature. This site is small, lacks appreciable depth, and (it or its artifact contents) cannot be clearly associated with any particular person in the historic record. This archaeological site is believed to be ineligible for listing in the NRHP.

During a site visit with the elders of the Warm Springs Indian Reservation, tribal members expressed concern about cultural resources being encountered during wind turbine construction in some portions of the Biglow Canyon Wind Farm area.

3.11 Noise, Public Health and Safety

Transmission facilities and wind projects provide electricity for heating, lighting and other services essential for public health and safety. These same facilities can potentially harm humans. Contact with transmission lines or turbines can kill or injure people and damage aircraft. This section describes public health and safety concerns such as electric shock, fires, and *electric and magnetic fields* related to transmission facilities, wind projects or construction activities.

Potential hazards include fire (both natural and human-caused), and interference with aircraft.

The Federal Aviation Administration establishes requirements for towers and other tall structures such as wind turbines that could potentially interfere with aircraft safety. Structures taller than 200 feet may require a flashing warning light for aircraft safety.

Transmission lines, like all electric devices and equipment, produce electric and magnetic fields, most commonly referred to as EMF. Current, the flow of electric charge in a wire, produces the magnetic fields. Voltage, the force that drives the current, is the force of the electric field. The strength of electric and magnetic fields depends on the design of the line and on the distance from the line. Field strength decreases rapidly with distance.

3.11.1 Noise

Audible noise (AN), as defined here, represents an unwanted sound, as from a transmission line, transformer, airport, or vehicular traffic. Sound is a pressure wave caused by a sound source vibrating or displacing air. The ear converts the pressure fluctuations into auditory sensations. AN from a source is superimposed on the background or ambient noise that is present before the source is introduced.

Environmental noise, including transmission line noise, is usually measured in *decibels* on the A-weighted scale (dBA). This scale models sound as it corresponds to human perception. Table 3-8 shows typical noise levels for common sources expressed in dBA.

Sound Level dBA	Noise Source or Effect
110	Rock and roll band
80	Truck at 50 feet
70	Gas lawnmower at 100 feet
60	Normal conversation indoors
50	Moderate rain falling on foliage
40	Refrigerators
26	Ambient noise in analysis area
25	Woods during calm breeze

Table 3-8 Common Noise Levels

3.11.1.1 Transmission Line Noise

Corona is the partial electrical breakdown of the insulating properties of air around the conductors of a transmission line. In a small volume near the surface of the conductors, energy and heat are dissipated. Part of this energy is in the form of small local pressure changes that result in audible noise. Corona-generated audible noise can be characterized as a hissing, crackling sound that, under certain conditions, is accompanied by a 120-Hz hum. Corona-generated audible noise is of concern primarily for contemporary lines operating at voltages of 345-kV or higher and generally during foul weather.

The conductors of high-voltage transmission lines, i.e., those of 230-kV and above, are designed to be corona-free under ideal conditions. However, protrusions on the conductor surface, particularly water droplets on or dripping off the conductors, cause electrical fields near the conductor surface to exceed corona onset levels, and corona occurs. Therefore, audible noise from transmission lines is generally a foul-weather (wet conductor) phenomenon. Wet conductors can occur during periods of rain, fog, snow or icing. Based on the meteorological records near the routes of the proposed transmission lines, such conditions are expected to occur about 6 percent of the time during the year in the Wasco area.

For a few months after the line would be built, residual grease or oil on the conductors could cause water to bead up on the surface. This would result in more corona sources and a slightly higher level of audible noise and electromagnetic interference in the line. However, as new conductors "age" in the first few months, the level of corona activity decreases to the predicted equilibrium value. During fair weather, insects and dust can also collect on conductors and serve as a source of corona.

The area where the two transmission line alternatives would be located has an ambient noise level of about 26 dBA (CH2MHill, 2005).

3.11.1.2 BPA Substation Noise

Audible noise from substations is generated predominantly by equipment such as transformers, reactors and other wire-wound equipment. It is characterized by a 120 Hz hum that is associated with magnetic-field caused vibrations in the equipment. Noise from such equipment varies by voltage and other operating conditions. The BPA design level for substation noise is 50 dBA at the substation property line for new construction (USDOE, 2006). The design level is met by obtaining equipment that meets specified noise limits and, for new substations, by securing a no-build buffer beyond the substation perimeter fence. The existing John Day 500-kV Substation has no noise-making equipment and has an ambient noise level of about 26 dBA (CH2MHill, 2005). Periodically, disconnect switches engage and emit a blast.

3.11.1.3 Wind Projects

The project area is rural, and ambient noise levels are low (about 26 dBA [CH2MHill]), with infrequent noise from agricultural activities. DEQ regulations at OAR 340-035-0035 establish noise standards at sensitive receptors. At the proposed project sites, residences are the only noise sensitive properties identified. The noise level in the area where the two wind projects would be located has an ambient noise level of about 26 dBA (CH2MHill, 2005).

New noise sources on sites that have not previously been used for commercial or industrial purposes have a limit on the allowable increase over existing ambient noise levels. Generally, sources on new sites may not increase the noise levels by more than 10 dBA unless 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. This effectively allows for a noise level of no more than 36 dBA (26 dBA background + 10 dBA increase) at noise sensitive properties.

Wind turbines and transformers can cause noise that may exceed the noise limit and would require mitigation.

3.11.2 Electric and Magnetic Fields (EMF)

Electric and magnetic fields are found around any electrical wiring, including household wiring and electrical appliances and equipment. Throughout a home, the electric field strength from wiring and appliances is typically less than 0.01 kilovolts per meter (kV/m). However, fields of 0.1 kV/m and higher can be found very close to electrical appliances.

3.11.2.1 Electric Fields

There are no national guidelines or standards in the Unities States for electrical fields from transmission lines. Oregon has adopted a maximum of 9-kV/m in areas that are accessible by the public and applies only to transmission lines of 230-kV or above

longer than 16 km (10 miles) and crossing more than one city or county in the state. It is basically a safety standard to reduce risks of electric shocks and burns.

BPA designs new transmission lines to meet its electric-field guideline of 9-kV/m maximum strength on the ROW and maximum field strength of 5-kV/m at the edge of the ROW.

3.11.2.2 Magnetic Fields

Average magnetic field strength in most homes (away from electrical appliances and home wiring) is typically less than 2 *milligauss* (mG). Very close to appliances with high current, fields of tens or hundreds of mG are present. Typical magnetic field strengths for some common electrical appliances are given in Table 3-9. Unlike electric fields, magnetic fields from outside power lines are not reduced in strength by trees or building materials. Transmission lines and distribution lines (the lines feeding a neighborhood and a home), can be a major source of magnetic field exposure throughout a home located close to the line.

There are no national standards or guidelines in the U.S. for magnetic fields. Oregon and Washington have no magnetic field limits and BPA does not have a guideline for magnetic fields exposures.

Appliance	Magnetic Field (mG)		
Appliance	(One foot from a common appliance)		
Coffee maker	1 – 1.5		
Electric range	4 - 40		
Hair dryer	0.1 to 70		
Television	0.4 – 20		
Vacuum cleaner	20-200		
Electric Blanket	15-100		

Table 3-9 Typical Magnetic Field Strengths

3.11.2.3 Electromagnetic Interference

Corona on transmission line conductors can generate electromagnetic noise in the frequency bands used for radio and television signals. The noise can cause radio and television interference (RI and TVI). In certain circumstances, corona-generated electromagnetic interference (EMI) can also affect radio reception in the AM broadcast band (535 to 1605 kilohertz [kHz]), communications systems and other sensitive receivers. FM radio reception is rarely affected. Generally only residences very near to transmission lines can be affected by RI.

Interference with electromagnetic signals by corona-generated noise is generally associated with lines operating at voltages of 345-kV and above. This is especially true of interference with television signals.

Corona-caused TVI occurs during foul weather and is generally of concern for transmission lines with voltages of 345-kV and higher, and only for conventional receivers within about 600 feet of such a line.

No state in the U.S. has limits for RI or TVI. Electromagnetic interference from power lines is governed by the Federal Trade Communication Commission (FCC).

3.11.2.4 Wind Projects

The wind projects would use 34.5-kV collectors to collect power from the wind turbines. Klondike III's circuits would all be below ground; Biglow Canyon would use above ground and below ground collectors. Above ground circuits emit electric fields and are measurable at the ground; however, buried cables, buried at a depth of 4 feet, emit no electric fields since the electric field is contained within the buried cables.

Maximum magnetic fields are measured at 1 meter above the ground. Both buried cables and overhead conductors emit magnetic fields.

3.11.3 Toxic and Hazardous Substances

3.11.3.1 BPA Operations

Minimal amounts of hazardous waste result from routine maintenance procedures performed on substation equipment and transmission lines. Kinds and volumes of waste such as oily rags, minor leaks from vehicles, etc., depend on the maintenance procedure.

3.11.3.2 BPA Substation Equipment

The two circuit breakers and associated disconnect switches BPA proposes to add at the existing John Day 500-kV Substation would not contain oil. The proposed John Day 230-kV Substation would have an oil containment system for the new transformers. The new transformers would not contain PCBs. BPA has a Spill Prevention Control and Countermeasure Plan that puts in place protocols and procedures for response in case a spill occurs.

3.11.3.3 Wind Projects Operations

Hazardous materials that would be used on the projects would include lubricating oils, cleaners and pesticides that would be used primarily during operations, but potentially during construction as well. These materials would be properly stored at the O&M facilities for both projects.

3.11.4 BPA Right-of-Way Vegetation Management

Vegetation is maintained for safe operation and to allow access to the towers. The vegetation would be managed as guided by BPA's Transmission System Vegetation Management Program Environmental Impact Statement (EIS) (DOE/EIS-0285), which is incorporated by reference, and with landowners' management practices.

3.11.5 Fire and Fire Protection

Fires on or near the ROW can jeopardize safe and reliable operation of transmission lines. Besides physical damage from heat and flames, smoke and hot gases from a fire can cause arcing between lines, between lines and a tower, or between lines and the ground. Such occurrences can pose a threat to the safety of personnel in the area, such as firefighters, and can result in line outages. To prevent fires and other hazards, safe clearances are maintained between the ground and the lines. BPA also prohibits storage of flammable materials on its ROWs. Transmission towers are tall structures that may be struck by lightning. Because the towers are electrically grounded, the current from the lightning strike passes directly into the ground, with minimal risk of starting a fire.

The proposed wind projects and transmission line alternatives are in the North Sherman Fire Protection District based in Wasco. The District provides fire protection and has trained EMT volunteers, although the District does not provide ambulance service. The District contracts with the Moro Rural Fire Protection District to provide ambulance service. The North Sherman Rural Fire Protection District has one volunteer trained in high angle rescue, specifically for potential accidents occurring on wind generation towers or aboveground collector lines. No incidents at existing wind power facilities within the district have occurred that would require this service. Local farmers also provide fire suppression and are often the first to respond because of the large service areas. Local service providers state that farmers often have their own fire equipment and also often respond to emergencies.

3.11.6 Sheriff Services

The Sherman County Sheriff's Department provides police service for all of Sherman County, including the proposed transmission line alternatives and wind projects. Other sheriff's departments within the analysis area include the Gilliam County Sheriff's Department and the Wasco County Sheriff's Department. The Wasco County Sheriff's Department is the largest of the three Oregon departments, with 17 full-time deputies, due to the much larger population it serves. Sherman and Gilliam counties employ four to five full-time deputies. All three departments have agreements to provide backup service for each other if needed.

According to the Sherman County Sheriff, no events have occurred at the existing wind facilities that required law enforcement services.

3.11.7 Health Care

The Mid-Columbia Medical Center, located in The Dalles, is the only full service medical facility located within the analysis area. The center provides emergency services as well as surgery. If an accident were to occur at the site, ambulance service from the Moro Rural Fire Protection District would transport patients to the hospital. Evacuation via helicopter is also available, if needed.

3.12 Air Quality

The Clean Air Act of 1970 empowered the U.S. Environmental Protection Agency (EPA) to establish air quality standards for six criteria air pollutants: ozone, carbon monoxide (CO), lead, nitrogen dioxide, particulate matter (PM-2.5, PM-10), and sulfur dioxide. The EPA uses these six criteria pollutants as indicators of air quality. For each of these pollutants, the EPA has determined a maximum concentration above which adverse effects on human health may occur. These threshold concentrations are called National Ambient Air Quality Standards (NAAQS), and it is when an area exceeds these standards that it is designated as a nonattainment area. Pollution control measures are mandated for federal actions in nonattainment areas.

A nonattainment area can be listed for any one, or more, of the criteria pollutants. An area that was once a nonattainment area, but has since improved its air quality enough so that it now meets the EPA established air quality standards, is up-graded to a **maintenance area** designation. Maintenance areas also have pollution controls imposed on them, but because the air quality is not as poor as in nonattainment areas, the control standards are not as strict in maintenance areas. All other areas not listed by the EPA for air quality degradation are considered **attainment areas**.

Sherman County is classified as an attainment area. In fact, Sherman County has the lowest total emissions of any county in Oregon. The most recent EPA air emission data available for the criteria pollutants is from 2001 and is provided for: carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOC), sulfur dioxide (SO₂), particulate matter (PM 10 and PM 2.5), and ammonia. In 2001, Sherman County's total emissions were 13,806 tons. Table 3-10 shows Sherman County's air emissions data for 2001 and how the county ranked, compared to other counties in Oregon (EPA, 2006).

According to the 2000 U.S. Census data, the economy of Sherman County is driven by agriculture. Sherman County has a total of 531,200 acres; 304,138 acres of this land is tillable. Barley, wheat, and cattle make up a large percentage of the agricultural base. A crop is raised only once every two years; land lies fallow during the off years. Beef cattle graze about 223,000 acres (Oregon Department of Environmental Quality and Oregon Department of Agriculture, 2006).

Pollutant	Amount of Emissions (in tons)	Rank Compared to Other Oregon Counties
Carbon Monoxide (CO)	7,259	Lowest in OR
Nitrogen Oxides (NOx)	1,434	3 rd lowest after adjacent Wheeler County and Wallowa County
Volatile Organic Compounds (VOCs)	813	Lowest in OR
Sulfur Dioxide (SO ₂)	109	Lowest in OR
Particulate Matter (PM 2.5)	837	Lowest in OR
Particulate Matter (PM 10)	3,064	Second lowest after adjacent Wheeler County
Ammonia	1,127	Average, near the median

Agriculture provides the economic base of not only Sherman County, but of the state of Oregon as well. Oregon's farmers and ranchers recognize the importance of being responsible environmental stewards to sustain the natural resource base (Oregon Department of Environmental Quality and Oregon Department of Agriculture, 2006). Environmentally, air pollution can: damage soils, water, crops, vegetation, manmade materials, property, animals and wildlife, impair visibility, affect climate and weather, and create transportation hazards (Washington State Department of Ecology, 2003). Large concentrated cattle/animal operations emit pollutants such as ammonia and methane and agricultural fields are a source of particulate matter. Evidence would suggest that these activities contribute significantly to Sherman County's total nonpoint emissions (Oregon Department of Environmental Quality and Oregon Department of Agriculture, 2006).

<u>Oregon is a member of AIRNow, a government-backed program which compiles</u> data and releases air quality forecasts. Specifically, through AIRNow, EPA, NOAA, the National Park Service, news media, and tribal, state, and local agencies work together to report conditions for ozone and particle pollution (AIRNow, 2006).</u>

<u>Oregon's Department of Environmental Quality (DEQ), in conjunction with AIRNow,</u> maintains the Air Quality Index (AQI) for Oregon. The AQI is a color-coded tool which broadcasts if air pollution levels are good (green), moderate (yellow), unhealthy for sensitive groups (orange), and unhealthy for all groups (red) (see Table 3-11).

Index Values	<u>Levels</u> <u>of Health</u> Concern	Cautionary Statements
<u>0-50</u>	Good	<u>None</u>
<u>51-100*</u>	<u>Moderate</u>	Unusually sensitive people should consider reducing prolonged or heavy exertion.
<u>101-150</u>	Unhealthy for Sensitive Groups	People with heart or lung disease, older adults, and children should reduce prolonged or heavy exertion.
<u>151-200</u>	<u>Unhealthy</u>	People with heart or lung disease, older adults, and children should avoid prolonged or heavy exertion. Everyone else should reduce prolonged or heavy exertion.
<u>201-300</u>	Very Unhealthy	People with heart or lung disease, older adults, and children should avoid all physical activity outdoors. Everyone else should avoid prolonged or heavy exertion.
<u>301-500</u>	<u>Hazardous</u>	People with heart or lung disease, older adults, and children should remain indoors and keep activity levels low. Everyone else should avoid all physical activity outdoors.

Table 3-11 Air Quality Index (AQI): Particle Pollution

*An AQI of 100 for particles up to 2.5 micrometers in diameter corresponds to a level of 40 micrograms per cubic meter (averaged over 24 hours). An AQI of 100 for particles up to 10 micrometers in diameter corresponds to a level of 150 micrograms per cubic meter (averaged over 24 hours) (Oregon Department of Environmental Quality, 2006b).

<u>There is an AQI monitoring station located in The Dalles, Oregon (about 25 miles</u> west of the proposed project site). Both 2005 and 2006 had approximately one month each worth of days where the air quality was measured at less than good (see Table 3-12).

Table 3-12 A	r Quality Index—Monitoring Data from The Dalles	, OR

Year	<u>Good</u>	Moderate	Unhealthy for Sensitive Groups	<u>Unhealthy</u>	<u>No AQI</u>
<u>2005</u>	<u>326 days</u>	<u>33 days</u>	<u>0</u>	<u>0</u>	<u>6 days</u>
<u>2004</u>	<u>199 days</u>	<u>21 days</u>	<u>1 day</u>	<u>0</u>	<u>145 days</u>

<u>For PM2.5, the 24-hour average National Ambient Air Quality Standard (NAAQS) is</u> 65 µg/m³. For PM10, the 24-hour average NAAQS is 150 µg/m³. Oregon adopted these same federal standards. Between 1992 and 2003, there were no days in The Dalles when PM2.5 exceeded the NAAQS (Oregon Department of Environmental Quality. 2006a).

In December 2005, the EPA Administrator signed proposed revisions to its national air quality standards for particulate matter. The proposal recommends lowering the level of the 24-hour PM2.5 NAAQS from the 65 µg/m³ to 35 µg/m³ and the 24-hour PM10 NAAQS from 150 µg/m³ to 70 µg/m³. The EPA must issue final standards by September 27, 2006, after considering comments received during the public comment period (US EPA, December 2005).

If the 24-hour NAAQS for PM2.5 and PM10 is lowered, some Pacific Northwest Counties may fall into nonattainment status. The following areas may be most susceptible to future NAAQS exceedences:

- 1. Population centers in valley bottoms with persistent fall and winter inversions;
- 2. Areas where wood burning is common for heating homes; and
- 3. <u>Areas with extensive, outdoor, agricultural and/or silvicultural burning during</u> inversion periods (Yakima Regional Clean Air Authority. 2006).

The proposed project area, and Sherman County as a whole, does not fall into these categories.

Chapter 4 - Environmental Consequences

In this Chapter:

- Specific impacts from BPA's alternatives
- Specific impacts from the proposed wind projects
- Proposed mitigation
- Cumulative impacts
- Comparison of alternatives

This chapter discusses the potential impacts of BPA's alternatives and the proposed wind projects on the environment. To analyze potential impacts from construction, operation and maintenance activities, resource specialists analyzed actions using a scale with four impact levels: **high**, **moderate**, **low** and **no** impact. Definitions of the impact levels vary for each resource. Most impact definitions are given in the first part of each resource discussion. The level of detail for each affected resource depends on the character of that resource, the importance of the issue, and the scale of analysis most relevant for the affected resource. Additional detail and maps can be found in appendices.

Specialists considered direct and indirect impacts in the short and long term. Direct impacts are caused by the action and occur at the same time and place. Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Impacts can be beneficial or adverse. The impact discussion lists *mitigation* that could reduce impacts.

This chapter also includes the potential *cumulative impacts* of the alternatives under each of the resources evaluated in this chapter. Cumulative impacts are the incremental effect of an action when added to other past, present, and reasonably foreseeable future actions. Foreseeable future actions can be undertaken by federal or non-federal entities. Cumulative impacts also can result from individually minor but collectively significant actions taking place over a period of time. The following describes the various actions considered in the cumulative impact analyses in this chapter.

Although much of the project vicinity has remained as undeveloped rangeland, agricultural and other rural development has occurred in the area in the past two centuries. Typical past development includes large grain farms, irrigated row crop farms, specialty crop enterprises such as orchards and vineyards, and small rural communities. Various types of roads and utility infrastructure also have been developed in the area. This type of development continues in present times and likely will continue into the future. A more recent type of development to occur in the area has been wind farms. Examples include the Klondike I and II wind farms, as well as the Condon wind farm.

Due to its rural nature, there is limited current or proposed future development activity in the general project area of the proposed projects. Typical activity includes

road construction, housing development, and some commercial and industrial expansion. However, most of the current or future development expected to occur involves wind farms that are already under construction, are approved but not yet constructed, or are proposed and currently undergoing some type of permitting process. Table 4-1 identifies these reasonably foreseeable future actions. Past experience with proposed wind projects has shown that it is likely that not all of these wind farms will ultimately be developed, but full development is nonetheless assumed for purposes of the cumulative impact analyses in this chapter.

No other major projects or actions are known to be underway or planned in Sherman, Wasco, Gilliam, and Klickitat (Washington) counties (Mcnab, 2006b; Baird, 2006; Anderson, 2006; Dreyer, 2006; Deal, 2006).

In Morrow County, Oregon, proposed development other than wind farms includes a 1,500-acre NASCAR facility proposed for north-central Morrow County near Tower Road; a new potato processing facility; a 120-acre methane digester to burn methane and produce 10 MW of electricity; and two new ethanol plants (McLane, 2006).

Wind Projects				
Regional Projects	MW	Oregon County (unless noted)		
Seven Mile Hill	70	Wasco		
Windy Point	250	Klickitat, Washington		
Klondike I	24	Sherman		
Klondike II	75	Sherman		
Klondike III	300	Sherman		
Biglow Canyon	400	Sherman		
Oregon Trail	15	Sherman		
Goodnoe Hills	150	Klickitat, Washington		
Big Horn	200	Klickitat, Washington		
White Creek	200	Klickitat, Washington		
Condon	50	Gilliam		
Leaning Juniper	200	Gilliam		
Arlington CEP	100	Gilliam		
Orion South	200	Sherman		
Shepherds Flat	750	Gilliam and Morrow		
Willow Creek	150	Gilliam and Morrow		
Total	3,134			

Table 4-1 Existing, Planned and Reasonably Foreseeable Wind Projects in the Project Vicinity

4.1 Land Use

4.1.1 Impact Levels

Impacts would be considered high where actions would:

- Involve acquisition of new land or land easements for facilities that would preclude existing or planned use of land in an area not previously directly affected by the presence of utility facilities.
- Convert active and productive farmlands to a non-farm land use in excess of 3 percent of agricultural land in the county.
- Displace residents by causing in excess of five homes to be removed.

Impacts would be considered moderate where actions would:

- Involve acquisition of new land or land easements for facilities that would preclude existing or planned use of land in an area already affected by the presence of utility facilities.
- Adversely affect existing farmlands from 2 to 3 percent of agricultural lands county-wide.
- Displace some households (five or less) and residents who choose to move because of land use changes.

Impacts would be considered **low** where actions would:

- Involve acquisition of new land or land easements for utility facilities that would result in an adjustment of established or planned use of land.
- Convert active and productive farmlands to non-farm use in less than 1 percent of the agricultural lands within the county.
- Create short-term disturbances (such as crop damage during construction), but still allow the continued use of the land according to existing farm practices.
- Displace no residents.

No impact would occur when land uses would not change.

4.1.2 BPA Proposed Action

4.1.2.1 Impacts

The Proposed Action would be located entirely within land zoned F-1 (Exclusive Farm Use). BPA would acquire 125-foot wide easements to build, operate and maintain the transmission line from the proposed John Day 230-kV Substation to PPM's existing Klondike Schoolhouse Substation. BPA would purchase 15 acres in fee for the proposed John Day 230-kV Substation. BPA would also purchase easements for access roads.

Permanent Impacts

The proposed transmission line is about 12 miles long. Transmission line towers would be placed about 900 feet apart, requiring about 71 towers (61 steel tubes, 10 steel lattice). Each steel tube tower would require 225 square feet (15 feet by 15 feet) while each lattice tower would require about 5,000 square feet (about 70 feet by 70 feet) of land per tower. Because steel lattice towers require more land, their use would have a greater adverse impact to farming practices. They are also more expensive to construct. As a result, steel tube towers would be used wherever possible. Steel lattice towers would only be used for angle points or dead ends.

All rock and soil materials used for excavating the area for footings would be later used to backfill the excavated area once the footings are installed. Land within the 125foot wide easement unaffected by constructing the towers and substation would remain open and available for farming. No residences would be removed or permanently affected by the Proposed Action. Wherever feasible, the transmission lines would be placed along the margins of cultivated areas to reduce the potential for conflict with farm operations. Overall, the towers would permanently affect about 1.5 acres.

Expansion of the John Day Substation would permanently affect about 0.1 acre of land classified as F-1 farmland. This land is not being farmed. The proposed 230-kV John Day Substation would require about 15 acres of F-1 farmland (see Table 4-2).

Type of Disturbance	BPA Proposed Action	BPA Middle Alternative	BPA No Action Alternative	Klondike III Wind Project	Biglow Canyon Wind Farm
Temporary Impacts (acres)					
Roads/Staging	51.00	52.0	0.00	240.21	<u>112.78</u>
Towers/Turbines	65.19	67.95	0.00	46.90	274.47
Substations/O&M Facilities	0.00	0.00	0.00	8.00	6.00
Total	116.19	119.95	0.00	<u>295.1</u>	3 <u>93.25</u>
Permanent Impacts (acres)					
Roads/Staging	0.00	0.00	0.00	<u>43.1</u>	151.99
Towers/Turbines	1.46	1.53	0.00	<u>12.0</u>	14.58
Substations/O&M Facilities	15.10	15.10	0.00	<u>19.7</u>	<u>11.11</u>
Total	16.56	16.63	0.00	<u>74.8</u>	<u>177.68</u>

Table 4-2 Land Use Impacts

No permanent roads would be constructed as part of the Proposed Action.

During the life of the proposed project, BPA would perform routine, periodic maintenance and emergency repairs to the transmission line. Little vegetation maintenance is anticipated because the analysis area is mostly farmed. If necessary, BPA would coordinate with local farmers to reduce the risk of impacts to farming practices along its transmission rights-of-way prior to any vegetation maintenance. Vegetation maintenance is described in Section 2.1.13, Maintenance.

Permanent impacts to land use from the Proposed Action would total about 16.6 acres. This would be a low impact because total acreage taken out of production would account for less than 1 percent of total farmland within Sherman County.

Temporary Impacts

Temporary construction-related impacts would include disturbance to areas surrounding tower and substation construction sites and temporary road construction.

Constructing each tower would disturb an area about 40,000 square feet (200 feet by 200 feet), temporarily affecting about 65.2 acres. This land would be restored to preproject conditions when construction is completed.

BPA would use the existing road system as much as possible for construction, although temporary access would be necessary for construction at each tower site. Most of the access roads would be within the transmission line ROW. About 50.7 acres would be temporarily disturbed for construction of temporary roads and a staging area (about 10 acres). The location for the staging area would be determined prior to construction and it would likely be located next to a highway or main road, and would only be used prior to and during construction. If construction were to occur during the dry season, little or no gravel would be required for temporary roads would be removed after construction. Ground disturbed for temporary roads would be restored to its preconstruction condition after construction is completed.

If crop damage were to occur during construction or during periodic maintenance, landowners would be compensated for damaged or lost crops. Access road locations would be coordinated with landowners and ODOT or Sherman County (depending on the road) to the extent practicable, to minimize impacts on traffic, property and existing uses.

In the short term, farm revenues could be adversely affected to the extent that disruptions could cause delays in harvesting, more time needed to move equipment, and interruptions to harvesting patterns. These impacts would be temporary and farmers would be compensated for the loss of revenue from land affected by construction.

Overall, temporary land use impacts from the Proposed Action would total about 116 acres and represent a low impact.

4.1.2.2 Mitigation Measures

BPA would compensate landowners through perpetual easements for the transmission line ROW and access roads, and purchase the land in fee for the substation site. BPA would compensate landowners for any crop damage that occurs during construction, and operation and maintenance.

4.1.3 BPA Middle Alternative

4.1.3.1 Impacts

The Middle Alternative would be about 12.5 miles long and except for the different route, would have similar components to the Proposed Action and similar impacts.

Permanent Impacts

As with the Proposed Action, the Middle Alternative would be entirely located on land zoned F-1 (Exclusive Farm Use) (EFU) and would require a 125-foot wide easement. Transmission line towers would be placed about 1,000 feet apart, which would require about 74 towers (64 steel tube, 10 steel lattice). Overall, construction of the transmission line would permanently affect about 1.5 acres, similar to the Proposed Action. Unlike the Proposed Action, the Middle Alternative would cross some fields and could affect harvesting patterns around the towers, although land within the 125-foot wide easement unaffected by constructing the towers and substations would remain open for farming. No residences would be removed or permanently affected by the Middle Alternative. Wherever feasible, the transmission lines would be placed along the margins of cultivated areas to reduce the potential for conflict with farm operations. Expansion of the John Day Substation would affect about 0.30 acre of F-1 farmland, though this land is not now being farmed. The proposed 230-kV John Day Substation would require about 10 acres of F-1 farmland. The substations would permanently affect about 15 acres, the same as the Proposed Action.

Similar to the Proposed Action, no permanent roads would be constructed.

Permanent impacts to land use from the Middle Alternative would total about 16.6 acres, similar to the Proposed Action. This would be a low impact because total acreage taken out of production would account for less than 1 percent of total farmland within Sherman County.

Temporary Impacts

Constructing each tower would disturb an area about 40,000 square feet (200 feet by 200 feet), temporarily affecting about 68 acres, although this land would be restored to pre-project conditions when construction is completed.

BPA would use the existing road system as much as possible for construction, although temporary access would be necessary for construction at each tower site. About 120 acres of land would be temporarily disturbed for construction of temporary

roads and staging areas. As with the Proposed Action, temporary construction-related impacts would include a 10-acre staging area needed for transmission line construction and the stockpiling of materials.

As with the Proposed Action, adverse short-term impacts to farm revenues could occur to the extent that disruptions could cause delays in harvesting, more time could be needed to move equipment and could cause temporary interruptions to harvesting patterns. These impacts would be temporary and farmers would be compensated for the loss of revenue from land affected by construction.

Overall, temporary land use impacts from the Middle Alternative would total about 120 acres, slightly more than the Proposed Action, and represent a low impact.

4.1.3.2 Mitigation Measures

BPA would compensate landowners through perpetual easements for the transmission line ROW and access roads, and purchase the land in fee for the substation site. BPA would compensate landowners for any crop damage that occurs during construction, and operation and maintenance.

4.1.4 BPA No Action Alternative

The No Action Alternative would have no impact to land use because no new substation, substation expansion or transmission line would be constructed. Existing land uses would remain the same as today.

4.1.5 Klondike III Wind Project

4.1.5.1 Impacts

Permanent Impacts

Permanent land use impacts would consist of replacing farmed land with the utility use (including roads to access the turbine strings) and forced changes in harvesting patterns to avoid the turbine strings. If the turbine strings are long and would bisect a parcel, they would convert the site into two parcels for farming practices, primarily for moving and manipulating equipment and vehicles to, across, and around the property. The project would require about <u>62</u> acres of land to be permanently removed from farm use (see Table 4-2). About 129,000 acres are farmed within Sherman County area, so the amount permanently removed from production would be less than 0.1 percent. Permanent impacts from the Klondike III Wind Project would have a low impact to land use.

Temporary Impacts

Temporary impacts would consist of delays in access to roads or property by construction traffic and temporary displacement of crops by construction activities. Several local roads currently used by farm owners or operators would be improved, which would cause temporary delays, but when completed would improve the functionality of the roads for transporting farm equipment and vehicles. Roadway improvement would be completed on Gosson, Sandon, Smith, and local roads within the analysis area. Construction-related delays could occur on Emigrant Springs, Rayburn, Webfoot, McDonald Ferry, and Dehler roads. The proposed facility would slightly increase traffic volumes from trips by operational staff, but would not cause a reduction in LOS, therefore no effect would occur. About <u>250</u> acres of farmland would be temporarily affected by construction, a low impact (DEA 2005) (see Table 4-2).

4.1.5.2 Mitigation Measures

PPM Energy would compensate affected landowners through long-term leases for construction and operation of the wind power facilities.

4.1.6 Biglow Canyon Wind Farm

4.1.6.1 Impacts

Permanent Impacts

The project would be co-located and compatible with existing and ongoing agricultural activities. The land adjacent to the sites where the turbines, access roads, and construction areas would be located is devoted to the production of wheat and barley crops. Although the presence of the turbine pads and turbines would have an impact on the use of adjacent land, the Biglow Canyon Wind Farm would not seriously interfere with farm practices. The proposed facility would be located on land tracts where its footprint is small in comparison to the total farmed acreage in the tract and thus there is negligible likelihood that the facility would change the pattern of land use by causing certain tracts to go out of farm use. The Biglow Canyon Wind Farm would have a low impact to farm uses. Where necessary, roads would be improved to accommodate construction equipment. Permanent road improvements would benefit the local transportation system.

The project would require that about <u>157</u> acres be permanently removed from farm use (CH2MHill, 2005). This would account for less than 0.1 percent of existing acreage in barley and wheat production. The Biglow Canyon Wind Farm would have a low impact to land uses.

Temporary Impacts

Temporary construction-related impacts would be similar to those described for Klondike III, but would affect about <u>388</u> acres. Temporary impacts would be low.

4.1.6.2 Mitigation Measures

<u>PGE</u> would compensate affected landowners through long-term leases for construction and operation of the wind power facilities.

4.1.7 Cumulative Impacts

Although potential land use impacts from BPA's Proposed Action and the wind projects would be low, these impacts would contribute incrementally to land use impacts that are already occurring due to present development and activities in the project vicinity, combined with impacts that could occur from the reasonably foreseeable future developments planned in the vicinity. BPA's Proposed Action and the wind projects would contribute to the cumulative conversion of undeveloped land to developed land in the area. Given the relatively small number of current and proposed cumulative projects that are dispersed over a large area, these projects are not expected to result in a significant change in land use in the area.

Most of the land in the project vicinity is zoned for agricultural use. Changes in the types of agricultural use would not create cumulative impacts to land use, but changes from agricultural to nonagricultural uses would take agricultural land out of production. The limited development that is expected in the project vicinity in the near future would not likely create negative cumulative impacts due to the large amount of agricultural land in the area.

Although the current and reasonably foreseeable cumulative wind projects in the project vicinity could convert agricultural land to non-agricultural uses, cumulative land use impacts from these projects would likely be low, because such projects typically do not require a large amount of farm land and allow farming activities to continue. Cumulative impacts would only be expected if nonagricultural development occurred rapidly over the next several years.

4.2 Transportation Facilities

4.2.1 Impact Levels

Impacts would be considered high where actions would:

- Preclude future expansion or realignment of the local transportation system.
- Cause permanent traffic increases, or disruption or rerouting of a transportation facility such that major transportation system upgrades would be required.

Impacts would be considered moderate where actions would:

• Create long-term disruption of traffic, or increases in traffic such that existing systems would need to be upgraded.

• Create short-term traffic disruptions so that the existing transportation systems could not carry the increased traffic and traffic flow is delayed.

Impacts would be considered low where actions would:

• Create short-term traffic disruptions where existing transportation systems could carry the increased traffic temporarily.

No impact would occur if the new facilities would be placed a sufficient distance from the transportation system so that future planned expansion would not be affected, no transportation system upgrades would be required, and any increases in traffic and/or traffic disruptions are short-term and temporary.

4.2.2 BPA Proposed Action

4.2.2.1 Impacts

The BPA Proposed Action would have no long-term impact to the local or regional transportation system. No transmission or substation facilities (including the future substation) would be placed within existing road rights-of-way. Construction equipment and supply vehicles would use the existing state highway system and county roads to reach the construction area. While portions of the transmission line would be next to North Klondike and Herrin roads, the transmission line would be outside of existing road ROW and would not hinder any future expansion of the road. As with the wind projects, some road improvements may be necessary to accommodate construction-related equipment or to repair sections of road damaged by heavy equipment and construction-related traffic. During construction, temporary, short-term disruption to traffic could occur, although the level of the impact is anticipated to be low because of existing low traffic volumes within the analysis area. Disruption of existing traffic patterns would likely be caused by construction traffic entering and leaving county roads to access construction areas.

All project construction would occur on BPA-owned property for the substations or on private property with ROW easements for the proposed transmission line. During operation, the Proposed Action would not increase existing traffic levels because no additional staff is anticipated to be needed to maintain the new transmission line, substations or expansion of the existing John Day Substation.

BPA would use the existing road system as much as possible for construction, although temporary access from the existing road system to the construction site would be needed to construct each structure located within the proposed easement for the transmission lines. Access roads from county roads to construction areas would be about 14 feet wide, would be temporary, and would be removed after construction. If construction were scheduled during the dry season, little or no rock would be necessary for temporary access roads.

Ground disturbed for temporary roads would be restored to its pre-construction condition after the transmission line is built. If crop damage were to occur or farmland

be removed from production during construction or maintenance, landowners would be compensated for lost revenue. Access roads, where needed, would be constructed in locations with the most direct route and shortest distance from the public ROW to the construction site to minimize impacts to farmland. Temporary road construction would be coordinated with landowners, to the extent practical, to minimize impacts on property.

4.2.2.2 Mitigation Measures

When construction of the transmission line and substations is completed, the contractor responsible for construction would remove temporary access roads and staging areas used to access tower construction sites. The contractor would rehabilitate areas temporarily affected by construction to pre-construction conditions.

Roadways used for transporting equipment and materials to the project site would be inspected by Sherman County and BPA prior to beginning construction, to identify any potential safety concerns, such as large potholes or inadequate pavement conditions. During construction, transport routes would be periodically inspected by the County and BPA to determine if construction-related traffic is having an adverse impact on the roadway.

4.2.3 Middle Alternative

4.2.3.1 Impacts

The Middle Alternative would have similar impacts to the state and county road system as the Proposed Action.

4.2.3.2 Mitigation Measures

Mitigation measures would be the same as for the Proposed Action.

4.2.4 BPA No Action Alternative

Under the No Action Alternative, no impacts to the transportation system would occur and road improvements proposed by the wind power projects would not be completed. Roads would remain as they are today.

4.2.5 Klondike III Wind Project

4.2.5.1 Impacts

The proposed Klondike III Wind Project would be constructed on private property and would not interfere with any future improvement to the local transportation system.

Traffic related to the operation of the proposed Klondike III Wind Project would have little impact to the existing or projected LOS on the state highway or local transportation

system. All transportation routes within the County are projected to operate with LOS A or B in 2019 (TSP planning horizon, see Section 3.2, Transportation) even during summer when traffic volumes are highest. Given that 15 to 20 employees would work at the facility, the increase in the number of trips on the road system would be minimal and would not affect the operation of the roadway system (DEA, 2005).

Construction-related traffic is anticipated to take I-84 to US 97 (at Biggs Junction) to the US 97/OR 206, then OR 206 to Wasco. Construction traffic could also approach the site from the south on US 97. Both US 97 and OR 206 are two-lane paved highways with poor to fair pavement condition. From Wasco, construction-related traffic would use a series of county roads to access private land where the construction staging areas and turbine strings would be located. Local roads are generally gravel rural roadways with little traffic other than local residential and farm traffic. Local roads that would be used include: Wasco Lane, North Klondike Road, Emigrant Springs Road, Rayburn Road, Dehler Lane, Dormaier Road, McDonald Ferry Lane, Gosson Lane, Egypt Road, and Smith Road. An unnamed road connecting Gosson Lane and Dormaier Road would also be used.

No physical impact is anticipated to occur on highways (I-84, US 97, and OR 206) because all are constructed to accommodate the heavy loads of trucks (estimated at up to 80,000 lbs) that would deliver the turbine components and other construction materials. Some of the local roadways would require improvements, which would generally be a 6-inch gravel layer placed on top of the existing road prior to project construction to accommodate the length and weight of vehicles that would deliver the turbine pieces and machinery necessary for construction. Large sections of local roads in poor condition would be completely reconstructed. Reconstructed roadways would be improved to accommodate two 8-foot travel lanes and would be constructed with 8 inches of crushed aggregate on top of a geotextile separation fabric (DEA, 2005). All improvements on local roads would be constructed within the public right-of-way. During roadway improvements would have a beneficial impact to the Sherman County Road Maintenance Department because it would not have to pay for the improved roads, although long-term maintenance would still be the County's responsibility.

Construction-related traffic could have a low impact by causing short-term traffic delays when trucks deliver construction-related equipment and the turbines, but those delays would be temporary and are not anticipated to have an adverse impact on highways in the analysis area. Construction-related traffic delays on local roadways could occur but are anticipated to be limited due to low use of these local roadways. Several local roadways would be improved or completely reconstructed to accommodate construction-related traffic. Many of the existing local roads are in poor condition; the proposed improvements would have a beneficial long-term impact by improving the quality of the road for all users.

4.2.5.2 Mitigation Measures

When construction of the project facilities is completed, the contractor(s) responsible for construction would remove temporary access roads and staging/laydown areas used to access construction sites. The contractor(s) would rehabilitate areas temporarily affected by construction to pre-construction conditions.

Roadways used for transporting equipment and materials to the project site would be inspected by Sherman County and PPM Energy prior to beginning construction, to identify any potential safety concerns, such as large potholes or inadequate pavement conditions. During construction, transport routes would be periodically inspected by the County and PPM Energy to determine if construction-related traffic is having an adverse impact on the roadways. If inspections indicate damage from construction-related traffic, PPM Energy would be responsible for making the necessary improvements.

4.2.6 Biglow Canyon Wind Farm

4.2.6.1 Impacts

The proposed Biglow Canyon Wind Farm would be constructed on private property and would not interfere with any future improvement to the local transportation system.

As with the proposed Klondike III Wind Project, traffic related to the operation of the proposed Biglow Canyon Wind Farm would have no impact to the existing or projected LOS on the state highway or local transportation system. All transportation routes within the county currently operate at LOS A or B and are projected to maintain that high level of service, even during the summer. Given that only 15 to 20 employees would work at the facility, the increase in the number of trips on the road system would be minimal and would not affect the LOS of the roadway system (CH2MHill, 2005).

The primary route for construction-related traffic would carry the majority of heavyduty and light-duty delivery vehicles as well as workforce traffic. The route would begin from either eastbound or westbound I-84, and continue south on US 97 (from Biggs Junction) to Wasco. From Wasco, construction-related traffic would travel east and then southeast on OR 206 before heading due east on either Klondike Road or Hilderbrand Lane. Vehicles would then progress north on North Klondike Road to various county roads to access individual turbine string roads. County roads used for construction access would include sections of Medler Lane, Emigrant Springs Road, Oehman Road, Biglow Road, Beacon Road, and Herrin Lane. It is assumed that all improvements on local roads would be constructed within the public right-of-way.

No physical impact is anticipated to occur to the state highway system. As with Klondike III, county and local roadways would likely require some improvement before construction would begin, including regrading and in some cases reconstructing county roadways to accommodate construction and delivery equipment (CH2MHill, 2005). During any roadway improvements or reconstruction, some short-term delays would likely occur. Any road improvements would be a beneficial impact to the County as

improvements would remain in place after construction, though maintenance of the road would still be the County's responsibility.

Construction-related traffic would have a temporary low level of impact to state and county roadways from traffic increases as construction vehicles access the site. Because of the rural nature of the area, roadways currently accommodate very few trips and all routes in the county operate at LOS A. Additional construction traffic would temporarily increase the volume of vehicles on the roadway, but not to the point where traffic flow would be delayed.

4.2.6.2 Mitigation Measures

After construction of the project facilities, the contractor(s) responsible for construction would remove temporary access roads and staging/laydown areas used to access construction sites. The contractor(s) would rehabilitate areas temporarily affected by construction to pre-construction conditions.

Roadways used for transporting equipment and materials to the project site would be inspected by Sherman County and <u>PGE</u> prior to beginning construction, to identify any potential safety concerns, such as large potholes or inadequate pavement conditions. During construction, transport routes would be periodically inspected by the County and <u>PGE</u> to determine if construction-related traffic is having and adverse impact on the roadway. If inspections indicate damage from construction-related traffic, <u>PGE</u> would be responsible for making the necessary improvements.

4.2.7 Cumulative Impacts

Construction, operations and maintenance of the proposed transmission facilities and wind projects and the projects listed in Table 4-1 have had or are expected to have a low impact on regional and local roads. The Biglow Canyon Wind Farm and Klondike Wind Project Phases I, II, and III) would employ 40 to 50 (15 to 20 people each at Biglow Canyon Wind Farm and Klondike III Wind Project, eight to 10 at Klondike I and II), generating about 100 daily trips on local county roads. Other wind projects would also add a small number of trips from employees, but given the small amount of existing and projected traffic in the county, additional trips generated by staff of all proposed projects would not negatively affect the LOS of existing roads in Sherman County.

A short-term cumulative impact could potentially occur if several projects were constructed at the same time. Truck traffic could increase on highways, but capacity along local and state roads would be adequate to accommodate the increased trips, and it is unlikely levels of safety or service on any major highways would be affected. Some short-term traffic delays could occur. No delays are anticipated after construction.

Construction of the proposed Klondike III and Biglow Canyon wind projects would have a cumulative beneficial impact to the local transportation system. Prior to constructing the facilities, several roads would need to be improved to accommodate construction vehicles for both projects. Road improvements would remain in place after wind power facilities are completed that would be used by local residents, and for moving farm equipment. Improving these roads would be a beneficial impact to Sherman County because the cost of roadway improvements would be paid for by the wind power facilities and improvements would remain in place after construction.

4.3 Recreation

4.3.1 Impact Levels

Impacts would be considered high where actions would:

- Preclude existing or planned *dispersed recreational* uses after construction;
- Alter or eliminate dedicated recreational activities after construction;
- Permanently negatively affect the recreational experience, of either a dedicated or dispersed recreational use, e.g., if a facility next to a hiking trail changed the rural hiking experience, or lights from wind turbines obliterated the night sky for astronomy clubs.

Impacts would be considered moderate where actions would:

- Temporarily preclude or limit dispersed or dedicated recreational uses during peak-use periods during construction;
- Temporarily affect the recreational experience, of either a dedicated or dispersed recreational use during peak-use periods, e.g., if a facility next to a hiking trail changed the rural hiking experience.

Impacts would be considered **low** where actions would:

- Temporarily preclude or limit dispersed or dedicated recreational uses during offpeak use during construction;
- Require minor relocation of dispersed recreational activities to an equal or better location after construction.
- Temporarily affect the recreational experience during off-peak use, of either a dedicated or dispersed recreational use, e.g., if a facility next to a hiking trail changed the rural hiking experience.

No impact would occur to recreation areas if there were no effect on the location or experience of recreational uses during or after construction.

4.3.2 BPA Action Alternatives, Klondike III Wind Project, and Biglow Canyon Wind Farm

4.3.2.1 Impacts

None of the recreational facilities described in Section 3.3 would be removed or relocated and no recreational activities would be precluded as a result of the proposed project. Likewise, there would be no impact to hunting on private land. However, visual impacts to recreational resources could occur, particularly in areas where the landscape is relatively flat and views are unobstructed by trees or natural features. Impacts to visual resources are also addressed in Section 4.8, Visual Resources.

Temporary, construction-related impacts such as short-term traffic delays on US 97 and local roads could affect access to recreational opportunities, although impacts to recreational uses are expected to be low because motorists could use existing passing lanes on US 97 to pass large, slower moving construction-related equipment. Shortterm traffic delays would have no impact on the availability of recreation amenities. Local road improvements (see Section 4.2, Transportation Facilities) would enhance portions of the access route to the John Day River via McDonald Ferry Lane, and thus have some positive impact on ability to access the river. Visitor interest in the proposed wind farms could augment visits to existing recreational opportunities.

John Day River

The BLM manages the John Day River Corridor. BPA's action alternatives would be constructed on private land and BPA land (substation) and would not be under BLM jurisdiction. There would be no direct loss of recreational opportunity. Impacts to the John Day River would occur in isolated areas (up to about river mile 17) where turbines would be visible. BLM classifies all wild and scenic river segments as VRM Class II in which "management activities resulting in changes to the existing character of the landscape may be allowed, provided they do not attract the attention of the casual observer." Generally, where views would be altered, it would occur in limited areas and would have little effect on recreation activities. Few turbines or turbine blades would be visible from any single location. To the extent the turbines would be visible, they would be subordinate in view because portions of views of the John Day Canyon are already obstructed by existing transmission lines (DEA, 2006c; CH2MHill, 2005). The slight modification of views from the John Day River corridor would have no impact on the recreational experience in that area.

Above the river, portions of the proposed wind projects would be visible from some locations along the upper portions of the canyon walls. Because recreation access to the rim and canyon walls is very limited, towers would have no impact on the recreational experience.

Journey Through Time Scenic Byway

There would be no direct loss of recreational opportunity as a result of the proposed transmission line and wind projects. Temporary, construction-related impacts could occur to the Byway from increased traffic, but they would be of limited duration.

While portions of the proposed wind projects and transmission line would be visible from the Journey Through Time Scenic Byway, the proposed project would be compatible with the goals stated in the Journey Through Time Management Plans because it would do the following: 1) create jobs, 2) maintain rural lifestyles, 3) protect important values (i.e., historical attractions and artifacts), and 4) build identity for the North Central Region of Oregon (DEA, 2005). There are no scenic overlooks or vista points along the segment of highway near the proposed projects. BPA's action alternatives would have no impact because their effects do not meet the criteria for high, moderate, or low impacts, although turbines and transmission lines would be intermittently visible from the Byway. The action alternatives would not preclude the use of the road as a recreational amenity. The alternatives would also only be visible in limited areas because existing topography would screen much of the proposed project. Views of the turbine strings could have a beneficial recreation impact by attracting motorists to view the area.

Historic Oregon Trail and Barlow Road Cutoff Trail Alignments

The proposed transmission line, substations and wind projects would not be visible from the BLM Oregon Trail Interpretive Site near McDonald Ferry so there would be no visual impact to that recreational site. The project would be visible from many points along the historic Oregon Trail alignment, but not from known, accessible, intact segments.

There would be no direct or indirect loss of a recreational opportunity related to the Oregon Trail as a result of the proposed projects. All development would occur on private property on which no intact trail segments have been identified. Further, the project would not affect existing locations where the historic trail alignments cross county roads, nor would turbines be constructed over the historic alignments. Access roads would cross the historic alignments in a few locations, but would not impact intact segments because none exist at the proposed access road crossings.

4.3.2.2 Mitigation Measures

Because there are no identified recreational resources directly affected, no mitigation measures are proposed. Impacts related to visual resources of the proposed projects are described in Section 4.8.

4.3.3 BPA No Action Alternative

Under the No Action Alternative, no new substation, substation expansion or transmission line would be constructed; therefore, no impacts to recreation would occur.

4.3.4 Cumulative Impacts

Cumulative impacts to recreational resources would be primarily visual impacts and are addressed in Section 4.8.8. None of the cumulative projects are known to be proposed within identified recreational areas or resources in the project vicinity, so direct loss of recreational opportunities is not expected. It is expected that the cumulative effects to the dispersed recreation that occurs in the area such as hunting, fishing, etc., would be low because this type of recreation could continue after development.

4.4 Geology and Soils

4.4.1 Impact Levels

Impacts would be considered high where actions would:

- Require road or facility construction or clearing on sites that are prone to mass movement or have very high susceptibility to erosion.
- Occur on soils with soil properties so unfavorable or difficult that standard mitigation measures, including revegetation, would be ineffective.
- Cause long-term impacts from accelerated erosion, sedimentation, or disruption of unstable soils.

Impacts would be considered **moderate** where actions would:

• Create impacts that are primarily short term, with an increase in normal erosion rates for a few years following soil disturbance until erosion and drainage controls become effective.

Impacts would be considered **low** where actions would:

- Require road and facility construction on soils with low to moderate erosion hazard, and where the potential for successful mitigation would be good using standard erosion and runoff control practices.
- Occur where erosion levels could be held near normal during and following construction.

No impact would occur where soils remain unchanged and no erosion occurs.

4.4.2 BPA Action Alternatives

4.4.2.1 Impacts

Soils and geologic conditions are similar for the Proposed Action and Middle Alternative.

Geologic conditions along the proposed routes and at the proposed substation and substation expansion are relatively stable and suitable for the proposed activities. The

alternatives would not affect geologic conditions and would have the same potential for exposure to geological hazards. Exposure would be low to none.

Most of the project site consists of agricultural fields where bare soils are often exposed to wind and water. Based on the soil types present, soil erosion potential ranges from highly erodible to not highly erodible (MacDonald et al., 1999). However, because the project would not appreciably increase the amount of exposed soils, impacts would be low. The land along the proposed routes is primarily plowed cropland, and to a lesser extent, other vegetation.

Permanent impacts would involve the removal of soil from about 16.6 acres of land for the Proposed Action and a similar amount for the Middle Alternative. Because the soil types to be removed are common throughout the analysis area, the removal of this small area of soil would be a low impact for either alternative.

Temporary impacts would include disturbance of about 116 acres of soil for the Proposed Action and about 120 acres of soil for the Middle Alternative. Temporary soil disturbance would occur during construction of the transmission towers, staging area, temporary access roads, and substation construction. Establishing the staging area would involve stripping and temporarily stockpiling the topsoil before placing gravel on the laydown areas. BPA would try to minimize the need for such disturbance by finding areas already graveled or paved if possible. Because stockpiling would occur during the time of year when rainfall is lowest, very little erosion would result from precipitation. After the staging area is no longer needed, the site would be brought back to its original contours, topsoil would be spread on the site, and normal cropping or revegetation would occur.

While the project would use existing roads to the extent practical, temporary access roads would be needed. These roads would be 14 feet wide. Specific locations of temporary access roads have not been determined and would be coordinated with landowners to minimize impacts. As needed, water trucks would be used to keep wind erosion losses to a minimum. Any disturbed CRP and other non-cropped vegetated areas would be **revegetated** with appropriate species. Construction would require the use of heavy equipment and haul trucks to deliver aggregate, water, and other materials. The repeated traffic of heavy machinery could cause localized soil compaction. To minimize compaction, truck traffic would be limited to designated existing and improved road surfaces, whenever feasible. Any compacted soils outside of the permanent project footprint would be restored.

Erosion control **best management practices** (BMPs) would be used to manage wind and water erosion. Areas of temporary disturbance would be revegetated as appropriate. The BPA action alternatives would result in a low impact to soils because erosion control measures are expected to keep erosion levels near normal during and after construction.

Overall temporary impacts to soils would be similar to impacts resulting from existing farm uses (e.g., regular disturbance from crop production). All soils temporarily disturbed by construction would be returned to pre-construction contours and condition. Therefore, temporary impacts to soils are expected to be low.

4.4.2.2 Mitigation Measures

Because impacts would be low and appropriate erosion control measures are included in the Proposed Action, additional mitigation measures are not proposed.

4.4.3 Klondike III and Biglow Canyon Wind Projects

4.4.3.1 Impacts

Geologic and soil conditions are similar to those described for the BPA action alternatives. Permanent impacts would include removing soil from about <u>219</u> acres of land (about <u>62</u> acres from Klondike III and about <u>157</u> acres from Biglow Canyon). The potential for exposure to geological hazards would be low. Topsoil removed for construction of project facilities would likely be applied to surrounding agricultural fields. Because the soil types to be removed are common throughout the project area, the removal of this small area of soil would be a low impact.

Temporary impacts would result from activities such as road construction (with associated underground collector system) and turbine pad construction, which may require the removal of surface vegetation, and expose soils. Turbine pad areas would be covered with non-erosive material, such as gravel or concrete, immediately following exposure, thereby limiting the time for wind or water erosion to soils stockpiled from turbine pad excavation.

Temporary impacts would occur with creation of staging areas and excavation for underground collector cables not associated with roads. Staging areas would be constructed in a similar fashion as for the BPA action alternatives. BMPs would be used to minimize the impacts of wind erosion. In actively cropped areas, the wheat crop would protect the stockpiles from wind erosion. In other areas, hay bales or others similar containment would be provided. As needed, water trucks would be used to keep wind erosion losses to a minimum. After construction, the staging areas would no longer be needed, the sites would be brought back to their original contours, topsoil would be spread on the site, and normal cropping or revegetation would occur. Any disturbed CRP areas and other non-cropped vegetated areas would be revegetated with the appropriate species. In addition to revegetation, BMPs would likely include the use of silt fences, straw bales, watering, check dams, and other similar erosion control methods.

Construction would require the use of heavy equipment and haul trucks to deliver aggregate, cement, water, and other materials. The repeated traffic of heavy machinery could cause localized soil compaction. To minimize compaction, truck traffic would be limited to designated existing and improved road surfaces, whenever feasible. Any compacted soils outside of the permanent project footprint would be restored.

No soil impacts would be expected from chemicals during construction, operation, or retirement. There would be minimal amounts of chemicals used at the facility sites such as lubricating oils and cleaners for the turbines and pesticides for weed control. Chemicals would be stored on site according to all applicable requirements and

regulations to limit the risk of adverse effects. The risk of a chemical spill is negligible, and the impacts of any such spill would be limited due to the small amounts of chemicals that would be transported to the facility sites.

Temporary impacts would disturb about <u>683</u> acres (about <u>295</u> acres from Klondike III and about <u>388</u> acres from Biglow Canyon).

4.4.3.2 Mitigation Measures

Construction of all features of the project would be in compliance with an erosion control plan and National Pollutant Discharge Elimination System (NPDES) 1200-C construction permit that would require BMPs to minimize possible impacts from erosion. Erosion control measures that would be installed during work on the access roads, staging areas, and turbine sites would include the following:

- Not removing vegetation unless absolutely necessary and not removing existing vegetation any sooner than would be absolutely necessary.
- Maintaining vegetative buffer strips between the areas impacted by construction activities and any receiving waters.
- Installing sediment fence/straw bale barriers to filter sediments prior to reaching adjacent resources.
- Surfacing the areas with gravel or other non-erodible surface as quickly as possible.
- Planting designated seed mixes at impacted areas adjacent to the roads.
- Watering roads and exposed soils in dry weather when wind exposure may cause erosion.

All non-agricultural areas that are impacted by the construction would be seeded when there would be adequate soil moisture. Sediment fences, straw bale barriers, and other erosion control measures would remain in place until the impacted areas are revegetated and the risk of erosion has been eliminated.

To the extent possible, haul truck traffic would be limited to improved road surfaces, limiting soil compaction and disturbances. Proper erosion control methods would be employed to limit soil loss due to water and wind action, and all areas of temporary disturbance would be reclaimed at the end of construction activities.

4.4.4 No Action Alternative

Under the No Action Alternative, no new wind power generation or transmission facilities would be built. No new impacts to soil or geologic resources would occur.

4.4.5 Cumulative Impacts

Soil loss through both wind and water erosion has occurred throughout the project vicinity as a result of past and present development. Practices creating soil losses include road construction, and other development, expansion of towns and cities, and the conversion of native lands to crops and grazing lands. The proposed projects would incrementally increase the potential for soil erosion in the analysis area.

Cumulative impacts include the permanent conversion of soils to energy generation, transmission, and substation facilities and appurtenances (e.g., O&M facilities meteorological towers, access roads). Other development could result in additional soil conversion within the region.

4.5 Water Resources

4.5.1 Floodplain Impact Levels

No impacts to floodplains are anticipated, as none are mapped within the project study area.

4.5.2 Groundwater Resources Impact Levels

No impacts to groundwater resources are anticipated. The proposed project would not appreciably affect the ability for precipitation to infiltrate and recharge local and regional aquifers. Runoff from any new impervious surfaces would be shed to adjacent undeveloped pervious areas where it would be allowed to percolate into soils.

4.5.3 Wetlands and Surface Water Resources Impact Levels

Impacts would be considered high where actions would:

- Permanently alter wetland hydrology, vegetation, and/or soils by excavation or fill, where the ecological integrity of a wetland was impaired; or
- Completely fill a wetland or destroy a wetland function.

Impacts would be considered moderate where actions would:

• Partially fill a wetland or degrade a wetland function to the point where recovery would require restoration and monitoring.

Impacts would be considered **low** where actions would:

- Change vegetation or soils for the short term but would not change hydrology; or
- Cause a short-term disruption of a wetland function.

No impact would occur if the action avoids wetlands and their buffers and would not affect wetland functions.

4.5.4 BPA Proposed Action

4.5.4.1 Impacts

The BPA Proposed Action is located far from any of the wetlands identified in the analysis area; therefore no impacts to wetlands would occur. The three jurisdictional drainages (Drainages A, B and C) crossed by the Proposed Action would be spanned, and no access roads would be constructed across them (see Table 4-3). No impacts to surface waters would result from the project.

Water Resource	Project Area	Proposed Action	Impact Level
Wetland W1	Biglow Canyon	Avoided	None
Wetland W2	Klondike III	Avoided	None
Drainage A	BPA Proposed Action	Spanned, no access roads	None
Drainage B	BPA Proposed Action	Spanned, no access roads	Low
Drainage C	BPA Proposed Action	Spanned, no access roads	Low
Drainage D	Middle Alternative	Spanned, no access roads	None
Drainage E	Middle Alternative	Spanned, no access roads	None
Drainage F	Middle Alternative	Spanned, no access roads	None

Table 4-3 Summary of Impacts to Wetlands and Surface Waters

4.5.4.2 Mitigation Measures

Since no impacts to wetlands or surface waters would result from construction of the BPA Proposed Action, no mitigation would be necessary to compensate for project activities.

4.5.5 Middle Alternative

4.5.5.1 Impacts

The Middle Alternative is located far from any of the wetlands identified in the analysis area, therefore no impacts to wetlands would occur. The three jurisdictional drainages (Drainage D, E, and F) crossed by the Middle Alternative would be spanned, and no access roads would be constructed across them (see Table 4-3). No impacts to surface waters would result from the project.

4.5.5.2 Mitigation Measures

Since no impacts to wetlands or surface waters would result from construction of the Middle Alternative, no mitigation would be necessary to compensate for project activities.

4.5.6 Klondike III Wind Project

4.5.6.1 Impacts

No impacts to wetlands or other waters of the state and US are anticipated as a result of this proposed project (DEA, 2005). The one wetland identified within the site boundary (W2) would be avoided through appropriate siting and construction techniques. No impacts to wetlands or surface waters are expected.

4.5.6.2 Mitigation

Since no impacts to wetlands or surface waters would result from construction of the Klondike III Wind Project, no mitigation would be necessary to compensate for project activities.

4.5.7 Biglow Canyon Wind Farm

4.5.7.1 Impacts

Only one wetland was identified in the Biglow Canyon analysis area (W1) and it would not be affected because the collector system would be located to avoid any impacts to that resource (i.e., no impact). Impacts to wetlands and surface water would be limited to minor disturbance of non-jurisdictional drainages, a low impact.

4.5.7.2 Mitigation Measures

Since no impacts to wetlands or surface waters would result from construction of the Biglow Canyon Wind Farm, no mitigation would be necessary to compensate for project activities.

4.5.8 No Action Alternative

No new impacts to wetlands or surface waters would occur under the No Action Alternative.

4.5.9 Cumulative Impacts

Wetland and water resources have been impacted in the region because of past and current development and agricultural operations. Future development activities could

result in the further degradation and reduction of wetlands and water resources in the region.

Most of the project wetland analysis area has been previously disturbed by human activities. No impacts to jurisdictional wetlands or waters are anticipated from the BPA transmission line and substation, Klondike III Wind Project or the Biglow Canyon Wind Farm, and the proposed actions would not contribute to cumulative impacts to water resources.

4.6 Fish and Wildlife

The analysis area contains no habitat for fish species. Only intermittent streams are present in the analysis area (see Section 3.6.2.6). Fish and fish habitat are not discussed further in this section.

4.6.1 Wildlife Impact Levels

Impacts would be considered high where actions would:

- Create a short- or long-term adverse effect on a species *federally listed* as threatened or endangered that could not be mitigated; or
- Create a short or long-term adverse effect on a state-listed species, other rare or declining species or species with high public profiles, values or appeal that could not be mitigated; or
- Create a long-term reduction in the quality or quantity or regional wildlife habitats.

Impacts would be considered **moderate** where actions would:

- Create a short or long-term adverse effect on a species federally listed as threatened or endangered that could be partially mitigated; or
- Create a long-term adverse effect on a state-listed species, other rare or declining species or species with high public profiles, values or appeal that could be partially mitigated; or
- Cause a short-term reduction in the quality or quantity of regional wildlife habitats; or
- Harm or kill individuals of a wildlife species, but not contribute to a reduction in the viability of regional populations.
- Temporarily disturb common wildlife species during critical life stages (e.g., breeding, rearing or roosting).

Impacts would be considered **low** where actions would:

 Create a short- or long-term adverse effect on a species federally listed as threatened or endangered that could be fully mitigated; or

- Create a short- or long-term adverse effect on a state-listed species, other rare or declining species or species with high public profiles, values or appeal that could be fully mitigated; or
- Cause a temporary reduction in the quality or quantity of regional wildlife habitats; or
- Harm or kill isolated individuals of a wildlife species, which would not contribute to a reduction in the viability of local populations.
- Temporarily disturb common wildlife species during non-critical life stages.

No impact would occur when an action would have no effect on wildlife habitat, populations, or individuals.

4.6.2 BPA Proposed Action

4.6.2.1 Impacts

Undeveloped habitats in the analysis area would be spanned by structures or avoided by alignment placement, and no direct impacts to species listed as threatened or endangered under the ESA or by the State of Oregon are anticipated. Bald eagles and peregrine falcons may be present near the analysis area, especially at the northern end near the Columbia River. However, modern transmission line structures are common in bald eagle and peregrine falcon habitat and are only rarely, if at all, implicated in causes of mortality for these species. Therefore, no impact to bald eagles and peregrine falcons from the construction and operation of the transmission line is expected. Impacts to other state-listed sensitive species range from no impact to moderate impacts (see Table 4-4).

One small area of upland tree habitat east of Scott Canyon Road was found to contain a Swainson's hawk nest along an existing public road south of the proposed transmission line route for the Proposed Action (WEST, 2005a). The nest site could be temporarily and indirectly affected by construction activities, but impacts from operations (potential for collision, noise, etc.) would be low considering the size and extent of the lines. Since seasonal restrictions would be implemented if the nest was found to be active, impact levels would be low, since critical life stages would not be impacted. No other raptor nests are present within 0.25 mile of the proposed transmission line.

Impacts from the transmission line to other sensitive bird species would range from none to low. In some instances, such as during very foggy weather, some bird species may strike the overhead ground wire or a conductor and be harmed or killed. Other species, especially songbirds, could be hit by construction vehicles or the small number of additional vehicles associated with maintenance activities as they fly across roads. Both of these events are expected to be rare and only involve individual birds. Impacts from these types of events would not reduce the viability of local populations of any of these species and would be considered a low impact.

Species Common Name	Federal Status	State Status	Impact Level					
(Species Scientific Name)			BPA Proposed Action	BPA Middle Alternative	No Action Alternative	Klondike III Wind Project	Biglow Canyon Wind Project	
Birds								
Bald Eagle (Haliaeetus leucocephalus)	T/EA	Т	None	None	None	Low	Low	
Peregrine Falcon (Falco peregrinus anatum)		E	None	None	None	Low	Low	
Golden eagle (Aquila chrysaetos)	EA		None	None	None	Low	Low	
Swainson's hawk (Buteo swainsoni)		SV	Low	Low	None	Moderate	Moderate	
Rough-legged hawk (<i>Buteo lagopus</i>)			Low	Low	None	Moderate	Moderate	
Red-tailed hawk (<i>Buteo jamaicensis</i>)			Low	Low	None	Moderate	Moderate	
Ferruginous hawk (<i>Buteo regalis</i>)	SoC	SC	Low	Low	None	Moderate	Moderate	
Long-billed curlew (Numenius americanus)		SV	Low	Low	None	Low	Low	
Bank swallow (<i>Riparia riparia</i>)		SU	Low	Low	None	Low	Low	
Columbian sharp-tailed grouse (<i>Tympanuchus phasianellus</i> columbianus)	SoC		None	None	None	None	None	
Western greater sage grouse (Centrocercus urophasianus)	SoC	SV	None	None	None	None	None	
Common nighthawk (Chordeiles minor)		SC	Low	Low	None	Low	Low	
Eastern Oregon willow flycatcher (<i>Empidonax traillii</i> adastus)	SoC	SU	None	None	None	None	Low	
Western burrowing owl (Athene cunicularia hypugaea)	SoC	SC	Low	Low	None	Low	Low	
Grasshopper sparrow (Ammodramus savannarum)		SV/SP	Low	Low	None	Moderate	Moderate	
Lewis' woodpecker (<i>Melanerpes lewis</i>)	SoC	SC	None	None	None	None	None	
Western bluebird (Sialia mexicana)		SV	Low	Low	None	Low	Low	
Western meadowlark (Sturnella neglecta)		SC	Low	Low	None	Moderate	Moderate	
Yellow-breasted chat (<i>Icteria</i> virens)	SoC	Soc	Low	Low	None	Low	Low	
Loggerhead shrike (<i>Lanius ludovicianus</i>)		SV	Low	Low	None	Low	Low	

Table 4-4 Impact to Federal and State Listed Threatened, Endangered and Sensitive Species

	State Status	Impact Level					
Federal Status		BPA Proposed Action	BPA Middle Alternative	No Action Alternative	Klondike III Wind Project	Biglow Canyon Wind Project	
SoC		None	None	None	None	None	
	SU	Moderate	Moderate	None	Moderate	Moderate	
		None	None	None	Moderate	Moderate	
SoC	SU	None	None	None	Low	Low	
SoC	SU	None	None	None	Low	Low	
SoC	SC	None	None	None	Low	Low	
	SV	None	None	None	Low	Low	
SoC	SU	None	None	None	Moderate	Moderate	
SoC	SU	None	None	None	Low	Low	
SoC		None	None	None	Low	Low	
	SC	None	None	None	None	Low	
	SV	None	None	None	None	Low	
	SC	None	None	None	None	None	
	SV	Low	Low	None	Low	Low	
	SoC SoC SoC SoC SoC SoC SoC SoC SoC	StatusStatusSoCSoCSUSUSoCSU	StatusBPA Proposed ActionSoCNoneSUModerateSUModerateSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSUNoneSoCSVNoneSCNone	StatusStatusBPA Proposed ActionBPA Middle AlternativeSoCNoneNoneSUModerateModerateNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNoneSoCSUNoneNone	Federal StatusState BPA Proposed ActionBPA Middle AlternativeNo Action AlternativeSoCNoneNoneNoneSUModerateModerateNoneSUNoneNoneNoneSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSUNoneNoneNoneSoCSCNoneNoneNoneSCNoneNoneNone	Federal StatusStatusBPA Proposed ActionBPA Middle AlternativeNo Action AlternativeKlondike III Wind ProjectSoCNoneNoneNoneNoneSUModerateModerateNoneModerateSUModerateModerateNoneModerateSUMoneNoneNoneModerateSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneLowSoCSUNoneNoneNoneNoneSoCSUNoneNoneNoneNoneSoCSUNoneNoneNoneNoneSoCSUNoneNoneNoneNoneSUNoneNoneNoneNoneNone <tr t<="" td=""></tr>	

Sensitive mammal species would not be affected by the construction or operation of the transmission line with the possible exception of the white-tailed jackrabbit. This species could be temporarily affected during the breeding season by construction activities, a moderate impact. Bat species would not be affected, as they can echolocate transmission line conductors, ground wires and towers, and are not susceptible to collisions with them.

Bird fatalities could result from impacts with overhead ground wires during foggy conditions, and from increased road traffic along access roads. There could also be temporary disturbance of common nesting birds such as horned lark and meadowlark, denning coyotes, rabbits, or resting sites of ungulates from equipment traveling along access roads (low to moderate impact). Other construction activities such as boring, trenching, and excavation could temporarily disturb these and other common species, such as reptiles. Temporary disturbance to these species during critical life stages is considered a moderate impact for common species and a low impact at all other times. The proposed transmission lines could increase the amount of perching opportunities for some raptor species (e.g., red-tailed hawk, Swainson's hawk, and kestrel). Additional perching opportunities could mean that these species spend more time foraging for small mammals and reptiles in the area surrounding the transmission line. This could lead to some very minor increased predation is not expected to cause any reduction in the viability of those populations (low impact).

While some raptor species may be attracted to the perching opportunities created by the proposed transmission lines, the potential for bald eagles to be attracted to the new transmission lines is considered to be small. There is no habitat within the project area that would support eagle use, and no large sources of carrion (e.g., sheep or cattle pastures) that would attract bald eagles. With the exception of the area around the John Day Substation (where there are already multiple transmission structures), the new transmission lines would be located away from open water with limited or no line-of-sight to open water. Bald eagle use of the project area would likely be limited to eagles traveling between the Columbia River and the John Day River, and these eagles would generally be flying at altitudes well above the turbines. Bald eagles thus would not be expected to suffer greater exposure to turbine collisions from the perching opportunities created by the proposed transmission lines.

4.6.2.2 Mitigation Measures

According to Oregon Department of Fish and Wildlife (ODFW) standards, the upland tree habitat is considered irreplaceable, since it supports a species (Swainson's hawk) that ODFW considers a State Sensitive species. If the Swainson's hawk nests in this area in subsequent years, construction activities would be coordinated with ODFW and limited during the Seasonality and Sensitive Period for the species, which is June 1 through August 31 (ODFW, 1994). With this coordination and mitigation, there would be no impact to Swainson's hawks from the BPA Proposed Action.

The following mitigation actions would apply to all project activities and would benefit all habitat types and wildlife species in the project vicinity:

- Sensitive areas would include all undeveloped habitats within the project corridor, since these may provide nesting or denning areas for special status/sensitive wildlife. These areas would be flagged in the field prior to construction and the construction contractors would be directed to avoid them during construction.
- Road construction and vehicle use would be minimized where possible to minimize impacts to agricultural habitats. For instance, if construction occurs during summer, access to tower locations would not have to be graveled.
- For habitat restoration and revegetation, seed mixes would be developed in consultation with ODFW. Restoration efforts would be discussed with the landowner to take into consideration existing land use activities and their potential impacts to the vegetation restoration efforts.
- Measures to reduce the potential spread of noxious weeds would be developed in consultation with the Sherman County Soil and Water Conservation District. The facility would be monitored regularly to prevent the spread of noxious weeds.
- Best management practices and erosion and sediment control measures would be employed during project construction to avoid and/or minimize impacts to downslope areas. Areas of unavoidable soil disturbance would be stabilized downslope with straw wattles and bio-filter bags.

4.6.3 Middle Alternative

4.6.3.1 Impacts

Impacts would be similar to those described for the Proposed Action, except that the Swainson's hawk nest near Scott Canyon Road would not be disturbed by this alternative.

4.6.3.2 Mitigation Measures

Mitigation would be the same as those described for the Proposed Action.

4.6.4 Klondike III Wind Project

4.6.4.1 Impacts

Impacts to federal and state listed and sensitive species are shown in Table 4-4.

No impacts to bald eagles or bald eagle habitat are anticipated from the Klondike III Wind Project due to the lack of suitable bald eagle habitat near the proposed project and the generally low levels of observed raptor mortality at recent wind power projects. For similar reasons an extremely low risk of mortality is anticipated for species only infrequently observed within the site boundaries, such as the peregrine falcon.

A Swainson's hawk nest was identified less than 100 feet north of Dehler Road. The nest lies within a small locust tree in a weedy area used to store farm equipment and tractors. The upland tree habitat is considered irreplaceable by ODFW since it supports a State-listed Sensitive Species. If the Swainson's hawk nests in this area in subsequent years, construction activities would be coordinated with ODFW and limited during the Seasonality and Sensitive Period for the species, which is June 1 through August 31 (ODFW, 1994). An active Swainson's hawk nest was seen in a locust tree near an abandoned house south of Gosson Lane. It lies about 200 feet outside the analysis area. The female was seen sitting on the nest and the male was displaying territorial behavior during site visits (DEA 2005). Since the nest is outside the analysis area, seasonal restrictions would not be necessary.

No other raptor sightings (such as red-tailed hawks or northern harrier) in the analysis area were associated with known nests; they were incidental sightings within the raptors' larger home range. Raptor mortality estimates from the Stateline Wind Project and the Nine Canyon Wind Project have ranged from 0.05 to 0.07 raptor fatalities per turbine per year, with most fatalities consisting of red-tailed hawks and American kestrels (Erickson et al., 2004). Raptor mortality for Klondike III is expected to be similar (8 to 12 per year).

A breeding loggerhead shrike was found in an area within a small island of small locust trees surrounded by agricultural land. The Seasonality and Sensitive Period for the species is April 15 through September 1. ODFW would be consulted on this species and construction activities may be limited during this time period. Impacts would be low.

Average fatality estimates for all birds from regional wind facilities have ranged from 0.9 to 2.9 birds per MW per year. Overall bird use and species richness estimated for the facility was low relative to other wind facility sites in the United States, including other open habitat sites, because most available habitat is cultivated. Overall bird fatality is anticipated to be between 1 and 2.75 fatalities per MW per year (for a total between 275 and 756), a moderate impact. The most common bird fatality probably would be horned larks, a common grassland species. This would be considered a moderate impact since it would create a long-term adverse affect on a common species, but not a high impact, since few rare or special status birds are anticipated to be affected.

A single white-tailed jackrabbit was found outside the analysis area just north of McDonald Ferry Lane, at the easternmost edge of the Klondike III Wind Project in CRP habitat. No ground-disturbing activities are proposed outside the road prism adjacent to the sighting. Therefore, no impact would result and no seasonal restrictions or coordination with ODFW is recommended.

Big game species such as deer would likely be temporarily displaced during active construction (a low impact). Slightly increased human presence during operation of the facility may cause slightly more periodic disturbance than currently exists, however the presence of the turbines is not expected to cause long-term impacts as big game species typically adapt to the presence of large stationary or semi-stationary objects.

Most bat species roost in structures such as buildings, caves, mines and bridges, which are rare to absent within the analysis area; therefore, the construction or retirement of the facility is not anticipated to result in the loss or degradation of bat roosting and foraging habitat in the analysis area. The potential impact to bats could be from collision mortality during operation. Available evidence indicates that this is confined primarily to the migratory species, especially for open agriculture and grassland projects in the West. Migratory bat mortality would likely be in the range of 1.5 to 2.5 bats per MW per year for migratory bat species (for a total of 410 to 683 bats), a moderate impact and lower for resident bat species (low impact).

Other common wildlife species could be temporarily disturbed or displaced during critical nesting or denning periods, which would be a moderate impact. No specific mitigation measures are proposed for these species, as they are relatively common and the project would not have an effect on the health of their populations.

Overall, impacts to wildlife species from the proposed project range from low to moderate.

4.6.4.2 Mitigation Measures

The project would have no impacts on federally-listed species; therefore no mitigation for listed species is necessary.

The mitigation measures that would be implemented for Klondike III would be similar to those described for the BPA action alternatives. They would apply to all project activities and are anticipated to benefit all habitat types/categories and wildlife species. In addition, a wildlife monitoring and mitigation plan that is standardized with methods used in monitoring programs at regional and national wind power facilities has been developed and will be implemented (see Appendix F). The monitoring program will include bird and bat fatality monitoring, raptor nesting surveys, avian use surveys and reporting. Depending on the outcome of the monitoring program, different levels and types of mitigation would be proposed if fatalities exceed the pre-established thresholds defined in Appendix F. The amount and type of mitigation would be appropriate to the observed impacts and would be conducted in coordination with the Oregon Department of Fish and Wildlife and EFSC. Mitigation would be either grassland/shrubland habitat restoration or conservation for bird species, and either habitat improvement projects or payment to conservation organizations for bat species.

4.6.5 Biglow Canyon Wind Farm

4.6.5.1 Impacts

Impacts to wildlife species for the Biglow Canyon Wind Farm would be similar to those described for the Klondike III project.

Because of the low probability of use by bald eagles and peregrine falcons in the analysis area and the mitigation measures described below, it is not expected that the facility would have any impact on federal or state-listed bird species. During diurnal walking surveys for sensitive status species, the following species were observed: grasshopper sparrows, short-eared owls, Swainson's hawk, white-tailed jackrabbits, and ferruginous hawk. During nocturnal surveys, white-tailed jackrabbits and western toads were observed (WEST, 2005b).

Two active raptor nests were seen within 1,000 feet of proposed turbine corridors: one Swainson's hawk and one red-tailed hawk. Two additional Swainson's hawk nests were located 1,794 feet and 1,968 feet from a proposed turbine corridor centerline. One additional red-tailed hawk nest was documented in riparian trees 1,220 feet from a proposed turbine corridor centerline. The only other nest in upland trees is an inactive nest of unknown species 1,591 feet from a turbine corridor centerline.

Average fatality estimates for all birds from regional wind facilities have ranged from 0.9 to 2.9 birds per MW per year. Overall bird use and species richness estimated for the facility was low relative to other wind facility sites in the United States, including other open habitat sites, because most available habitat is cultivated. Overall bird fatality is anticipated to be between 1 and 2.75 fatalities per MW per year (for a total between 450 and 1,238), a moderate impact. The most common bird fatality probably would be horned larks, a common grassland species. This would be considered a moderate impact since it would create a long-term adverse affect on a common species, but not a high impact, since few rare or special status birds are anticipated to be affected.

Waterfowl mortality is expected to be low, based on monitoring results of existing facilities in the region, the lack of open water habitat, and the relatively infrequent use of the facility by Canada geese.

Displacement impacts to birds in grassland and shrub-steppe habitats are anticipated to be minimal with reduced densities occurring within less than 328 feet of facilities located in these habitats. Less than 1 percent of the area within 492 feet of the facility is either native grassland or shrub-steppe habitats. This would be a low impact.

Results of fatality monitoring for existing Columbia Basin wind facilities indicate a mortality range from 1.0 to 2.5 bats per MW per year. Based on this range and on similar characteristics of the facility area to those other facilities, bat mortality would also be similar (for a total of 450 to 1,125 bats per year) and primarily involve migratory silver-haired and hoary bats. This would be a moderate impact.

Little risk is expected to non-migratory bat populations in the facility area, given the lack of habitat and fatality results of other facilities in similar habitats, and no impacts to threatened or endangered bat species are anticipated.

Big game species such as deer would likely be temporarily displaced during active construction (a low impact). Slightly increased human presence during operation of the facility may cause slightly more periodic disturbance than currently exists, however the presence of the turbines is not expected to cause long-term impacts as big game species typically adapt to the presence of large stationary or semi-stationary objects.

Road and facility construction would result in a slight loss of foraging and breeding habitat for small mammals. Ground-dwelling mammals would lose the use of the permanently affected areas; however, they are expected to repopulate the temporarily

affected areas. Some small mammal fatalities can be expected from vehicle activity during operations, but impact levels are expected to be low. No evidence exists that supports the presence of Washington ground squirrels in Sherman County.

No impacts to amphibians are anticipated during operations. Impacts to reptiles during operation are likely to be limited to direct mortality as a result of vehicle collisions and are expected to be low.

The most probable impact to birds resulting from the operation of the facility is direct mortality or injury caused by collisions with the turbines. Collisions could occur with resident birds foraging and flying within the facility area, or with birds migrating through the facility area. Other impacts could include abandonment of the area because of disturbance caused by facility activities, and mortality or injury caused by collisions with vehicles or other equipment. Both types of impacts would be considered low to moderate as they would likely be isolated occurrences involving individual birds as opposed to large flocks of birds.

4.6.5.2 Mitigation

The Biglow Canyon Wind Farm is not expected to affect listed species; therefore, no mitigation for listed species impacts is required.

The following mitigation measures would be implemented to minimize potential adverse impacts to birds and sensitive habitat.

- Permanent meteorological towers either would not have guy wires, to reduce the potential for collision of birds with guy wires, or if guy wires are used they would be equipped with the type of bird deflectors approved by the ODFW.
- <u>PGE</u> would survey the status of known Swainson's hawk or other raptor nests in the vicinity of proposed construction activities (i.e., within 0.5 mile) before construction activities begin. If an active nest is found, and construction activities are scheduled to occur during the sensitive nesting and breeding season (i.e., mid-April to mid-August), <u>PGE</u> would not engage in construction activities within a 0.25-mile buffer around the nest until the nest fledges young or the nest fails (e.g., is abandoned), unless ODFW approves an alternative plan. If ground-disturbing construction activities continue into the sensitive nesting and breeding season for the following year, <u>PGE</u> would not engage in ground-disturbing construction activities within the 0.25-mile buffer, if the nest site is found to be active, until the nest fledges young or the nests fails (e.g., is abandoned), unless ODFW approves an alternative plan.
- <u>Similar to Klondike III, a wildlife monitoring and mitigation plan that is</u> <u>standardized with methods used in monitoring programs at regional and national</u> <u>wind power facilities has been developed and will be implemented (see</u> <u>Appendix H). The monitoring program would include bird and bat fatality</u> <u>monitoring, raptor nesting surveys, avian use surveys and reporting. Depending</u> <u>on the outcome of the monitoring program, different levels and types of mitigation</u> <u>would be proposed if fatalities exceed the pre-established thresholds defined in</u>

Appendix H. The amount and type of mitigation would be appropriate to the observed impacts and would be conducted in coordination with ODFW and EFSC. Mitigation would be either grassland/shrubland habitat restoration or conservation for bird species, and either habitat improvement projects or payment to conservation organizations for bat species.

4.6.6 No Action Alternative

No new impacts to fish and wildlife habitats would occur under the No Action Alternative.

4.6.7 Cumulative Impacts

Potential cumulative impacts to fish and other aquatic resources from past, present, and future development in the region include the loss of riparian habitat, increased sediment loading, increased stream temperatures, pollution from herbicide and insecticide use, changes in peak and low stream flows, fragmentation of fish habitat, decreases in streambank stability, and altered nutrient supply. No impacts to fish species are anticipated from the BPA transmission line and substation, Klondike III Wind Project, or the Biglow Canyon Wind Farm, and the proposed projects would not contribute to cumulative impacts to fish species.

Conversion to agriculture (e.g., cottonwood farming and crop changes or rotation), habitat fragmentation, livestock grazing, urbanization, and the fire cycle have been identified as large scale wildlife management issues in the shrubland and grassland habitats of eastern Oregon and Washington (Johnson and O'Neil, 2001). The construction of multiple wind power and transmission facilities as well as other development in the project vicinity could cause cumulative impacts to some wildlife species. Cumulative impacts from the operation of the wind power and transmission line facilities on bird and bat species is more likely than impacts to terrestrial species, because these facilities have potential to harm or kill animals that strike them. A study of the potential cumulative impacts to bird and bat species was conducted in 2006 for the Klondike I and II, Klondike III, Biglow Canyon and Orion South projects (West, 2006) This study is included as Appendix A to this EIS. An additional regional analysis of possible cumulative impacts to birds was also completed using the cumulative wind projects identified in Table 4-1. The following summarizes the results of these two cumulative analyses.

Non-Avian Species

The current and proposed wind projects near the analysis area would have no to low impacts to non-avian terrestrial species because almost the entire area is under wheat cultivation and disturbance to these species occurs regularly. The reduction in habitat for terrestrial species from construction of the facilities is not expected to result in any changes in regional populations. The addition of transmission structures would likely increase perching opportunities for some raptor populations. This could have an indirect

effect on small mammal and reptile populations in the areas around the structures due to predation. However, the amount of additional predation is not expected to affect population dynamics of any of these species.

Raptors

Red-tailed hawk. American kestrel, and northern harrier account for most of the raptor use in spring, summer and fall in the analysis areas. In the winter, rough-legged hawk and red-tailed hawk account for most of the raptor use. These species are expected to be the raptor species with the highest risk of mortality across the projects. The potential exists for other raptor species to collide with turbines, including Swainson's hawk, ferruginous hawk, turkey vulture, golden eagle, Cooper's hawk, sharp-shinned hawk, and prairie falcon. However, the mortality risk associated with these species is expected to be much lower than the risk for red-tailed hawks and American kestrel due to the lower use estimates and exposure indices for these species. Common owl species such as great-horned owls, which are typically not effectively surveyed during the day, may also be at risk of collision. Some raptors such as turkey vultures appear less susceptible to collision than most other raptors (Orloff and Flannery 1992, Erickson et al. 2001). In addition, there have been very few northern harrier, ferruginous hawk, and rough-legged hawk fatalities recorded at wind plants, based on recent published data (Erickson et al. 2002). Golden eagle use of the sites is low relative to other wind sites (e.g., Foote Creek Rim, Young et al. 2003) and mortality for golden eagles is also expected to be very low.

Raptor mortality is expected to be similar to other new generation wind projects with similar turbine types located in the Oregon-Washington region. At these other projects, raptor use estimates ranged from about 0.2 to 0.6 per 20-minute survey compared to an average estimate of 0.3 raptors/20-minute survey for Sherman County (West, 2006).

Potential raptor mortality within the combined analysis area would be about 0.024 raptors per turbine per year or one raptor for every 40 turbines per year. Using this raptor mortality rate, the total annual raptor mortality estimate would be about 11 raptor fatalities per year for the three projects combined if all 440 of the proposed turbines are constructed (or one raptor for every 63 MW of generating capacity). This fatality estimate may vary from the expected range based on many factors, including the number of occupied raptor nests near the wind projects after construction, turbine size and other site specific and/or weather variables.

The potential raptor mortality from all of the regional wind projects identified in Table 4-1 would be about 50 raptors per year.

Passerines

Passerines have been the most abundant avian fatality at other wind projects studied (Johnson et al. 2002, Young et al. 2003, Erickson et al. 2000, 2001, 2002), often comprising more than 80 percent of the avian fatalities. Both migrant and resident

passerine fatalities have been observed. Given that passerines make up the vast majority of the avian observations at the sites, it is expected passerines would make up the largest proportion of fatalities for all projects combined. Passerine species most common to the project sites would likely be most at risk, including horned lark and western meadowlark.

Mortality rates at other regional wind projects for all birds combined have ranged from about 0.63 birds per turbine per year to 2.56 birds per turbine per year (or 0.42 to 1.71 birds per MW per year assuming 1.5 MW turbines). Based on the mortality estimates from the other wind plants studied, it is expected that all passerine bird mortality would fall within the mid range or about 1 to 2 birds per turbine per year. Under the assumption that 440 turbines are constructed for all three projects, the total range of passerine mortality would be 440 to 880 fatalities per year, or 0.63 to 1.28 bird fatalities per MW per year. Because horned lark made up slightly more than 50 percent of the bird use during the studies, it is expected that about 50 percent of the fatalities would be of this species. This trend has been shown at the other regional projects in agriculture settings. Using this assumption, about 200-400 horned lark fatalities would occur if all the wind turbines were constructed. The level of estimated mortality is not expected to have any local population level consequences for individual species, due to the expected low fatality rates for most species and the high population sizes of the common species such as horned lark, western meadowlark, and European starling.

As additional wind facilities are developed in the region, more birds would be killed. To further understand the relative level of potential impacts to passerine bird populations from the construction of these wind projects, estimates were made of how many birds could be killed and how much of the current regional bird population would be affected if all of the reasonably foreseeable wind projects (see Table 4-1) in the region are constructed.

To determine regional population effects an area of similar terrain and topography in the eastern portion of the Columbia Basin was selected that included the wind projects listed in Table 4-1. This area lies between The Dalles to the west and Boardman to the east, and within an area about 22 miles wide on either side of the Columbia River (north to south direction). This area totals about 2,600 square miles of mostly agricultural and shrub-steppe areas and is similar in topography, habitat and bird use to the Klondike-Biglow area covered by the local cumulative impacts study, and to other areas from which regional avian mortality data exists. There is a biological justification for assuming, and no apparent reason not to assume, that impacts within the 2,600 square mile region will be similar to and fall within the range of reported impacts at existing projects within this region. Within the 2,600 square mile region it is appropriate, at the level of considering cumulative impacts, to take existing mortality data expressed as per turbine/per megawatt figures, and to extrapolate by multiplying these figures by the total numbers of turbines or megawatts making up all "reasonably foreseeable" projects.

The reasonably foreseeable wind projects total about 3,134 MW of generating capacity. Using the mortality rates observed at some of these facilities (see above), the total passerine mortality if all of these projects are constructed could range from about 1,980 to 4,000 birds per year.

Data on bird density in shrub-steppe habitat was then collected. Two studies that looked at passerine bird density were identified (Smith, et al. 1984, Schroeder 2001). The average passerine density identified was about 392 birds per square mile which, when multiplied by the regional area, results in a total population of about 1,033,000 birds. Both studies looked at relatively undisturbed shrub-steppe habitat, so they probably represent an overestimation of the actual bird density in the region, which is mostly in agricultural lands and tends to have a lower bird species density than undisturbed shrub-steppe habitat.

From these passerine bird mortality, density and population estimates, the impact to the total passerine bird population of the region from the proposed wind projects (if they are all constructed) is conservatively estimated to range from about 0.19 percent to 0.39 percent each year, and is likely much lower. Some species may have proportionately higher impacts based on abundance and habitat requirements (see previous discussion about horned larks), but given the overall relatively low observed impacts from similar wind projects, the cumulative impacts to all bird species is expected to be moderate, and mortality rates are not expected to reduce the viability of any bird species populations in the region.

ESA-Listed Species

The only ESA-listed bird species present in the analysis area and surrounding areas is the bald eagle. This species tends to congregate near open water or forested areas. Current and proposed wind farms are generally located well away from these areas, thus any impacts to this species from turbine or transmission line impacts would be isolated and rare.

Bats

Bat foraging areas such as riparian zones, shrublands, streams, and other water sources are limited in the project area. Wind projects, especially those in open habitats, pose little risk to non-migratory bat populations. Based on the available monitoring information and characteristics of the sites, bat mortality at the projects proposed for northern Sherman County is not expected to vary significantly from other regional wind projects. The results of fatality monitoring for regional wind projects indicate mortality ranges from less than 1 to slightly over 3.0 bats per turbine per year or about 1 to 2.5 bats per MW per year (West, 2006).

Results of the Klondike I monitoring suggest that impacts in Sherman County may be on the lower end of this range. A conservative estimate of bat mortality would fall within the mid range or about 1.5 to 2.5 bats per turbine (or per MW) per year. Provided that 440 turbines are constructed for all three projects, the total range of bat mortality would be from 660 to 1,100 fatalities per year. Actual levels of mortality are unknown and could be lower or higher, depending on factors such as regional migratory patterns of bats, patterns of local movements through the area, and the response of bats to turbines, individually and collectively. Mortality would involve primarily silver-haired and hoary bats, and no impacts to threatened or endangered bat species are anticipated. The level of this impact on hoary and silver-haired bat populations is hard to predict, as there is very little information available regarding the overall population size and distribution of the bats potentially affected. Other regional monitoring studies suggest resident bats do not appear to be significantly affected by wind turbines and almost all mortality is observed during the fall migration period. Also, hoary bat and silver-haired bats, which are expected to be the most common fatalities, are widely distributed in North America.

For the larger region (the 2,600-square mile area described previously), total bat mortality could range from 3,130 to 8,000 bats annually if all of the proposed wind projects are constructed. Overall populations of bats in the region are not well documented, thus conclusions about population effects from turbine mortality would be speculative.

4.7 Vegetation

4.7.1 Impact Levels

Impacts would be considered high where actions would:

- Create an unavoidable adverse effect on a federally-listed threatened or endangered plant species;
- Significantly reduce the quantity or quality of a regionally or nationally important botanical reserve, plant population, or similar botanical habitat area;
- Spread noxious weeds due to construction or maintenance; or
- Adversely affect rare or declining species at the regional level.

Impacts would be considered **moderate** where actions would:

- Create an effect on threatened or endangered plant species that could be partially mitigated;
- Temporarily disturb sensitive plants during construction but would not affect the viability of local populations;
- Cause a local reduction in the quantity or quality of vegetation communities (as opposed to regional reductions); or
- Marginally reduce the productivity of adjacent vegetation communities or resources (such as wetland plant communities or botanical reserves).

Impacts would be considered **low** where actions would:

- Create an effect that could be largely mitigated;
- Reduce the quantity or quality of vegetation communities confined to the site of the action;

- Cause no major effect on productivity of adjacent vegetation communities;
- Temporarily disturb common plant species;
- Reduce plant communities that are very common in the project vicinity;
- Adversely affect relatively common species at a local level (i.e., occurring within the immediate vicinity of the project and not affecting regional populations); or
- Cause temporary effects or those that could be minimized by site planning or by placing seasonal restrictions on construction activities.

No impacts would occur when an action would create no impacts or fewer impacts than the low impact level.

4.7.2 BPA Proposed Action

4.7.2.1 Impacts

The Proposed Action would affect only agricultural areas in the long term. Towers and substation facilities would remove about 16.6 acres of agricultural plant communities, which are very common in the region (see Table 4-5). Therefore, impacts would be low. Undeveloped habitats (i.e., not in agricultural use) would be spanned by structures or avoided, so no long-term impacts to those vegetative communities would occur.

During construction, temporary access to tower construction sites would be gained by crossing existing agricultural lands, which would be re-planted with agricultural crops or cover crops to restrict the spread of weeds. The total amount of temporary disturbance would be about 116 acres. Short-term impacts would be low.

4.7.2.2 Mitigation Measures

The following mitigation actions would apply to all project activities and are anticipated to benefit all habitat vegetation/categories and wildlife species:

- Maps would be prepared to show sensitive areas that are off limits during the construction phase. These areas would be flagged in the field prior to construction and the construction contractors would be directed to avoid them during construction. Sensitive areas may include vegetation types that provide nesting or denning areas for special status/sensitive wildlife.
- Road construction and vehicle use would be minimized where possible to minimize impacts to sensitive habitats. For instance, if construction occurs during summer, access to tower locations would not have to be graveled.
- For habitat restoration and revegetation, seed mixes would be developed in consultation with ODFW. Restoration efforts would be discussed with the landowner to take into consideration existing land use activities and their potential impacts to the vegetation restoration efforts.

- A weed survey would be completed prior to and following construction. Measures to reduce the potential spread of noxious weeds would be developed in consultation with the Sherman County Soil and Water Conservation District. The facility would be monitored regularly to prevent the spread of noxious weeds.
- BMPs and erosion and sediment control measures would be employed during project construction to avoid and/or minimize impacts to downslope areas. Areas of unavoidable soil disturbance would be bounded downslope with straw wattles and bio-filter bags.

Type of Land Disturbed	BPA Proposed Action	BPA Middle Alternative	BPA No Action Alternative	Klondike III Wind Project	Biglow Canyon Wind Farm				
Temporary Impacts									
Grassland	0	0	0	<u>3.2</u>	<u>1.0</u>				
Shrub-Steppe	0	0	0	<u>0.0</u>	<u>1.5</u>				
CRP	0	0	0	<u>38.8</u>	<u>16.5</u>				
Agricultural	116.19	119.95	0	<u>250</u>	<u>363.5</u>				
Total	116.19	119.95	0	<u>292</u>	<u>382.5</u>				
Permanent Impacts									
Grassland	0	0	0	<u>.01</u>	<u>0.88</u>				
Shrub-Steppe	0	0	0	<u>0.0</u>	<u>0.25</u>				
CRP	0	0	0	<u>6.8</u>	<u>10.12</u>				
Agricultural	16.56	16.63	0	<u>62</u>	<u>156.7</u>				
Total	16.56	16.63	0	<u>68.9</u>	<u>167.95</u>				

Table 4-5 Vegetation Impacts

4.7.3 Middle Alternative

4.7.3.1 Impacts

Impacts of the Middle Alternative would be similar to those of the Proposed Action. Towers and substation facilities would eliminate about 16.6 acres of agricultural plant communities. The total amount of temporary disturbance would be about 120 acres. Impacts to vegetation would be low.

4.7.3.2 Mitigation Measures

The same mitigation measures listed for the Proposed Action would be implemented for the Middle Alternative.

4.7.4 Klondike III Wind Project

4.7.4.1 Impacts

The Klondike III Wind Project facilities would permanently impact about 0.01 acre of grassland habitat, <u>no</u> shrub-steppe habitat, <u>6.8</u> acres of CRP habitat, and <u>62</u> acres of agricultural habitat. Because the impacts would be confined to the site of the action and the agricultural impacts would reduce common plant communities, the impacts would be low.

Construction activities would temporarily impact about <u>3.2</u> acres of grassland, <u>2.0</u> acres of shrub-steppe, <u>38.8</u> acres of CRP, and <u>250</u> acres of agricultural lands. There would also be about 0.03 acre of upland tree habitat temporarily impacted, although no trees would be removed or altered. The impacts would be confined to the site of the action, are temporary, and would only reduce common plant communities; therefore, the impact level would be low.

During the site visits conducted for the Klondike III Wind Project, no habitat for special status/sensitive plant species was found, and none is believed to be within the project corridor based on degraded site conditions.

4.7.4.2 Mitigation Measures

To mitigate for long-term effects to grassland habitat, PPM Energy would enhance other grassland habitats in the analysis area. In addition to the enhancement, a conservation easement, deed restriction, or other similar protective measure would be undertaken for the area in order to protect this area as wildlife habitat.

Temporary, construction-related impacts would be mitigated by:

- Requiring project facilities to be the minimum size needed for operations.
- Replacing agricultural topsoil to original condition.
- Using BMPs to prevent loss of topsoil during construction.
- Performing repair activities during operations.
- Controlling noxious weeds in areas disturbed by construction activities.

4.7.5 Biglow Canyon Wind Farm

4.7.5.1 Impacts

The Biglow Canyon Wind Farm facilities would permanently impact about 0.88 acres of grassland habitat, 0.25 acre of shrub-steppe habitat, 10.1 acres of CRP habitat, and 156.7 acres of agricultural habitat. Because the impacts would be confined to the site of the action and the agricultural impacts would reduce common plant communities, the impacts would be low.

Construction activities would temporarily impact about 1.0 acre of grassland, <u>1.5</u> acres of shrub-steppe, <u>16.5</u> acres of CRP, and <u>363.5</u> acres of agricultural areas. The impacts would be confined to the site of the action, are temporary, and would reduce common plant communities; therefore, the impact level would be low.

4.7.5.2 Mitigation Measures

<u>PGE</u> would enhance or create at least 11 acres of shrub-steppe habitat to mitigate for long-term impacts to undeveloped vegetative communities. A number of areas near and in the John Day River Canyon have been identified as potential areas for mitigation. These potential areas are located away from turbine corridors. A detailed mitigation plan would be finalized with willing landowners, with the concurrence of ODFW regarding mitigation area size, location, and vegetative goals. Both ODFW and the Sherman County Soil and Water Conservation District would be consulted regarding procedures for weed control and vegetation establishment and management.

Temporary impacts from construction activities would be mitigated by:

- Noxious weed control in construction areas, as described previously.
- Use of BMPs to minimize topsoil loss, and compliance with an erosion and sedimentation control plan approved by DEQ as part of the NPDES program in areas adjacent to drainage features.
- Consulting with Sherman County Soil and Water Conservation District for proper procedures for restoring agricultural quality to its original condition.

Because noxious weeds can have detrimental effects on native plant populations, the following additional measures would be implemented to control the introduction and spread of undesirable plants during and after construction:

- Areas disturbed during construction would be revegetated expeditiously.
- A noxious weed control plan would be developed following guidelines based upon consultation with the Sherman County Soil and Water Conservation District.
- The noxious weed control plan would be finalized prior to construction and would be implemented over the life of the Biglow Canyon Wind Farm facility.

4.7.6 No Action Alternative

No new impacts to vegetative resources would occur under the No Action Alternative. Current levels of disturbance would continue under this alternative. These levels include any impacts currently associated with maintenance activities for the existing BPA transmission lines and substations. These impacts could include noxious weed transport due to vehicular traffic, transmission structure maintenance, current vegetation management practices, and other such activities. However, any potential ongoing impacts from maintenance of existing BPA transmission lines and substations would occur within a previously disturbed environment, which would result in no new impacts to undisturbed resources.

4.7.7 Cumulative Impacts

Native plant communities are being lost in the region because of past and current development and actions, and these trends will likely result in the further reduction of native plant communities. Cumulative projects in the region including the wind projects listed in Table 4-1 have impacted or could impact agricultural land and native habitats.

Most vegetative communities in the analysis area have been previously disturbed by human activities. The actions associated with the proposed projects would contribute incrementally and in a relatively minor way to the continuing cumulative loss of native vegetation communities. However, it is expected that long-term impacts of BPA's Proposed Action and the wind projects to undeveloped habitats would be mitigated and not contribute to cumulative impacts.

4.8 Visual Resources

4.8.1 Impact Levels

Impacts would be considered high where actions would:

- Become the dominant feature or focal point of the view, especially from residences or schools; or
- Become the dominant feature or focal point of the view and adversely affect the existing character and quality of views from parks, recreation facilities, public trails, and public lands and waters used for dispersed recreation where the appreciation of natural and scenic resources is a valued part of the use, such as the CRGNSA; or
- Affect a large number of sensitive viewers in predominantly the *foreground* and middle ground of the view; or
- Become the dominant feature or focal point of view from major travel corridors along which existing scenic quality is high and/or policies have been applied to preserve and enhance aesthetic values.

Impacts would be considered moderate where actions would:

- Be clearly visible in the view but not the dominant feature of the view; or
- Affect a large number of sensitive viewers mostly in the middleground of their view; or
- Not become the dominant view but are in view from parks, recreation facilities, public trails, and public lands and waters used for dispersed recreation where the appreciation of natural and scenic resources is a valued part of the use; or

- Not become the dominant view but would be in view from major travel corridors along which existing scenic quality is high and/or policies have been applied to preserve and enhance aesthetic values; or
- Not become the dominant view but would be in view from locally important roads along which visual quality is not high and which have not been designated for scenic protection.

Impacts would be considered **low** where actions would:

- Be somewhat visible but not obtrusive in the view; or
- Be seen by few sensitive viewers because facilities are screened, or predominantly viewed in the middleground and background of the view.

No impact would occur if:

- The facilities would be isolated, screened, not noticed in the view, or seen from a distance greater than three miles; or
- No visually sensitive resources would be affected.

4.8.2 Summary of Impacts from the Proposed Project

Table 4-6 summarizes potential impacts to visual resources within the analysis area. More information is also in Appendix B.

	Level of Impact				
Visual Resource	BPA Action Alts.	Klondike III	Biglow Canyon		
General Project Vicinity	Moderate	Moderate to High	Moderate to High		
Columbia River Gorge National Scenic Area	Low to None	Low to None	Low to None		
John Day River Canyon	None	Low to Moderate	Low to Moderate		
Oregon National Historic Trail High Potential Sites:					
Fourmile Canyon	None	None	None		
John Day River Crossing (a.k.a. McDonald Ferry)	None	Low to Moderate	None		
Biggs Junction	None	None	None		
Deschutes River Crossing	None	None	None		
The Dalles Complex	None	None	None		
Lower Deschutes River Canyon	None	None	Low to None		
Lower Klickitat River Canyon	None	None	None		
Journey Through Time Scenic Byway	Low	Low to Moderate	Low to Moderate		

Table 4-6 Summary of Impacts to Visual Resources within the Analysis Area

4.8.3 BPA Proposed Action

4.8.3.1 Impacts

Residential Areas

The Proposed Action would be visible from residences in the analysis area at distances ranging from the near foreground (less than 1,000 feet) to the distant background (greater than 20 miles) <u>(see Maps 8 and 9)</u>. However, the local project vicinity includes few residences or other sensitive viewers, lacks KVAs, and lacks important visual resources with the exception of the John Day River Canyon.

The Proposed Action would result in moderate impacts because the transmission lines, towers, and substation facilities generally would be clearly visible in the view but would not be the dominant feature of the view.

Recreation Areas

Columbia River Gorge National Scenic Area

Portions of the Proposed Action would potentially be visible from the CRGNSA, although opportunities for viewing would be very limited. The proposed facility would be subordinate to the landscape setting that typically includes substantial human development such as interstate and rail transportation corridors, transmission lines, and urban and rural development in the foreground, middle ground, and background. Attenuating climatic conditions such as distance, haze, humidity, weather, or background landscape would further reduce visibility.

Impacts to the CRGNSA would be low to none because the proposed facility would be somewhat visible, but not obtrusive; would be seen by few sensitive viewers in the background; and would be seen from a distance of greater than 3 miles.

John Day River Canyon

The BLM administers the majority of public lands within the John Day River Canyon and has indicated that its concern would be visual impacts seen from the John Day River (Mottl, H., 2005a). The Proposed Action may be visible from higher portions of the John Day River Canyon (i.e., near the canyon rim), but it would not be visible from the river.

No impacts would occur to the John Day River Canyon because the Proposed Action would not be seen from the river.

Oregon National Historic Trail

The proposed transmission line would cross the trail alignment in areas where previous agricultural activities have destroyed any evidence of the trail. The proposed facility would not be visible at Fourmile Canyon, Biggs Junction, the Deschutes River Crossing, McDonald Ferry, or The Dalles Complex. Therefore, there would be no impact to those resources.

Lower Deschutes River Canyon

The Proposed Action would not be visible from the Lower Deschutes River Canyon. Therefore, there would be no impact to that resource.

Lower Klickitat River Canyon

The Proposed Action would not be visible from the Lower Klickitat River Canyon. Therefore, there would be no impact to that resource.

Transportation Facilities

Journey Through Time Scenic Byway

Portions of the Proposed Action would likely be visible from the Byway. However, the proposed facility would be compatible with the Journey Through Time Management Plan's stated goals. The communities of Wasco and Moro have no stated scenic or visual management goals or objectives and the Sherman County Comp Plan Goal XVIII supports the development of wind energy (Sherman County, 2003c).

The Proposed Action would have low impacts on the Journey Through Time Scenic Byway because it would be somewhat visible but not obtrusive in the view and would be seen by few sensitive viewers because facilities are screened, or predominantly viewed in the middleground and background of the view.

The Proposed Action would be visible in the middleground and background from portions of US 97 in Oregon and SR-14 in Washington. The Proposed Action would have low impacts on motorists who used these roads because it would be somewhat visible but not obtrusive in the view and would be seen by few sensitive viewers because facilities are screened, or predominantly viewed in the middleground and background of the view.

The Proposed Action would result in moderate impacts to local roads because the transmission lines, towers, and substation facilities generally would be clearly visible in the view but would not be the dominant feature of the view.

4.8.3.2 Mitigation Measures

Impacts to the general project vicinity would be moderate, but would be compatible with applicable management plans and land use policies. Impacts to important visual resources would be low to none and would also be compatible with applicable management plans and land use policies. Therefore, mitigation would not be required. However, the following measures would be implemented to further reduce potential impacts.

- Use of steel tubes (vs. steel lattice) for towers to the extent possible.
- Use of non-reflective gray paint on tower structures.
- Use of non-specular conductors (i.e., a conductor that has been modified to reduce the amount of reflected light from its surface).

4.8.4 Middle Alternative

4.8.4.1 Impacts

Impacts would be the same for the Middle Alternative as for the Proposed Action.

4.8.4.2 Mitigation Measures

Mitigation measures would be the same as for the Proposed Action.

4.8.5 Klondike III Wind Project

4.8.5.1 Impacts

Residential Areas

The Proposed Action would be visible from many locations in the analysis area at distances ranging from the immediate foreground (less than 100 feet) to the distant background (greater than 20 miles) (see Maps 8 and 9). The proposed facility would be highly visible in the foreground and middleground from local residences.

The facility would result in moderate to high impacts because the turbines and associated facilities (e.g., O&M building, roads, substation) would become the dominant feature or focal point of the view and would be clearly visible. The general project vicinity includes few sensitive viewers, lacks KVAs, and lacks important visual resources with the exception of the John Day River Canyon.

Recreation Areas

Columbia River Gorge National Scenic Area

Portions of the proposed facility would potentially be visible from the CRGNSA. Effects would be viewed at such great distances (about 9 miles or more) that impacts, if any, would be low. Almost without exception, topography or vegetation would screen the proposed facility from view. Opportunities to view the proposed facility are also minimal. In those areas where the proposed facility would be visible, it would be subordinate to the landscape setting that typically includes substantial human development such as interstate and rail transportation corridors, transmission line corridors, and urban and rural development in the foreground and middle ground. Impacts to the CRGNSA would be low to none because the proposed facility would be somewhat visible, but not obtrusive; would be seen by few sensitive viewers in the background; and would be seen from a distance of more than 3 miles.

John Day River Canyon

The BLM administers the majority of public lands within the John Day Canyon and has indicated that its concern would be visual impacts seen from the John Day River (Mottl, H., 2005a). Therefore, the following assessment keys on impacts to the river and its shoreline and does not consider impacts to the canyon walls that have very limited access.

Portions of the proposed facility would be visible from two river segments: one near McDonald Ferry, the other between approximate river miles 15.9 and 16.8. From the vicinity of McDonald Ferry, the blade tips of three turbines would be visible. The nacelle and blades of a fourth turbine would also be visible. The turbines would not be visible from the nearby BLM interpretive facility for the Historic Oregon Trail or its access road. Viewing opportunities for boaters would be limited to about 1.5 minutes. The blade tips of six turbines would be visible at different times for different durations through the segment between river miles 15.9 and 16.8. Most turbines would be limited to about 14 minutes. In many cases, the turbines' silhouettes would be barely discernible, if at all.

The turbines would appear small in scale in the background compared to other human development impacts in the canyon (e.g., irrigated pasture, farm and irrigation equipment, farm houses, trailers, fences, livestock, power lines) that are visible in the foreground and middle ground from the river. Other factors contributing to the minimal contrast of the proposed facility include viewing distance, angle of observation, light conditions, and atmospheric conditions, which have the effect of making the turbines less visible when the sun is in the west or when views are obscured by precipitation, haze, dust, smoke, or fog.

Impacts would be compatible with BLM's VRM Class II management objective: "management activities resulting in changes to the existing character of the landscape may be allowed, provided they do not attract the attention of the casual observer" (BLM, 2000).

Impacts resulting from the proposed facility would be low to moderate because the proposed facility:

- would not become the dominant view but would be in view from parks, recreation facilities, public trails, public lands and waters used for dispersed recreation where the appreciation of natural and scenic resources is a valued part of the use;
- would be somewhat visible but not obtrusive in the view; and
- would be seen by few sensitive viewers because facility would be substantially screened by existing topography.

Oregon National Historic Trail

The proposed facility would not be visible at Fourmile Canyon, Biggs Junction, the Deschutes River Crossing, and The Dalles Complex. Therefore, there would be no impacts to those resources.

Portions of four turbines would be visible from the John Day River and small portions of its banks at McDonald Ferry as described above. Impacts would be the same as described above, that is, while portions of the proposed facility would be visible, turbines would appear small in scale and in the background compared to other human developments.

Lower Deschutes River Canyon

The proposed facility would not be visible from the Lower Deschutes River Canyon. Therefore, there would be no impact to that resource.

Lower Klickitat River Canyon

The proposed facility would not be visible from the Lower Klickitat River Canyon. Therefore, there would be no impact to that resource.

Transportation

Journey Through Time Scenic Byway

Portions of the proposed facility would be visible from and would be compatible with the Journey Through Time Scenic Byway stated goals. Topography and vegetation would substantially block views in the foreground and middle ground, though several turbines would be partially visible in the middle ground.

The proposed facility would have low to moderate impacts on the Journey Through Time Scenic Byway because portions of the project:

- would be visible in the view but not the dominant feature of the view;
- would not become the dominant view but would be in view from locally important roads along which visual quality is not high and which have not been designated for scenic protection;
- would be somewhat visible but not obtrusive in the view; and
- would be seen by few sensitive viewers because facilities are screened, or predominantly viewed in the middle ground and background of the view.

The proposed facility would be visible in the middle ground and background from portions of US 97 in Oregon and SR-14 in Washington. The proposed facility would have low impacts on these roads because it would be somewhat visible but not obtrusive in the view and would be seen by few sensitive viewers because facilities (turbines and towers) would be screened by topography, or predominantly viewed in the middle ground and background of the view.

The proposed facility would be highly visible in the foreground from local roads and would result in moderate to high impacts because the turbines and related facilities (e.g., roads, substations, O&M building) would become the dominant feature or focal point of the view, or would be clearly visible in the view but not the dominant feature of the view. The local project vicinity includes few sensitive viewers, lacks KVAs, and lacks important visual resources, with the exception of the John Day River Canyon.

4.8.5.2 Mitigation Measures

Impacts to residential areas would be moderate to high, but would be compatible with applicable management plans and local land use policies. Therefore, mitigation would not be required.

Impacts to the John Day River Canyon, including McDonald Ferry, would be low to moderate. Since the proposed facility would be compatible with applicable management plans and local land use policies, mitigation would not be required.

Impacts to other recreation areas would be low to none, so mitigation would not be required.

Impacts to the Journey Through Time Scenic Byway (US 97 in Oregon) would be low to moderate. Since the proposed facility would be compatible with applicable management plans and local land use policies, mitigation would not be required.

Impacts to other transportation facilities (e.g., local roads, SR-14, and US 97 in Washington) would be low to high, and would be compatible with applicable management plans and local land use policies. Therefore, mitigation would not be required.

Although mitigation would not be required, the following measures would be implemented to reduce potential impacts:

- Implementation of active dust suppression measures during the construction period to minimize the creation of fugitive dust clouds.
- Use of wind turbine towers, nacelles, and rotors that are locally uniform and that conform to high standards of industrial design to present a trim, uncluttered, aesthetic appearance.
- Use of low-reflectivity, neutral gray, white, off-white, or earth tone finishes for the towers, nacelles, and rotors to minimize contrast with the sky backdrop and to minimize the reflections that can call attention to structures in the landscape.
- Use of neutral gray, white, off-white, or earth tone finishes for the small cabinets containing pad-mounted equipment that might be located at the base of each turbine, to help the cabinets blend into the surrounding ground plane.
- Restriction of exterior lighting on the turbines to the aviation warning lights required by the FAA, which will be kept to the minimum required number and intensity to meet FAA standards.

- Placement of much of the electrical collection system underground, minimizing the system's visual impacts.
- Use of a low-reflectivity finish for the exterior of the O&M facility building to maximize its visual integration into the surrounding landscape.
- Restriction of outdoor night lighting at the O&M facility and the substation to the minimum required for safety and security; sensors and switches will be used to keep lighting turned off when not required, and all lights will be hooded and directed to minimize backscatter and offsite light trespass.
- Use of a low-reflectivity finish for substation equipment.
- Use of low-reflectivity insulators in the substations.
- Use of fencing with a dull finish around the substation to reduce the fence's contrast with the surroundings.

4.8.6 Biglow Canyon Wind Farm

4.8.6.1 Impacts

Residential Areas

Impacts would be the same as those described for the Klondike III Wind Farm (see Maps 8 and 9).

Recreation Areas

Columbia River Gorge National Scenic Area

Impacts would be the same as those described for the Klondike III Wind Farm.

John Day River

The proposed facility would be visible to varying degrees from sections of the BLM lands in the canyon, from the Wild and Scenic River/Oregon Scenic Waterway segment of the river, and the lands extending 0.25 mile on either side of the river. Most of the lands in this area are privately-owned ranch lands that are used for cattle grazing; transmission lines of various voltages can be seen on the hills along the edge of the canyon or crossing the canyon. Public access to these lands is very limited.

In the limited areas along the river corridor from which facility's turbines would potentially be visible, few turbines would be visible from any one point, and only the blades would likely be visible from many locations. In the places where turbines would be visible, they would appear as elements on the ridgelines in the landscape's background and would have minimal direct effect on the appearance of the walls of the canyon or the canyon floor. Although the turbines would potentially be noticeable in some of the views, because of their small numbers, their location in the background, and the viewing distance (which would range from 1 to 3.5 miles), they would not likely be dominant elements in the scene. To the extent to which they would be visible, the turbines would be subordinate elements of the view, and because views from the canyon already include views of transmission and distribution lines, the presence of the turbines would not substantially alter the existing character and quality of views from the river corridor.

The proposed facility would have moderate to low impacts because the proposed facility:

- would not become the dominant view but would be in view from public lands and waters used for dispersed recreation where the appreciation of natural and scenic resources is a valued part of the use;
- would be somewhat visible but not obtrusive in the view; and
- would be seen by few sensitive viewers because facilities would be partially screened by existing topography.

Oregon National Historic Trail

The proposed facility would not be visible from the High Potential Sites (McDonald Ferry, Fourmile Canyon, Biggs Junction, the Deschutes River Crossing, and The Dalles Complex) within the analysis area. Therefore, there would be no impacts to those resources.

Deschutes River Canyon

The proposed facility would not be visible from the areas in the Deschutes River Canyon along the Deschutes Wild and Scenic River and would be visible only from a small area of the BLM lands within and adjacent to the canyon. Because none of the BLM or private lands that lie within the canyon would be directly affected by the facility and because the facility would not be visible from the interior of the canyon, the facility would be consistent with the BLM Two Rivers Plan and with the provisions of the Wasco County and Sherman County comprehensive plans that identify the Deschutes River Canyon as an important landscape feature.

Impacts to the Deschutes River Canyon would be low to none because the proposed facility would be seen by few sensitive viewers because facilities are partially screened, or predominantly viewed in the middle ground and background of the view; and would not be noticed in the view, or seen from a distance more than 3 miles.

Lower Klickitat River Canyon

The proposed facility would not be visible from the Lower Klickitat River Canyon. Therefore, there would be no impact to that resource.

Transportation

Impacts would be the same (i.e., low to moderate) as those described for the Klondike III Wind Farm.

4.8.6.2 Mitigation Measures

Mitigation would be the same as that described for the Klondike III Wind Farm.

4.8.7 No Action Alternative

No new impacts to visual resources would occur under the No Action Alternative.

4.8.8 Cumulative Impacts

Existing and future development cumulatively increases human-made elements in the rural landscape of the region, adding vertical elements such as farm/agricultural buildings, fences, and signs to the natural terrain. Since the land in the project area is comprised mainly of agricultural uses, these human-made elements are an expected component of the rural landscape.

Cumulative impacts to visual resources potentially increase when industrial and other facilities not related to agriculture are constructed in a rural landscape. The identified cumulative projects would contribute incrementally to potential cumulative impacts on visual resources in the project vicinity. These new facilities would result in moderate to high cumulative impacts to views in the general project area, but this area includes no KVAs or important visual resources (except for the John Day River Canyon) and current viewer sensitivity is low. Cumulative impacts would likely be low to moderate to important visual resources such as the John Day River Canyon and the Journey Through Time Scenic Byway where facilities would potentially be visible in the foreground and middle ground. Cumulative impacts would likely not occur or would be low to the remaining important visual resources in the project vicinity because the cumulative projects would not be visible, or would be visible at such great distances that effects, if any, would be negligible.

Other wind projects in the region, combined with the proposed projects, could create a moderate to high impact to views of various ranges, hillsides and gorges in the region. To many viewers wind farms are a visual attraction, but this perception may diminish as they become commonplace and impact more of the landscape.

4.9 Socioeconomics

4.9.1 Impact Levels

A **positive** impact would occur when an alternative produces one or more of the following effects: provides employment, increases property values, increases tax

revenues, or creates other similar effects on the social and economic vitality of affected communities.

A **negative** impact would occur when an alternative produces one or more of the following effects: reduces employment, reduces a tax base, takes land out of production without compensation, exceeds current capacities for housing and public services, or creates other similar effects on the social and economic vitality of affected communities.

No impact would occur if employment levels, tax revenues, property values, land production, demand for housing and public services, or other similar effects remain unchanged or if impacts would be of short duration.

4.9.2 Action Alternatives

4.9.2.1 Impacts

Socioeconomic Impacts are addressed together because the BPA, Klondike III and Biglow Canyon projects could be constructed at the same time. The BPA Proposed Action and the Middle Alternative would have no discernable differences in their impact to socioeconomics in the area.

Lodging

Local labor would be hired to the extent practicable, but construction of the action alternatives would require construction workers to relocate temporarily to the area. It is likely that the two wind power projects and BPA interconnection would be constructed simultaneously, potentially requiring temporary housing for construction workers on the three projects at the same time. The Klondike III Wind Project and Biglow Canyon Wind Farm ASCs estimate that about 50 to 70 percent of construction staff would be hired from outside the area. Assuming 60 percent of the construction workforce is from outside of the area; lodging would be needed for about 250 temporary employees (30 employees for transmission and substation construction, 70 employees for Klondike III Wind Project and 150 for Biglow Canyon Wind Farm in addition to construction personnel hired locally at peak construction periods). BPA would hire contractors for constructing the transmission line and associated facilities, but would use BPA staff to build spans connecting to the substations. Because work would be temporary, most outof-town workers would not likely bring their families. Local hiring could be greater, depending on the availability of workers with appropriate skills. Additional workers might commute daily from communities outside the area (e.g., Hood River, and Klickitat County), which would lessen the impacts associated with temporary in-migration of outside workers. Local establishments would benefit from temporarily housing construction workers by increasing demand of available accommodations.

Motels, hotels, and trailer or RV parks would be the most available housing options for temporary residents. Within 30 miles, there are over 750 hotel and motel rooms in The Dalles, Moro, Rufus, Biggs, and Wasco (CH2MHill, 2005). Additional lodging may be available in communities in Washington State or in local campgrounds. Although not

all of these lodging facilities would likely be available at any given time, it is expected that there would an adequate supply to meet the needs of the anticipated number of temporary workers, which could be up to 250 people at one time, and that the proposed project would not have a negative impact.

Local Spending and Employment

Constructing the transmission line, substation, and substation expansion (not including the wind power facilities) is estimated to cost between \$40 and \$45 million. Construction activities would have short-term positive impacts on the local economy by providing construction-related employment opportunities for local residents. Local businesses would benefit from goods and services sold to construction workers.

Construction workers would likely include a mix of locally hired workers for road and turbine pad construction for the wind projects and excavation for the transmission line towers. Specialized workers would be hired for some portions of construction (e.g., substation and electrical transmission construction, turbine erection, turbine testing, etc.).

While neighboring counties would not gain revenue from the site operation through tax payments, residents from communities within those counties could be employed during the construction and/or operation. Income earned by those individuals would contribute to the local economy indirectly through local purchases. In addition, the proposed facilities would purchase goods and services from local and regional businesses, from facility maintenance services to office equipment to business services. Lease payments to local landowners would also benefit the local economy because it is likely that a portion of the lease payments would be spent in nearby communities. All of this would result in a net inflow of dollars into the local economy and would have a beneficial effect beyond that of the project employment.

An estimated 15 to 20 operational personnel would be employed at each wind facility, increasing local employment within Sherman County by 30 to 40 full-time positions. Additional staff would not be required to maintain the new substation and transmission line, although some maintenance tasks, such as vegetation removal, could be hired locally. An increase in employment opportunities would have a positive effect on the economy in Sherman County, particularly because the area has had difficulty replacing jobs lost when aluminum manufacturers closed in 2001. The wind power facilities would provide long-term employment for the life of the facility, expected to be at least 30 years.

Population

Construction would have short- and long-term positive impacts to the Sherman County population. Short-term population increases would be from construction workers temporarily relocating to the area for a portion or duration of construction. During peak construction periods when potentially all three projects would be under construction, population is estimated to increase by 220 residents. The increase in population related to construction would be temporary and would have no permanent impact because they would leave when their work is complete. Temporary population increases would have a positive impact to the local economy from the goods and services they would buy.

Permanent increases in population would be minimal, increasing slightly from operations staff moving to the area for the wind power facilities. No additional staff would be needed for the transmission lines and substation facilities. <u>PGE</u> and PPM Energy expect that about 40 percent of the O&M staff would be hired locally. The remaining 60 percent of permanent positions would be filled from outside the area, adding about 72 new residents (24 new employees x 3.00 average persons per household) to the region's population. Assuming 25 percent of new residents moved to Sherman County, Sherman County's population would increase by less than1 percent.

The area could benefit from increased population because it could increase demand for housing units in an area with high vacancy rates. It is likely that full-time, operations in-migrant employees would relocate to communities near the proposed wind power projects where sewer and water services are provided by those local jurisdictions, but some new residents could also relocate to a rural area outside of a town or city where the residences would have private wells and septic systems. Because of the high vacancy rates in Sherman County and its communities, and the small number of expected in-migrants, new residents would likely move to existing housing units that would already be connected to local utilities and would have no impact to those services.

Economic Factors

The proposed project would permanently remove some land from agricultural production, about 225 acres for the transmission line towers, substations and wind power facilities. Landowners would be compensated for impacts to their property. Wind power facility operators would lease land from landowners for each turbine site. Landowners who receive payments for permitting the location of turbines on their property would see an increase in income, having a positive impact to the local economy.

The proposed project would not have an adverse impact on economic activity in the area. Rather, revenues generated from purchases of goods and services in the local area would benefit public services, including schools and others services.

Community Values and Concerns

The public scoping process for the proposed transmission line and substation identified support and concerns for the proposed actions. Generally, comments were in support of the project. Other comments can generally be grouped into five categories: location of the transmission facilities, avoidance of populated areas and homes in rural areas, potential impacts to cultural and archeological resources, impacts to avian species, and visual impacts in the immediate vicinity of the project.

Location of the proposed transmission line was the greatest public concern. Several landowners felt that locating the transmission line along existing roads would have the

least impact on farming operations and that transmission line towers located in the middle of fields could have an adverse impact on farming operations. The Middle Alternative would generally avoid placing towers in the middle of field because it would be located along public rights-of-way or along property lines. The BPA Proposed Action would generally follow public rights-of-way, but would travel across several parcels where it turns west towards the John Day Substation, potentially having a negative impact on the landowners' ability to efficiently use their properties.

Other comments identified concerns about locating the transmission line near homes or in local communities, potential impacts to archeological and cultural resources from ground disturbing activities, and impacts to avian species. Locating the transmission facilities near populated areas, particularly Wasco, were generally in reference to alternatives considered but not advanced for further study, mainly Alternative E, which would have been located near Wasco and a new home. Other concerns about impacts to cultural and archeological resources and impacts to avian species are addressed in Sections 4.10 and 4.6, respectively.

Local and State Taxes

As with other wind power facilities in Sherman County, the proposed energy facilities would be a new source of property tax revenue to local government. Improvements would be included in local property tax valuations. Property tax increases would be paid by the landowner with funds provided by project owners. Additional property tax revenues would provide more funds for schools, roads, police, fire, and other municipal needs, which would benefit the entire community.

Income earned from leases to wind power facilities operators would be taxed as income in Oregon, which would have a positive, albeit minor, impact to state tax revenue.

4.9.2.2 Mitigation Measures

The proposed project would have no negative socioeconomic effects.

4.9.3 BPA No Action Alternative

Under the No Action Alternative, socioeconomic conditions would remain similar to those of today. Temporary and permanent employment related to the action alternatives would not occur. Landowners would not receive lease payments or have any land purchased, and Sherman County would not receive additional tax revenue.

4.9.4 Cumulative Impacts

Development of the identified cumulative projects would generally have a beneficial cumulative socioeconomic effect. In addition to providing additional property tax revenues to local economies, many of these projects would likely increase employment

in the general area, with employees hired both locally and from out of town. To the extent that out-of-town workers are hired, there are sufficient accommodations in the region for the cumulative increase in workers due to the cumulative projects.

The cumulative wind projects would require the acquisition of long-term easements and lease agreements for wind project facilities, which would result in a cumulative loss of agricultural land in Sherman County. However, this economic loss would be mitigated by payments to the landowners. The cumulative effect would benefit the local economy. Additional property tax revenues from the wind power facilities would also benefit Sherman County.

Development of the proposed projects could contribute incrementally to a positive cumulative impact on the economy in the project area from a potential reduction in unemployment, and revenues from increased spending on accommodations, goods, and services during construction. An estimated 15 to 20 operational personnel would be employed at each wind facility in addition to the eight employees at Klondike Wind Project phases I and II, increasing local employment within Sherman County by 38 to 48 full-time positions related to wind power projects.

Other proposed or planned wind projects in Sherman and other counties could also provide employment opportunities.

4.10 Cultural Resources

4.10.1 Impact Levels

- A **high** impact would occur if a resource site is within an access road, substation, tower, turbine, or other proposed facility site. Direct physical disturbance of the site is certain unless adequate avoidance measures are taken.
- A **moderate** impact would occur if a resource site is within 100 feet of the proposed disturbance area or if the site is down slope of potential disturbance. Direct physical disturbance is possible.
- A **low** impact would occur if the resource site is outside the high and moderate impact areas or is in a deep, narrow draw or canyon that may be spanned. Direct physical disturbance is unlikely. Indirect forms of disturbance could occur.
- **No** impact would occur if the proposed facility is design to avoid the resource site and any disturbance to the site.

4.10.2 BPA Proposed Action

4.10.2.1 Impacts

The archaeological survey and records review for the Proposed Action indicate that most of the previous studies and recorded sites are along the Columbia, Deschutes, and

John Day rivers, and are outside of the analysis area. Historic-period documents indicate that the Oregon Trail crossed the proposed route, but field surveys did not identify any evidence of the trail, primarily because much of the project area is cultivated or ROW and has been previously disturbed.

The two archeological sites identified within the project corridor could be affected by construction (AINW, 2005a), although the impact to those sites would depend on the specific location of transmission line towers. Because the archeological sites are small, the towers would be placed to avoid the identified resources, which would cause no impact to cultural resources.

4.10.2.2 Mitigation Measures

For both action alternatives, BPA would avoid disturbing known archaeological and historic resources. Local tribes that historically lived in the area would be consulted to identify any cultural resources to avoid.

During construction, archaeological sites and historic homesteads would be temporarily flagged in the field and on construction maps before and during construction. If necessary, archaeological construction monitors would be present during construction in selected locations to prevent accidental damage to identified cultural resources, as well as cultural resources that may exist in portions of the project area identified by the tribes through consultation.

In the event that undiscovered archaeological sites are inadvertently disturbed during construction, construction work would be halted at the site until an archaeologist or cultural resource specialist could assess the site and determine appropriate mitigation measures.

4.10.3 BPA Middle Alternative

4.10.3.1 Impacts

As with the Proposed Action, the archaeological survey and records review for the Middle Alternative indicate that most of the previous studies and recorded sites are along the Columbia, Deschutes, and John Day rivers, and are outside of the analysis area. Historic-period documents indicate that the Oregon Trail crossed the Middle Alternative route. The portion of the Middle Alternative that would cross the Oregon Trail was not surveyed because access was not granted to the private property where the route would be located. As with the Proposed Action, most of private property in the area is cultivated and the surface is disturbed from farming activities. It is likely that no evidence of the trail remains, although if this alternative were chosen, additional surveys would be required to identify any evidence of intact trail segments.

The two archaeological sites identified within the project corridor could be affected by the construction (AINW, 2005a), although as with the Proposed Action, the impact to those sites would depend on the specific locations of transmission line towers. It is the general policy of the Oregon SHPO that archaeological isolates are not significant resources and are not eligible for listing in the NRHP. These isolates would not be considered significant resources (AINW, 2005a). Because the archeological sites are small, it is likely that the towers could be placed to avoid the identified resources. Because the entire length of the Middle Alternative was not surveyed, other archeological sites could exist within the Middle Alternative corridor.

4.10.3.2 Mitigation Measures

Mitigation measures would be the same as for the BPA Proposed Action.

4.10.4 Klondike III Wind Project

4.10.4.1 Impacts

<u>Three additional potential historic or prehistoric archaeological resources have been</u> <u>identified within the Klondike III project area since the DEIS was published</u> (Archaeological Investigations Northwest, Inc. 2006).

Additional surveys or testing has been recommended by the consulting archaeologist to determine the significance of these resources. If any of the resources is determined to be significant, they will be avoided, by rerouting any linear feature (e.g., collector lines), or selecting a different location for the future O&M building. Therefore, no impact is anticipated to cultural resources from this project.

Despite the lack of physical evidence for the Oregon Trail within the Klondike III Wind Project site boundary, the trail alignment has been recognized at both federal and state levels. Any intact segments are highly likely to be eligible for listing on the NRHP and would also likely be eligible for designation as a National Historic Landmark. Due to the importance of the trail, construction of the Klondike III Wind Project would avoid the mapped alignment of the Oregon Trail. Should intact physical evidence of the trail that is not currently recognized be observed where there is potential for adverse effects, concerted efforts would be made to avoid any disturbance to the intact segments.

Construction and operation of proposed facility is not likely to result in major adverse impacts to archaeological resources because only scattered isolates occur within the site boundary, nor is it likely to have direct effects on the Oregon Trail because no intact sections have been observed within the site boundary. The project may have adverse impact on the visual setting of the trail, which is described in Section 4.8.

4.10.4.2 Mitigation Measures

If intact trail segments are identified during construction and could not be avoided, the Klondike III Wind Project would consult with the SHPO to determine appropriate mitigation measures.

The turbine strings, particularly those in the northeastern Klondike III Wind Project area, would cross the Oregon Trail alignment. However, there are no known intact trail segments. The trail would not be visible from the five High Potential Sites identified in

the trail's management plan. However, the following mitigation measures are proposed to minimize visual effects to the rural setting of the trail alignment:

- The present setting of the Oregon Trail alignment from the John Day River Canyon to Biggs would be documented through photographs and videotape prior to construction of the Klondike III Wind Project; and
- Klondike III Wind Project would partner with the Sherman County Development League and consult with the Sherman County Historical Society to develop and enhance educational and interpretive displays and materials on the Oregon Trail at Biggs, which offers the best opportunity for visitor contact given the presence of an intact segment of the trail at Biggs and the proximity to I-84.

Archaeological sites and historic homesteads would be temporarily flagged in the field and on construction maps before and during construction. If necessary, archaeological construction monitors would be present during construction in selected locations to prevent accidental damage to identified cultural resources, as well as cultural resources that may exist in portions of the project area identified by the tribes through consultation.

In the event that undiscovered archaeological sites are inadvertently disturbed during construction, construction work would be halted at the site until an archaeologist or cultural resource specialist could assess the site and determine appropriate mitigation measures.

4.10.5 Biglow Canyon Wind Farm

4.10.5.1 Impacts

None of the properties identified within the project boundaries of the Biglow Canyon Wind Farm are believed to be eligible for listing on the NRHP. Homestead A, described in Section 3.10.3, could be directly affected by construction of the proposed facility, but the property is not an eligible resource and impacts would not be significant (CH2MHill, 2005). All other cultural resources would be avoided during construction, operation, and retirement of the proposed facility.

A Cultural Resource Management Plan has been developed for the proposed facility in coordination with the Oregon SHPO. The management plan includes specific protocols and procedures for protecting identified cultural resources, as well as any additional sites discovered during construction.

4.10.5.2 Mitigation Measures

During construction, archaeological sites and historic homesteads would be temporarily flagged in the field and on construction maps before and during construction. If necessary, archaeological construction monitors would be present during construction in selected locations to prevent accidental damage to identified cultural resources, as well as cultural resources that may exist in portions of the project area identified by the tribes through consultation.

In the event that undiscovered archaeological sites are inadvertently disturbed during construction, construction work would be halted at the site until an archaeologist or cultural resource specialist can assess the site and appropriate mitigation measures be completed.

4.10.6 BPA No Action Alternative

Under the BPA No Action Alternative, no historic or cultural resources would be affected.

4.10.7 Cumulative Impacts

Cultural resources in the project area have been and are being affected because of past and current development activities. Potential adverse effects on cultural resources include disturbance of cultural sites, increased likelihood of vandalism, reduction of the cultural integrity of certain sites, and increased encroachment on cultural sites. Future development could impact cultural resources if developments are not designed to avoid the resources. Cultural resource surveys and coordination with affected Tribes, as required under the National Historic Preservation Act and other environmental laws, would identify the locations of these resources so they could be avoided to the extent possible. While impacts to cultural resources from the identified cumulative projects could result in a net cumulative loss of cultural resource values in the region, implementation of mitigation programs would help reduce cumulative impacts to the extent possible.

Development of the proposed projects would contribute incrementally to these cumulative effects on cultural resources in the analysis area. No known archaeological or historic resources would be directly affected by any of the proposed projects. Visual impacts to historic resources, particularly the Oregon Trail, could occur. Cumulative impacts as they relate to visual resources are described in Section 4.8.8.

4.11 Noise, Public Health and Safety

4.11.1 Noise Levels

4.11.1.1 Construction Noise

Construction of the BPA action alternatives and the wind projects would cause localized, short-duration noise. Such temporarily increased noise levels would result from normal construction activities. Noise levels from construction activities can be expected to range from ambient to 100 dBA at a distance of 50 feet from the activities. OAR 340-035-0035(5)(g) specifically exempts construction activity from regulation. Impacts would be temporary.

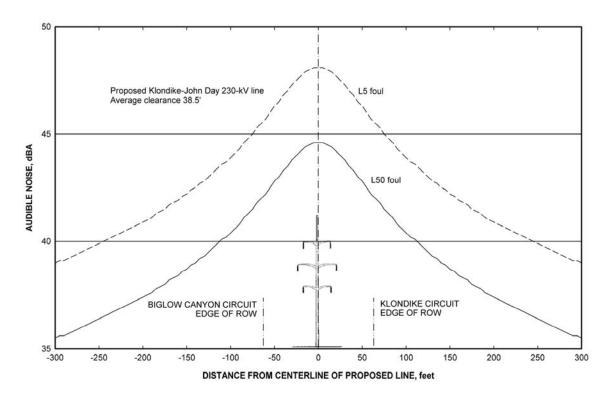
4.11.1.2 Transmission Line

Corona-generated audible noise levels were calculated for average conductor heights for fair and foul weather conditions. The predicted levels of audible noise for the proposed transmission line operated at a voltage of 237-kV are given in Table 4-7 and plotted in Figure <u>3</u>. (See Appendix C for more detail.)

The calculated median level (L $_{50}$) during foul weather at the edge of the ROW, of the proposed 230-kV transmission line ROW (62.5 feet from centerline) is 42 dBA, the calculated maximum level (L₅) during foul weather at the edge of the ROW is <u>45</u> dBA. During fair weather conditions, which occur about 94 percent of the time in the Wasco area, audible noise levels at the edge of the ROW would be about 20 dBA if corona were present. These lower levels could be masked by ambient noise on and off the ROW.

The calculated foul-weather corona noise levels for the proposed transmission line would be comparable to, or less than, those from the existing 230-kV lines in Oregon. During fair weather, noise from conductors might be perceivable on the edge of the ROW; however, beyond the ROW, it would very likely be masked or so low as to not be perceived. During foul weather, when ambient noise is higher, it is also likely that corona-generated noise off the ROW would be masked to some extent as well.





Edge of 230-kV Line Right-of-Way Audible Noise		
Descriptor	L ₅₀ , dBA	L₅, dBA
Foul weather	42	4 <u>5</u>
Fair weather	17	<u>20</u>
Note: AN levels expressed in decibels on the A-weighted scale		

Table 4-7 Predicted Audible Noise Levels at Edge of 230-kV Line ROW

(dBA). L_{50} and L_5 denote the levels exceeded 50 and 5 percent of the time, respectively.

On and off the ROW, the levels of audible noise from the proposed transmission line during foul weather would be well below the 55-dBA level that could interfere with speech outdoors. The distance to the nearest residence to the proposed line is about 0.25 miles. At this distance, the AN from the line would be about 30 dBA during foul weather, and probable not be perceived above background noise. During such periods, ambient noise levels could be increased due to wind and rain hitting foliage or buildings.

The computed annual L_{dn} level for transmission lines operating in areas with about 6 percent foul weather is about L_{dn} = L₅₀ – 3 dBA (Bracken, 1987); therefore, assuming such conditions in the area of the proposed 230-kV line, the estimated L_{dn} at the edge of the ROW would be about 39 dBA, which is well below the EPA L_{dn} guideline of 55 dBA.

Along the proposed transmission line routes there could be increases in the perceived noise above ambient levels during foul weather at the edges of the proposed 230-kV ROW. The corona–generated noise during foul weather would be masked to some extent by naturally occurring sounds such as wind and rain on foliage. During fair weather, the noise levels off the ROW from the proposed transmission line would probably not be detectable above ambient levels. The noise levels from the proposed transmission line would be below levels identified as causing interference with speech or sleep. The audible noise from the transmission line would be below EPA guidelines levels and would meet the BPA design criteria that comply with state noise regulations. Similarly the new substation would be designed and constructed to meet all federal, state and local regulations.

4.11.1.3 Substation

The proposed transformers and other equipment installed at the new John Day 230kV Substation would be specified so that BPA noise level criterion of 50 dBA for new substations would be met at the edge of the property (USDOE, 2006). This will ensure that all applicable federal, state and local regulations are met.

However, the new equipment would be placed in an environment with noise from existing transmission lines, and existing equipment in the John Day 500-kV Substation. The combined noise level from the existing and new facilities could exceed 50 dBA design levels at points on the perimeter of the expanded substation; however, the levels would be controlled to meet all applicable regulations at the edge of the property.

4.11.1.4 Wind Projects

The project vicinity is rural and existing noise levels are low with infrequent noise from agricultural activities. DEQ regulations at OAR 340-035-0035 establish noise standards at sensitive receptors. At the proposed project sites, residences are the only noise sensitive properties identified. New noise sources on sites that have not previously been used for commercial or industrial purposes have a limit on the allowable increase over existing ambient noise levels. Generally, sources on new sites may not increase the noise levels by more than 10 dBA.

Both the Klondike III Wind Project and the Biglow Canyon Wind Farm may increase the noise levels by more than 10 dBA. Oregon law allows owners of sensitive receptors to execute a noise easement with the industrial facility to legally exceed this standard, provided some benefit accrues to the property owner. Both wind projects <u>have obtained</u> noise easements from owners of property that might experience noise over the 10 dBA standard.

4.11.2 Electric and Magnetic Field Effects

Electric and magnetic fields from the proposed transmission line have been characterized using well-known techniques accepted within the scientific and engineering community. The expected electric-field levels from the proposed transmission line at minimum design clearance would be comparable to those from existing 230-kV lines in Oregon, and elsewhere. The expected magnetic-field levels from the proposed transmission line would be comparable to those from other 230-kV lines in Oregon and elsewhere. See Appendix D for more information about research regarding effects of EMF.

4.11.2.1 Transmission Line Calculated Values for Electric Fields

The peak electric field expected under the proposed transmission line would be 2.5 kV/m; the maximum value at the edge of the ROW would be about 0.3 kV/m. Clearances at road crossings would be increased to reduce the peak electric field to 0.5 kV/m or less. The electric field from the proposed line would meet regulatory limits for public exposure in Oregon and all other states that have limits and would meet the regulatory limits or guidelines for peak fields established by national and international guidelines setting organizations.

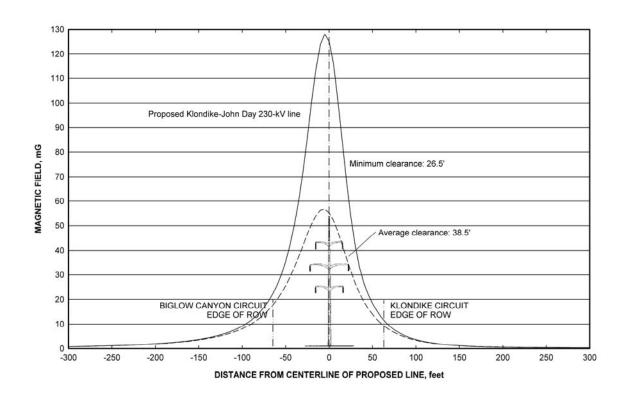
Short-term effects from transmission line fields are well understood and can be mitigated. Nuisance shocks arising from electric-field induced currents and voltages could be perceived on the ROW of the proposed transmission line. To mitigate these effects it is common practice to ground permanent conducting objects during and after construction to guard against such occurrences.

4.11.2.2 Transmission Line Calculated Values for Magnetic Fields

The magnetic fields from the proposed transmission line would be within regulatory limits of the two states that have established them and would be within guidelines for public exposure established by the ICNIRP and IEEE.

Under maximum current conditions on both circuits, the maximum magnetic fields under the proposed transmission line would be <u>132</u> mG; at the edge of the ROW of the proposed transmission line the maximum magnetic field would be <u>25</u> mG (see Figure <u>4</u>). With only the Biglow Canyon circuit loaded to maximum current levels, the magnetic fields would increase to a maximum of 150 mG on the ROW and 44 mG along the ROW edge. Over a year, the magnetic field levels would average about 30 percent of the above levels, due to the intermittent nature of the wind resource.

Figure <u>4</u> Magnetic-field Profiles for the Proposed Transmission Line Under Maximum Current Conditions.



4.11.2.3 Wind Project Collectors

The wind projects would use 34.5-kV collectors to collect power from the wind turbines. Klondike III's circuits would all be below ground; Biglow Canyon would use above ground and below ground collectors. Above ground circuits emit electric fields and are measurable at the ground; however, buried cables, buried at a depth of 4 feet, emit no electric fields since the electric field is contained within the buried cables.

The voltage, and therefore the electric field, around a conductor, remains practically steady and is not affected by the common daily and seasonal fluctuations in usage of electricity by customers. Electric fields are inversely proportional to the distance a sensor (such as a person) is from the conductors, so that the electric field strength declines as the distance from the conductor increases. The strength of the field (measured in units of kilovolts per meter [kV/m]) at any location depends on the voltage of the conductor, the geometry of the construction, the degree of the cancellation from other conductors, and the distance of the conductors. The maximum electric field under Biglow Canyon's overhead 34.5-kV distribution line would be less than 1 kV/m (CH2MHill, 2005).

Maximum magnetic fields are measured at 1 meter above the ground. Both buried cables and overhead conductors emit magnetic fields. The maximum magnetic field values for the underground circuits occur directly over the buried cable of an isolated circuit, and would be 62.9 mG for the Biglow Canyon project and 41.1 mG for the Klondike III project (DEA, 2005). The maximum magnetic field values for the overhead circuits would be directly under the circuits and would amount to 144.6 mG for Biglow Canyon (CH2MHill, 2005).

4.11.3 Toxic and Hazardous Substances

4.11.3.1 BPA Construction

Several common construction materials (e.g., concrete, paint, and wood preservatives) and petroleum products (e.g., fuels, lubricants, and hydraulic fluids) would be used during construction. BPA would follow strict procedures for disposal of these or any other hazardous materials. A spill response plan would be in place and any spills would be contained and contaminated materials disposed of properly. **No** impacts would occur.

4.11.3.2 Mitigation

BPA would develop and implement a Spill Prevention and Contingency Plan to minimize the potential for spills of hazardous material including provisions for storage of hazardous materials and refueling of construction equipment outside of riparian zones.

4.11.3.3 Wind Projects

Hazardous materials would be used in a manner that is protective of human health and the environment and would comply with all applicable federal, state and local environmental laws and regulations. Accidental releases of hazardous materials (e.g., vehicle fuels during construction/maintenance or lubricating oils for the turbines) would be prevented or minimized through proper containment of these substances during transportation and use. Any oily waste, rags or dirty or hazardous solid waste would be collected in sealable drums and either removed for recycling or properly disposed of by a licensed contractor.

4.11.3.4 Mitigation

In the unlikely event of an accidental hazardous materials release, any spill or release would be cleaned up and the contaminated soil or other materials properly disposed of and treated according to applicable regulations. Spill kits containing items such as absorbent pads would be located on equipment and in on-site temporary storage facilities to respond to accidental spills, if any were to occur. Employees handling hazardous materials would be instructed in the proper handling and storage of these materials as well as where the on-site spill kits would be located.

4.11.4 Fire Protection – All Projects

Construction of the new transmission line, substation and wind projects would take place primarily during spring, summer, and fall. During a portion of this time, the weather could be hot and dry, with increased danger of fire. At such times the potential for fire is high; the potential would increase even more with the increased use of vehicles and other motorized equipment. The addition of construction workers in the area also would elevate the potential for fire. Restrictions on operations during fire season may limit timing of some construction activities. Operation and maintenance, including vegetation management if necessary, would involve increased activity along the line by employees and contractors, slightly increasing the potential for fire. Impacts would be low.

The North Sherman County Rural Fire Protection District has indicated that the proposed projects would not affect the department's ability to provide fire protection or ambulance service for their service areas (Thomas, 2005).

4.11.4.1 Mitigation

To minimize the potential of fires starting from construction-related activities, roads would be established prior to construction to minimize vehicle contact with dry grass; idling vehicles in grassy areas would be avoided; and open flames, such as cutting torches, would be kept away from grassy areas. Staging areas would be graveled to minimize fire potential.

BPA would take all appropriate precautions to prevent fires and follow the fire control regulations, including equipping all vehicles with basic fire-fighting equipment including extinguishers, shovels, and other equipment deemed appropriate for fighting grass fires. BPA will also develop a fire prevention and suppression plan. BPA prohibits the storage of flammable materials on the ROW. Operation and maintenance of the proposed line and substation would follow prescribed policies that minimize the potential for fire.

The proposed turbines for the wind projects have built-in equipment protection features that shut down the turbine automatically to minimize the chance of a mechanical problem causing major damage or a fire. The underground electrical collection system substantially reduces the risk of fire from short circuits caused by wildlife or weather.

The county fire department will be given a copy of the approved site plan indicating the identification number assigned to each turbine, and the location of the substation and accessory structures. The fire department will also receive any gate keys to the facility.

All on-site employees will receive annual fire prevention and response training by qualified instructors or members of the local fire department. Employees will also be required to keep all vehicles on roads and off dry grassland during the dry months of the year, unless such activities are required for emergency purposes, in which case fire precautions will be observed. Service vehicles shall be equipped with a shovel and portable fire extinguisher of a 4A5OBC or equivalent rating.

4.11.5 Radio Interference (RI) and Television Interference (TVI)

The wind projects are not expected to cause radio or TV interference.

The single 1.6-inch diameter conductor that BPA would use for the proposed 230-kV transmission line would mitigate corona generation and keep radio and television interference at acceptable levels below those of many existing 230-kV lines with smaller conductors.

Predicted EMI levels for the proposed 230-kV transmission line are comparable to, or lower than, those that already exist near 230-kV lines and no impacts of coronagenerated interference on radio, television or together receptors (such as cell phones) are anticipated. Furthermore, if interference should occur, there are various methods for correcting it, and BPA has a program for responding to legitimate complaints. Impacts would be low.

4.11.6 Sheriff Services

In the event response is required at project facilities, sheriff services can be accommodated with existing department resources. No adverse impacts to the Sheriff's Department are anticipated as a result of the proposed projects (Larhey, 2005).

4.11.7 Health Care

The proposed projects would not adversely impact medical services in the analysis area. Mid-Columbia Valley Medical Center in The Dalles would be capable of providing services for construction and operational employees in case of an emergency (Thomas, 2005).

4.11.8 Additional Health and Safety Mitigation Measures

In addition to the mitigation measures previously identified in Section 4.11, the following additional mitigation measures would help minimize the low potential health and safety risks to workers and the public for construction of the proposed transmission line:

- Prior to the start of construction, the contractor would receive environmental and safety training and prepare and submit for BPA's approval a safety plan. This plan would detail how the contractor would how they would manage hazardous materials such as fuel, oil, solvents etc., and how emergency situations would be handled. The safety plan would be kept on site at all times during construction.
- During construction, the contractor would hold meetings, as needed, to go over potential safety issues and concerns.
- At the end of each workday, the contractor and any subcontractors would secure the site to protect equipment and the general public.
- The contractor and any subcontractors would be trained in tower climbing rescue techniques, first aid including cardiopulmonary resuscitation, and safety equipment inspection.
- BPA would provide notice to the landowners and the public of construction activities.
- If implosive fittings are used to connect the conductors, BPA or the contractor would notify landowners and local government officials in advance.
- During construction activities, the contractor would follow BPA specifications for grounding fences and other objects on and near the proposed ROW.

4.11.9 No Action Alternative

Under the No Action Alterative, the proposed transmission line and wind farms would not be built and the potential health and safety risks associated with them would not occur.

4.11.10 Cumulative Impacts

The proposed projects would have no to low impacts on noise. These impacts would be localized and would not be expected to add cumulatively to noise from other cumulative projects identified in the project vicinity.

Public health and safety for the residents and visitors in the analysis area could be incrementally impacted for a short time during construction, but would not be impacted over the long term. These impacts, added to the impacts from the identified cumulative projects including current and proposed wind farms, would not be expected to strain the existing health and safety infrastructure nor greatly increase risks to local residents and visitors. Additional wind projects and other development would likely have similar low impacts in the general area.

4.12 Air Quality

4.12.1 Impact Levels

Impacts would be considered high where actions would:

- Create an effect that could not be mitigated.
- Create a widespread reduction in air quality.
- Create a probable risk to human health or safety.

Impacts would be considered moderate where actions would:

- Create an effect that could be partially mitigated.
- Create a localized reduction in air quality.
- Create a possible, but unlikely risk to human health or safety.

Impacts would be considered low where actions would:

- Create an effect that could be largely mitigated.
- Create reduced air quality confined to the site of the action or to the time of construction.
- Create insignificant or very unlikely health and safety risks.

No impact would occur if no new source of air pollutants were created.

4.12.2 Impacts from BPA's Action Alternatives and the Wind Projects

Of the six criteria air pollutants, particulate matter, or PM-10, is the main concern for the proposed transmission line, substation and wind farm facilities. PM-10 are particles with aerodynamic diameter smaller than 10 micrometers and include: "dust, dirt, soot, smoke and liquid droplets directly emitted into the air by sources such as factories, power plants, cars, construction activity, fires, and natural windblown dust" (U.S.

Environmental Protection Agency, September, 2003). PM-2.5 are "fine particles" with aerodynamic diameter smaller than 2.5 micrometers. PM-2.5 particles can be "directly emitted from sources such as forest fires or they can form when gases emitted from power plants, industry and automobiles react in the air" (U.S. Environmental Protection Agency, March 1, 2006.) The greatest potential for increased emissions in Sherman County, associated with the proposed projects, is the release of particulate matter into the air during the construction phase. However, construction may not take place simultaneously and the wind projects could be completed in phases, so a small amount of soil would be exposed at any one time.

Fugitive dust emissions would result from dust entrained during project site preparation including road building, on-site travel on unpaved surfaces, and soil disrupting operations. Wind erosion of disturbed areas would also contribute to fugitive dust.

Construction activities also temporarily generate small amounts of carbon monoxide (CO). Heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO from exhaust emissions. If construction traffic were to delay or reduce the speed of other vehicles in the area, CO emissions from traffic would increase slightly. CO emissions would be temporary and limited to the immediate area surrounding the construction site.

Wind farms help off-set the production of air pollutants and greenhouse gasses by replacing a small percentage of energy that otherwise would have to be generated, presumably, by traditional, 'dirtier' energy sources such as a gas or coal fired turbines.

Sherman County is an attainment area with the lowest total emissions of any county in Oregon. The proposed construction time varies and the projects may be completed in phases. Overall, air quality impacts would be low because impacts would occur in the short term in a very localized area, during construction only, with very unlikely health and safety risks.

Permanent operations and maintenance staff would drive to the wind projects daily, likely using gasoline- or diesel-powered vehicles that would generate CO. The exhaust from those vehicles would have almost no impact to air quality in the area considering current air quality and the small number of trips from operations and maintenance staff (15 to 20 employees) needed to operate each facility.

Operations and maintenance staff would perform periodic maintenance on the transmission line and turbines, requiring equipment to drive along gravel or dirt roads along the turbine strings. Depending on the amount of moisture within the soils, some dust could be generated. No long-term impacts are anticipated because the dust generated from those activities would be minimal, particularly when compared to the much higher levels of dust generated from ongoing farming activities in the surrounding area. CO emissions from the small number of maintenance vehicles required would also be minimal and temporary. There would be no long-term impact to air quality.

4.12.3 Mitigation Measures

There are activities that can be taken to mitigate for adverse impacts to air quality due to construction activities. BPA, and PPM and <u>PGE</u> would mitigate for dust during construction and follow all necessary local and federal requirements. <u>During days when</u> the AQI is moderate or worse, dust mitigation measures would also be used.

The following mitigation measures could be used:

- Water trucks would be used on an as-needed basis to minimize dust
- Gravel (2-3 inch) will be placed on access roads before turbine construction
- All construction vehicles will travel at low speeds to minimize dust
- Chipping or "lop and scatter" would be used to dispose of small limbs and branches. No burning will be allowed.
- All on-road vehicles will comply with Oregon State emission standards.
- Off-road vehicles would be in good running condition, minimizing their emissions.
- On-road diesel vehicles will use low sulfur fuel.
- Reseeding and revegetation will minimize exposed soil prone to erosion.

4.12.4 No Action Alternative

Under the No Action Alterative, the proposed transmission line and wind farms would not be built and the potential air quality impacts would not occur.

4.12.5 Cumulative Impacts

The primary air quality impact from the identified cumulative projects would be temporary dust emissions from construction of these projects. Whether these impacts would be cumulatively additive would depend on construction timing, the effectiveness of dust mitigation measures employed, and the distance between the projects.

If some of the cumulative projects have similar construction windows and are located in relative proximity to each other, they could have a temporary low-level impact to air quality in the immediate vicinity of the construction site(s). These impacts would be temporary and localized. With implementation of dust control mitigation measures, construction-related air quality impacts would be reduced. If the projects are completed in phases, these temporary impacts would be created over time, but would not result in long-term cumulative impacts to air quality.

BPA's Proposed Action and the wind projects would add vehicle emissions from construction equipment, as well as cars and other vehicles used by construction, operation, and maintenance staff. These emissions would contribute incrementally to cumulative impacts on air quality from vehicle emissions in the region. However, given the current excellent air quality conditions in the region and the temporary and localized effects of expected vehicle emissions related to the identified cumulative projects, this cumulative impact would be expected to be low.

4.13 Short-Term Use of the Environment and the Maintenance and Enhancement of Long-Term Productivity

The BPA action alternatives, Klondike III Wind Project, and Biglow Canyon Wind Farm would permanently remove about 17, 62, and 157 acres respectively, (236 acres total), of primarily agricultural land and temporarily disturb about 120, 250, and 393 acres, respectively, (763 acres total) of primarily agricultural land. Following construction, the 763 acres of temporarily disturbed land would be restored (e.g., regraded and replanted) to its pre-project use.

The operators of the Klondike III Wind Project and Biglow Canyon Wind Farm would be required to retire their facilities after the wind projects have ceased operation. Facility retirement would include removal and to the extent practicable, recycling of turbines, turbine pads and other equipment, and returning the land underneath to productive farmland or other habitat. Roads that are improved for the project may be removed or left in place at the request of the property owner. These actions would maintain longterm productivity of farmed lands and wildlife habitat.

4.14 Irreversible and Irretrievable Commitment of Resources

As stated above, most of the impacts to farmland and wildlife habitat would be reversed upon retirement of the projects. However, an unknown acreage of improved farm roads would be left in place at that time and these impacts would not be reversed.

The only irretrievable commitment of resources expected to result from the project is the consumption of fossil fuels during construction, operations, and maintenance of the projects.

4.15 Adverse Effects that Cannot Be Avoided

Implementation of the proposed project would result in some adverse impacts that cannot be fully avoided; many of the impacts would be temporary and others longer term. These impacts and proposed mitigation are discussed under specific resource sections earlier in this chapter. Some of the adverse effects that cannot be avoided in the proposed project include the following:

- Mortality of individual bird and bats.
- Temporary and permanent conversions of land areas to be used for structure sites, access roads, staging areas, tensioning sites, and new substations.
- Interference with farming operations.

- Temporary disturbances to motorists and residents during construction.
- Increased noise levels during construction and operation.
- Potential for health effects from magnetic fields.
- Visual impacts associated with the proposed steel poles, lattice steel towers, substation facilities, and wind turbines.
- Short-term increase in pollutant levels during construction from dust and vehicles.
- Negligible reduction in agricultural production.
- The elimination of small areas of vegetation from permanent physical developments.
- Short-term soil compaction, erosion, and vegetation degradation from construction and maintenance.
- Short-term disturbance to wildlife during construction.
- A reduction in the amount of vegetation available for wildlife habitat.

Chapter 5 - Consultation, Permit and Review Requirements

In this Chapter:

- Laws and procedures to be met
- Actions taken
- Consultations

5.1 National Environmental Policy Act

This <u>FEIS</u> was prepared by BPA pursuant to regulations implementing the National Environmental Policy Act (NEPA) (42 USC 4321 et seq.), which requires federal agencies to assess the impacts that their actions may have on the environment. BPA's proposal to construct the transmission line and substation requires that it assess the potential environmental effects of the proposed project, describe them in an EIS, make the EIS available for public comment, and consider the impacts and comments when deciding whether to proceed with the project.

5.2 Endangered and Threatened Species

The ESA (16 USC 1536) provides for the conservation of endangered and threatened species of fish, wildlife and plants. Federal agencies must ensure proposed actions do not jeopardize the continued existence of any endangered or threatened species, or cause the destruction or adverse modification of their habitat. When conducting any environmental impact analysis for specific projects, agencies must identify practicable alternatives to conserve or enhance such species.

Possible impacts of the proposed facilities to known or suspected occurrences of federal threatened or endangered species or their habitat are discussed in Chapter 4 of the <u>FEIS</u>. Bald eagles are the only federally listed species that could be affected by the proposed project.

Section 7 of the Endangered Species Act, 16 U.S.C. Section 1536(a)(2), requires all federal agencies to consult with the National Marine Fisheries Service (NMFS) for marine and anadromous species, or with the United States Fish and Wildlife Services (USFWS) for fresh-water and wildlife species, if they are proposing an action that may affect listed species or their designated habitat. Each federal agency shall insure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat.

If listed species or designated critical habitat is present and could be affected by the proposed project a *biological assessment* (BA) must be prepared to analyze the potential effects of the project on listed species and critical habitat and make an effects

determination. NMFS and/or USFWS review the BA and, if they conclude that the project may adversely affect a listed species or their habitat, issue a biological opinion, which includes a take statement and a list of reasonable and prudent alternatives to follow during construction. If NMFS and/or USFWS find that the project may affect, but is not likely to adversely affect a listed species or their habitat, they will issue a letter of concurrence.

BPA contacted the USFWS for a list of threatened and endangered species with potential to occur in the vicinity of the proposed project. The only species listed on the ESA that occurs in the project vicinity is the bald eagle. Other listed or candidate species which, as determined through further analysis, are not expected to occur in the analysis area, include the yellow-billed cuckoo and the Washington ground squirrel.

No listed species would be adversely impacted by this project and so a biological assessment is not required.

5.3 Fish and Wildlife Conservation

5.3.1 Fish and Wildlife Conservation Act

The Fish and Wildlife Conservation Act of 1980 (16 USC 2901 et seq.) encourages federal agencies to conserve and promote conservation of non-game fish and wildlife species and their habitats. In addition, the Fish and Wildlife Coordination Act (16 USC 661 et seq.) requires federal agencies undertaking projects affecting water resources to coordinate with the USFWS and the state agency responsible for fish and wildlife resources. Because the proposed project would not affect water resources, the Fish and Wildlife Coordination Act is not applicable.

Mitigation measures designed to conserve fish, wildlife and their habitat are listed in Chapter 4. Standard erosion control measures would be used during construction to control limit erosion; removal of woody vegetation would be minimized.

5.3.2 Essential Fish Habitat

Public Law 104-297, the Sustainable Fisheries Act of 1996, amended the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to establish new requirements for Essential Fish Habitat (EFH): an EFH description in federal fishery management plans, and to require federal agencies to consult with NMFS on activities that may adversely affect EFH.

There is no EFH in the analysis area.

5.3.3 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (16 USC sections 703-712, July 3, 1918, as amended 1936, 1960, 1968, 969, 1974, 1978, 1986 and 1989) implements various treaties and conventions between the United States and other countries, including Canada, Japan,

Mexico, and the former Soviet Union, for the protection of migratory birds. Under the act, taking, killing or possessing migratory birds of their eggs or nests is unlawful. Most species of birds are classified as migratory under the Act, except for upland birds such as pheasant, chukar and gray partridge.

The proposed project may impact birds, including some bird species classified as migratory under the Migratory Bird Treaty Act. Potential impacts to birds as a result of the proposed project are discussed in Section 4.6 of this EIS. In summary, bird fatalities could result from impacts with overhead ground wires during foggy conditions, from increased road traffic along access roads, and from impacts with wind turbines. Average fatality estimates for all birds from regional wind facilities have ranged from 0.9 to 2.9 birds per MW per year. Overall bird use and species richness estimated for the area was low relative to other wind facility sites in the United States, including other open habitat sites. Raptor fatality rates for the proposed project are anticipated to be low (< 0.1 per MW per year). As discussed in Chapter 4, appropriate mitigation measures have been identified to reduce impacts to birds and minimize the risk of bird mortality.

5.3.4 Bald Eagle and Golden Eagle Protection Act

The Bald Eagle Protection Act (16 USC 668-668d, June 8, 1940, as amended in 1959, 1962, 1972, and 1978) prohibits the taking of possession of and commerce in bald and golden eagles, with limited exceptions. Because a small number of bald and golden eagles may reside within foraging distance of the proposed project, there is a remote possibility some mortality could result. However, because the Act covers only intentional acts, or acts in "wanton disregard" of the safety of golden or bald eagles, this project is not viewed as subject to its compliance. See also Section 4.6 of this <u>FEIS</u>.

5.4 Heritage Conservation

The US Congress has passed many federal laws to protect the nation's cultural resources. These include the National Historic Preservation Act, the Archeological Resources Protections Act, the American Indian Religious Freedom Act, the National Landmarks Program, and the World Heritage List.

A cultural resource is an object, structure, building, site or district that provides irreplaceable evidence of natural or human history of nation, state or local significance. A cultural resource can also include traditions, beliefs, practices, lifeways, arts, crafts, and social institutions of any community, often referred to as *traditional cultural property*. Cultural resources include traditional cultural property, National Landmarks, archeological sites, and properties listed (or eligible for listing) on the NRHP.

Construction, and operation and maintenance of BPA's action alternatives could potentially affect cultural resources. A literature review of the analysis area was done to determine the prehistory and history of the area and the probability of finding cultural resources that may be affected by the project. A cultural survey of the action alternatives' rights-of-way was conducted in fall 2005. None of the previously recorded cultural resource sites occur on or near the proposed project area. None of the cultural resource isolates identified during the surveys appear to be eligible for listing on the NRHP.

If, during construction, previously unidentified cultural resources that would be affected by the proposed project are found, BPA would follow all required procedures set forth in the following regulations, laws, and guidelines: Section 106 (36 CFR Part 800) of the National Historic Preservation Act of 1969, as amended (16 USC Section 470); NEPA (42 USC Sections 4321-4327); the American Indian Religious Freedom Act of 1978 (PL 95-341; the Archaeological Resources Protection Act of 1979 (16 USC 470a-470m); and the Native American Graves Protection and Repatriation Act of 1990 (PL 101-601). See also Section 4.10.

Construction, and operation and maintenance of the wind projects could also potentially affect cultural resources. See Section 4.10.

5.5 Federal, State, Area-wide, and Local Plan and Program Consistency

The proposed transmission line and new John Day 230-kV substation would be constructed by BPA, which is a federal agency. Pursuant to the supremacy clause of the U.S. Constitution, BPA is not subject to local and state land use or building regulations, and this is not obligated to obtain state and local land use approvals or permits. BPA would, however, strive to meet or exceed the substantive standards and policies of state and local regulations.

The proposed wind projects would be required to obtain applicable state and local land use approvals and permits.

5.5.1 Federal Management Plans

5.5.1.1 Two Rivers Resource Management Plan Record of Decision (June 1986)

This plan identifies the Deschutes River and John Day River canyons as areas of high visual quality. These areas are designated as Special Management Areas. Because the proposed projects would not occur on BLM administered land, BLM management plans and policies would not apply to the transmission line routes or proposed wind power facilities.

5.5.1.2 Record of Decision John Day Proposed Management Plan, Two Rivers and John Day Resource Management Plan Amendments (February 2001)

Beginning at Tumwater Falls, near river mile 10, and upstream through the analysis area, the John Day River is designated as a National Wild and Scenic River. The Wild and Scenic designation and the management plan apply to the river itself and to the lands that lie within 0.25 to 1 mile of each bank.

Along the part of the river in the study area, there would be no change in the VRM class, which would mean that the BLM lands in the Wild and Scenic River along this segment of the river would be managed in accordance with VRM Class II standards, permitting changes to the existing character of the landscape that do not attract the attention of the casual observer. Because the area of jurisdiction of this plan is the National Wild and Scenic River, which has a variable boundary that extends only 0.25 to 1 mile on either side of the river, developments outside of the boundary, regardless of their scenic impacts, would not be regulated by this plan.

5.5.1.3 Lower Deschutes River Management Plan Record of Decision (February 1993)

The geographic jurisdiction of this plan is the lower section of the Deschutes River designated as a National Wild and Scenic River, which has a variable boundary averaging approximately 0.25 mile on either side of the river. This plan does not regulate developments outside of the boundary, regardless of scenic impacts.

5.5.1.4 Management Plan for the Columbia River Gorge National Scenic Area (September 1992, revised May 2004)

The CRGNSA consists of the 80-mile corridor extending along the Columbia River from Troutdale to the Deschutes River. The transmission line and proposed wind projects lie outside of the scenic area's eastern boundary. Four key viewing areas within the CRGNSA are located near the proposed projects: the Columbia River, the Historic Columbia River Highway, I-84, and SR-14. Management plans for the CRGNSA would not apply to the proposed BPA transmission line or wind power facilities because they are outside of the planning area boundary. No direct federal CRGNSA review of activities is required.

5.5.2 Sherman County Planning Framework

The project area is within unincorporated Sherman County, Oregon. The Sherman County Comprehensive Plan (2003a) outlines goals and policies that direct how development should occur, including energy facilities, to protect the scenic, economic, historic, and recreational qualities of the county. The most applicable goals and policies related to the project are contained in Section XV-Energy Policy I, which encourages the County to cooperate with public agencies and private individuals in the use and development of renewable resources; and Policy III, which addresses the need for high-voltage transmission lines (in excess of 230-kV) to locate within existing ROW, unless approved by the County.

Typically, Sherman County reviews wind power facilities as conditional uses, although as part of the ASC, the Oregon Department of Energy can also review the ASC based on local development standards to determine if the proposed project meets local development standards. The local planning department provides comments on the application and proposed conditions of approval, which are incorporated into the land use decision.

Because BPA is a federal agency, federal sovereignty applies, and no local permitting is required. Federal actions are exempt from the Sherman County planning process (Macnab, 2005), although BPA would comply, to the greatest extent practicable, with local land use regulations.

Section XI of the Sherman County Comprehensive Plan identifies important landscape features within the County. These include rock outcroppings, trees, and the John Day River and Deschutes River canyons. The County's Goal X is to "preserve the integrity of the Sherman County Landscape." Policy I of Goal X states "trees should be considered an important feature of the landscape and therefore the County Court shall encourage the retention of this resource when practical." Goal XII is to "provide for the rational use of all resources within the designated Deschutes and John Day Oregon State Scenic Waterways." None of the proposed actions would have a direct impact on either scenic area.

5.6 Farmland Protection

The Farmland Protection Policy Act (Public Law 97-98) (FPPA) is authorized by the NRCS. The purpose of the FPPA is to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. The FPPA attempts to ensure that federal programs are administered in a manner that, to the best extent practicable, will be compatible with state, unit of local government, and private programs and policies to protect farmland. The FPPA does not cover private construction subject to federal permitting and licensing, projects planned and completed without any assistance from a federal agency, federal projects related to national defense during a national emergency, and projects proposed on land already committed to urban development.

The FPPA designates farmland as prime, unique, of statewide importance, and of local importance. There are no unique farmland map units recognized in Sherman County (Campbell, 2006). Prime, statewide importance, and local importance are defined as:

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion, as determined by the USDA. Prime farmland also includes land that possesses the above characteristics but is being used currently to produce livestock and timber; farmland, other than prime or unique farmland, that is of statewide or local importance for the production of food, feed, fiber, forage, or oilseed crops, as determined by the use appropriate State or unit of local government agency or agencies, and that the USDA determines should be considered as farmland.

Soils in the analysis area are shown in Table 3-3 in Section 3.4. The State of Oregon rates farmland based on soil capability information produced by the NRCS. The

State considers any soil map unit in eastern Oregon in land capability class 6 or less to be farmland of statewide importance (Campbell, 2006). Within the analysis area, seven soil map units are classified as farmland of statewide importance and seven soil map units as prime farmland only if irrigated. The irrigated land that would be impacted by the proposed project is not one of the soil units considered prime farmland if irrigated.

Sherman County does not consider any soils map unit within the county as highvalue farmland, although because federal funds would be used to construct the transmission line and substation, and because the NRCS and State of Oregon have designated high-value farmland that would be converted to other uses, BPA completed and submitted the Farmland Conversion Impact Rating AD-1006 to NRCS. NRCS determined that both action alternatives would affect a similar amount of soils considered prime, unique, statewide or locally important farmland. BPA determined that the proposed project would minimize conversion of farmland by permitting existing farming practices to continue within the transmission line ROW and would be consistent with the FPPA. See Sections 3.1, Land Use, and 3.4, Geology and Soils, for a description of agricultural practices in the analysis area.

5.7 Recreation Resources

5.7.1 Federal

Guidance provided by the United States Department of the Interior regarding Federal Wild and Scenic Rivers states "management principles may apply to private lands only to the extent required by other laws such as local zoning and air and water pollution regulations" (Federal Register, 1982). The proposed facility is outside the Federal Wild and Scenic Rivers Act's jurisdiction because the site boundary is beyond the designated Wild and Scenic River corridor and because the Sherman County Comprehensive Plan does not place additional restrictions on development relevant to the Wild and Scenic River designation.

5.7.2 State of Oregon

The Oregon State Scenic Waterways Act also does not govern the facilities, because they would be located beyond the Act's jurisdiction, which extends to all land within 0.25 mile of the bank on each side of the scenic waterway. ORS 390.805(1), 390.845(2)(e); see also OAR 736-040-0015(5) and (10).

The proposed facilities would not be visible from state parks within the analysis area.

5.8 Floodplain/Wetlands Assessment

In accordance with USDOE regulations on compliance with Floodplains/Wetlands environmental review requirements (10 CFR 1022.12), and Executive Orders

(EOs) 11988 and 11990, BPA has prepared the following assessment of the impacts of the alternatives on floodplains and wetlands.

5.8.1 **Project Description**

The analysis area lies in an arid climate; waterways and wetlands are rare. All transmission and wind turbine towers and substation facilities can be located to avoid waters of the US. Linear features, such as roads and underground transmission systems, cannot always avoid these features.

5.8.2 Floodplain/Wetlands Effects

The project would not impact any floodplain or wetlands.

5.8.3 Alternatives

Both BPA action alternatives and the No Action Alternative would have no impacts to waters of the US.

5.8.4 Mitigation

Mitigation for the proposed impacts includes seeding and planting a 2,000-squarefoot area adjacent to one of the intermittent drainages.

5.9 Executive Order on Environmental Justice

Executive Order (EO) 12898 on Environmental Justice requires agencies undertaking federal projects to evaluate whether any adverse human health or environmental impacts of the proposed project would fall disproportionately on lowincome or minority populations in the analysis area, and ensures outreach to and involvement of minority and low-income communities in the decision-making process.

An important component of EO 12898 is assuring that all portions of the population have a meaningful opportunity to participate in the development of federal projects regardless of race, color, national origin, or income. Council on Environmental Quality guidance states that agencies should acknowledge and seek to overcome linguistic, institutional, geographic, and other barriers to meaningful participation, and should incorporate active outreach to affected groups. The public involvement process is described in Section 1.3, Scoping and Major Issues. <u>A public meeting was held during the public comment period for the DEIS</u>. <u>Copies of this FEIS</u> will be sent to the interested parties listed in Chapter 7.

US Census information from 2000 was used to identify potential impacts. None of the action alternatives would have a disproportionate adverse impact on minority or low-

income populations. No displacements would occur as a result of the action alternatives and construction would generally be located outside of any population centers.

5.10 Global Warming

The mass transfer or carbon from the earth to the atmosphere and back again is called the carbon cycle. The atmosphere, plants, oceans, rocks and sediments act as reservoirs for carbon. Since industrial times, this carbon balance has been upset because of fossil fuel consumption and timber harvesting, and there has been a dramatic increase in the amount of carbon dioxide in the earth's atmosphere. Because carbon dioxide is a greenhouse gas, its increasing atmospheric concentration is thought to contribute to global warming.

The project would enable construction and operation of about 700 MW of wind power generating capacity. Wind power technology does not emit greenhouse gasses, except in the manufacture of the equipment and during construction. No removal of woody vegetation would occur. All areas cleared for construction would be revegetated.

5.11 Energy Conservation at Federal Facilities

No new buildings would be installed at BPA substations other than control houses. The building designs for the control houses would meet federal energy conservation design standards.

5.12 Pollution Control at Federal Facilities

There are two pollution control acts that apply to this project:

Resource Conservation and Recovery Act (RCRA) - The Resource Conservation and Recovery Act, as amended, is designed to provide a program for managing and controlling hazardous waste by imposing requirements on generators and transporters of this waste, and on owners and operators of treatment, storage and disposal (TSD) facilities. Each TSD facility owner or operator is required to have a permit issued by EPA or the state.

Typical construction and maintenance activities in BPA's experience have generated small amounts of these hazardous wastes: solvents, pesticides, paint products, motor and lubricating oils and cleaners. Small amounts of hazardous wastes may be generated by the project. These materials would be disposed of according to state law and RCRA.

Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) - This Act registers and regulates pesticides. BPA uses herbicides only under controlled circumstances. Herbicides are used on transmission line rights-of-way and in substation yards to control vegetation, including noxious weeds.

When BPA uses herbicides, the date, dose and chemical used is recorded and reported to state government officials, as required by state law. Herbicide containers are disposed of according to RCRA standards. And any herbicides used on private land, would only be done so with the knowledge and permission of the landowner.

Noise Control Act - The federal Noise Control Act of 1972 (42 USC 4903) requires that federal entities, such as BPA, comply with state and local noise requirements.

As discussed in Section 4.11, the calculated median level (L_{50}) during foul weather at the edge of the ROW would be about 4<u>5</u> dBA, below the BPA transmission line design criteria for corona-generated audible noise which is 50 dBA at the edge of the ROW. During fair weather conditions, which occur about 94 percent of the time, audible noise levels at the edge of the ROW would be about 20 dBA if corona were present. The lower levels would likely be masked by ambient noise (such as wind or traffic noise) on and off the ROW.

The 45 dBA level would meet the Oregon Administrative Code limit for transmission lines.

5.13 Emission Permits under the Clean Air Act

DEQ and local air pollution monitoring agencies operate air quality monitors in Portland, Salem, Eugene and Medford, Oregon. Air pollution can be from one or a number of sources (e.g., vehicle emissions, industry, and natural occurrences, such as blowing dust). DEQ has authority to designate nonattainment or maintenance areas where emissions exceed US Environmental Protection Agency (EPA) air quality standards. Nonattainment areas are geographic areas that have not consistently met the NAAQS. Maintenance areas are geographic areas that have had a history of nonattainment but now consistently meet the NAAQS.

No emission permits would be required for the proposed project. Any impacts to air quality would be short-term and construction-related. There are no identified air quality problems in the analysis area, which is in attainment for all NAAQS.

5.14 Discharge Permits under the Clean Water Act

The Clean Water Act regulates discharges in to waters of the US.

Section 401 – Section 401 of the Clean Water Act, the State Water Quality Certification program, requires that states certify compliance of federal permits and licensees with state water quality requirements.

Section 402 – This section authorizes storm water discharges associated with construction activities greater than 1 acre. For Oregon, DEQ has a general permit authorizing entities to do construction projects, provided appropriate erosion control measures are implemented.

Section 404 – Authorization for the US Army Corps of Engineers is required when there is a discharge of dredge materials or fill material into waters of the US, including wetlands.

The BPA action alternatives, the Klondike III Wind Project, and the Biglow Canyon Wind Farm would each result in disturbance of more than 1 acre of land, and a general permit for storm water discharges associated with construction activities will be obtained from DEQ.

Waters of the US could potentially be impacted by one of the wind power projects. The Biglow Canyon Wind Farm project would impact 0.02 acre of intermittent streams, which are jurisdictional waters of the US. A Corps permit is required under Section 404 of the Clean Water Act for these impacts. <u>PGE</u> will apply for the permit.

5.15 Underground Injection Permits under the Safe Drinking Water Act

No underground injection permits would be needed.

5.16 Notice to the Federal Aviation Administration

As part of transmission line design, BPA seeks to comply with FAA procedures. Final locations of structures, structure types, and structure heights are submitted to FAA for the project. The information includes identifying structures tall than 200 feet above ground, and listing all structures within prescribed distances of airports listed in the FAA airport directory. BPA also assists the FAA in field review of the project by identifying structure locations. The FAA then conducts its own study of the project and makes recommendation to BPA for airway marking and lighting. General BPA policy is to follow FAA recommendations.

Because of the size of the wind turbines, the FAA may require aviation warning lights on some turbines. The number of turbines with lights and the lighting pattern of the turbines would be determined in consultation with the FAA.

Chapter 6 - EIS Preparers

Kathleen Concannon, Assistant Environmental Coordinator, Concannon Creative Services. Responsible for various aspects of the environmental process including analysis and document preparation. Education: B.S. Earth Sciences. Experience: Environmental analysis, resource planning and NEPA review. With BPA from 1979 to 1990, providing contract services to the agency since that time.

Doug Corkran, Writer/editor and Fish and Wildlife Biologist. Responsible for editing various sections of the EIS and overseeing the fish and wildlife sections. Education: MA Environmental Planning, BA, Biology. Experience: Fish and wildlife biology, NEPA compliance, ESA compliance; with BPA since 2005.

Alex Dupey, AICP, Planner, David Evans and Associates, Inc.. Responsible for Land Use, Transportation, Recreation, Socioeconomics, Air Quality, FFPA, and Environmental Justice. Education: Master of Community and Regional Planning. Experience: Land use and environmental planning, with DEA since 2000.

David Ellis, Archeologist, Archaeological Investigations Northwest Inc. Responsible for Cultural Resources. Education: B.A. Anthropology, Master of Public Administration. Experience: Field Archaeology; with AINW since 1990.

Gene Lynard, Senior Environmental Specialist, Project Environmental Lead. Responsible for providing environmental clearance on the proposed action. Education: B.A., Geography, Master of City and Regional Planning. Experience: Environmental planning and real estate development economics in private and public sectors; with BPA as a contractor and employee since 1984.

Kristina Gifford McKenzie, Planner, David Evans and Associates, Inc. Responsible for Alternatives (Klondike III and Biglow Canyon wind projects), and document quality review. Education: B.A. Communications; Master of Urban and Regional Planning. Experience: Land use planning, environmental analysis and NEPA review; with DEA since 1990.

Philip Rickus, Biologist, David Evans and Associates, Inc.. Responsible for Fish and Wildlife, Vegetation, and Waters/Wetlands. Education: B.A. in Biology Experience: Field biology: with DEA since 1999.

Dana Siegfried, Project Manager, David Evans and Associates, Inc. Responsible for overall EIS preparation, staffing, and project management. Education: B.S. Zoology, M.S. Marine Resource Management. Experience: Environmental regulations and permitting; with DEA since 1998.

Sean Sullivan, Landscape Architect (OR No. 412), David Evans and Associates, Inc. Responsible for Scenic Resources and Geology. Education: Bachelor of Landscape Architecture; Master of Landscape Architecture. Experience: Aesthetic and recreation resource assessment, visual and environmental mitigation design, visual simulations, and ecological restoration; with DEA since 1996.

Aaron Turecek, GIS Specialist, David Evans and Associates, Inc. Responsible for mapping and graphics. Education: B.A. Geological Science; Experience: applying GIS

and remote sensing technology to natural resource management projects in the Pacific Northwest; with DEA since 2000.

Doug Wittren, GIS Specialist, Bonneville Power Administration. Responsible for spatial data coordination, analysis and mapping products. Education: M.S., B.S. Earth Sciences (Geography emphasis). With BPA since 1992 producing spatial technology solutions using GIS for a variety of BPA projects throughout the Northwest.

Chapter 7 - List of Agencies, Organizations, and Persons Sent the EIS

The project mailing list contains potentially interested or affected landowners; tribes; local, state and federal agencies; public officials and businesses. They have directly received or have been given instructions on how to receive all project information made available so far, and they will have an opportunity to review the Draft and Final EIS.

INDIVIDUALS

Helen Andrews **Phillip Andrews** Steve Becknet Douglas Bish Tiffini Blaylock Vera Campbell Jessie Casswell M J Clark **Donald C Coats** Kathryn Coats Joe Dabulskis Illa Jean Ellis Karen Falk Nerine Fields John & Nancy Fields Barbara Gray Les Gray **Brett Gray** Darryl Hart Gordon Hiderbrand John & Wanda Hilderbrand Roseanna Hulse Delta M Johnson Larry Edward Kasebert Steve Kaseberg

Birginia Laughlin Kevin MacIntyre Charles R and Gary J MacNab George L ad Junietta E MacNab Patrick G MacNab Peter MacNab Thomas MacNab Helen MacNab Edna & John MacNab **Carole Makinster Betsy Martin** Douglas Martin Robert Martin **Thomas & Constance Martin** William Martin DeeAnn Massie John McCoy Kevin & Kathy McCullough Richard & Jean McGregor Eugene McMillin Stephen McMillin Dick McNabb

James McNabb

Catherine Medler

Daryl Melzer

Wayne Melzer

Ernie Moore

Philip O'Meara

Forest Peters

Scott Peters

Diana Poston

Pat Powell

Betty Rathbun

Doug Reid

Christine Rice

Daniel Richelderfer

David Richelderfer

Dee Richelderfer

De'Lynn Richelderfer

Donald Richelderfer

Jon Richelderfer

Martin Richelderfer

Richard Richelderfer

Theron Richelderfer

Scott Robar

Mike Sandberg

Dana Siegfried

Grant Simpson

Nancy Simpson

Patricia Ann & Shawn Skiles

Delmar & Margaret Smith

Ray Smith

Margaret Stoltenberg

Kathleen Strege

Kent Thomas

Melva Thomas

Gary Thompson

Thomson Thomson

Arthur & Marjorie Vangilder

Raymond & Vera Vangilder

Eulalie Welk

Dora O Wright

Mary Zachariasen

Frank & Deanna Zaniker

Barnett Estate Partnership China Hollow Ranch Farm & Ranch Management Reid Ranch Simantel Farms, Rob Simantel Weedman Ranches Inc.

FEDERAL AGENCIES

Bonneville Power Administration Bureau of Land Management Department of Energy Fish and Wildlife Service

TRIBES OR TRIBAL GROUPS

Confederated Tribes of the Colville Reservation Confederated Tribes of the Umatilla Indian Reservation Confederated Tribes of Warm Springs Nez Perce Tribe Wanapum Tribe Yakama Nation

STATE AGENCIES, OREGON

Department of Fish and Wildlife Department of Agriculture Department of Transportation Department of Lands State of Oregon, Oregon Public Utility Commission

PUBLIC OFFICIALS, OREGON

Federal Congressional US House of Representatives, Greg Walden US Senate, Ron Wyden US Senate, Gordon Smith Governor, Ted Kulongoski State Senator and Representatives John H. Dallum

LOCAL GOVERNMENTS, OREGON

- City of The Dalles
- City of Moro
- City of Portland
- City of Rufus
- County of Sherman
- County of Wasco

BUSINESSES

CH2M Hill GE Energy PPM Energy Inc Stole Rives Boley LLP Wasco Electric Coop Inc West Inc Western Wind Power

INTERESTED PARTIES

Association of Oregon Counties City of Portland Office of Sustainable Development County of Sherman Department of Planning County of Sherman Weed District Michels Organization Portland Audubon Society Conservation Committee Renewable Northwest Project Sierra Club Oregon Chapter

LIBRARY

The Dalles/Wasco County Public Library

MEDIA

The Dalles Chronicle Times Journal New Editor

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Chapter 9 - Glossary and Abbreviations

9.1 Abbreviations and Acronyms

AINW	Archaeological Investigations Northwest Inc.
ASC	Application for Site Certificate
BG	Block Group (Census)
BLM	US Department of the Interior, Bureau of Land Management
BMPs	best management practices
BPA	Bonneville Power Administration
Corps	US Department of the Army, Corps of Engineers
CRGNSA	Columbia River Gorge National Scenic Area
CRP	Conservation Reserve Program
dBA	Decibels (A-weighted)
DEA	David Evans and Associates, Inc.
DEIS	draft environmental impact statement
DEQ	Oregon Department of Environmental Quality
DOGAMI	Oregon Department of Geology and Mineral Industries
DSL	Oregon Department of State Lands
EFH	Essential Fish Habitat
EIS	environmental impact statement
EMF	electric and magnetic (electromagnetic) fields
EO	Executive Order
EPA	US Environmental Protection Agency
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FCRPS	Federal Columbia River Power System
FCRTS	Federal Columbia River Transmission System
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FPPA	Farmland Protection Policy Act
GIS	geographic information system
GSU	generator step-up
kV	kilovolt
KVA	Key Viewing Area

LGIA	Large Generator Interconnection Agreement
LLC	limited liability corporation
LOS	level of service
mph	miles per hour
MW	megawatt
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NH	Natural Hazards (Sherman County zone combining district)
NMFS	US Department of Commerce, National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPS	US Department of the Interior, National Park Service
NRCS	US Department of Agriculture, Natural Resources Conservation Service
NRHP	National Register of Historic Places
ODFW	Oregon Department of Fish and Wildlife
ODOT	Oregon Department of Transportation
O&M	operation and maintenance
OR	Oregon Route
ORNHIC	Oregon Natural Heritage Information Center
ORS	Oregon Revised Statute
PCB	polychlorinated biphenyl
PPM	PPM Energy, Inc.
RI	radio interference
ROD	Record of Decision
RV	recreational vehicle
SCADA	supervisory, control and data acquisition
SHPO	State Historic Preservation Office
SR-14	Washington State Route 14
TSP	Transportation System Plan
TVI	television interference
USC	United States Code
USDA	US Department of Agriculture
USDOE	US Department of Energy
USFS	US Department of Agriculture, Forest Service

- USFWS US Department of the Interior, Fish and Wildlife Service
- USGS US Geological Survey
- VRM Visual Resource Management

9.2 Glossary

Access road – Roads constructed to each structure site first to build the tower and line, and later to maintain and repair it. Access roads are built where no roads exist. Where county roads or other access is already established, access roads are built as short spurs to the structure site. Access roads are maintained after construction, except where they pass through cultivated land. There, the road is restored for crop production after construction is completed.

Bay – An area set aside in a substation for special equipment.

Best management practices (BMPs) – A practice or combination of practices that are most effective and practical means of preventing or reducing the amount of pollution generated by non-point sources to a level compatible with water quality goals.

Biological Assessment – A document required by the Endangered Species Act, which requires an evaluation of potential effects on listed species and critical habitat prior to implementing a proposed action. Projected action is defined as any activity authorized, funded or carried out by a federal agency.

Bus pedestals - Supports that elevate bus tubing within a substation.

Bus tubing – A metal "bar" used to carry electricity from one piece of equipment to another within a substation.

Capacity – The maximum *load* that a generator, piece of equipment, substation, transmission line, or system can carry under existing service conditions.

Circuit breaker – A switch, installed at a substation, which breaks or restores the flow of current through the line.

Conductor – The wire cable strung between transmission towers through which electric current flows.

Conservation Reserve Program (CRP) - A voluntary federal program to assist private landowners to convert highly erodible and environmentally sensitive cropland to permanent vegetative cover.

Counterpoise – A buried wire system connected to footing of towers or poles supporting a transmission line. Used to establish a low resistance path to earth, usually for lightning protection.

Cumulative Impact – Cumulative impacts are created by the incremental effect of an action when added to other past, present, and reasonably foreseeable future actions.

Current – The amount of electrical charge flowing through a conductor (as compared to voltage, which is the force that drives the electrical charge).

dBA – The first two letters (dB) are an abbreviation for decibel, the unit in which sound is most commonly measured (see decibel). The last letter (A) is an abbreviation for the scale (A scale) on which the sound measurements were made.

Dead-end structures – Heavy towers designed for use where the transmission line loads the tower primarily in tension rather than compression, such as turning large angles along a line or bringing a line into a substation.

Decibel – A decibel is a unit for expressing relative difference in power, usually between acoustic signals, equal to 10 times the common logarithm of the ratio of two levels.

Dispersed recreation – Outdoor recreation in which participants are diffused over a relatively wide area.

Double-circuit – The placing of two separate electrical circuits on the same tower.

Easement – A grant of certain rights to use of a piece of land (which becomes a "right-of-way"). BPA acquires easements for many of its transmission facilities. This includes the right to enter the right-of-way to build, maintain, and repair the facilities. Permission for these activities is included in the negotiation process for acquiring easements over private land.

Electric and magnetic fields (EMF) – The two kinds of fields produced around the electric wire or conductor when an electric transmission line or any electric wiring is in operation.

Endangered species – Those species officially designated by the US Fish and Wildlife Service or NOAA that are in danger of extinction throughout all or a significant portion of their range.

Endangered Species Act – A 1973 federal law, amended in 1978 and 1982 to protect troubled species from extinction. The National Marine Fisheries Service (NOAA Fisheries) and the U.S. Fish and Wildlife Service decide whether to list species as threatened or endangered. Under the Act, federal agencies must avoid jeopardy to and the recovery of listed species.

Environmental impact statement (EIS) – A detailed statement of environmental impacts caused by an action, written as required by the National Environmental Policy Act (NEPA).

Federally listed – Species listed as threatened or endangered by the US Fish and Wildlife Service.

Fiber-optic lines – Special wire installed on the transmission line that is used for communication between one location and another.

Floodplain – That portion of a river valley adjacent to the stream channel which is covered with water when the stream overflows its banks during flood stage.

Footings – The supporting base for the transmission towers. Usually steel assemblies buried in the ground for lattice-steel towers.

Forb – any herbaceous plant that is not a grass or grass like.

Foreground – The viewed landscape from 0 to 0.5 miles from an observer.

Geographic information system (GIS) – A computer system that analyzes graphical map data.

Grillage – Transmission tower footings composed of a 12.5' x 12.5' assembly of steel I-beams that have been welded together and buried14 to 16 feet deep. Generally used to support heavier towers, such as **dead-end structures**.

Ground wire – Wire that is strung from the top of one tower to the next; it shields the line against lightning strikes.

High Voltage - Lines with 230-kV or above electrical capacity.

Hydrology – The science dealing with the properties, distribution, and circulation of water.

Insulators – A ceramic or other nonconducting material used to keep electrical circuits from jumping over to ground.

Intermittent - referring to periodic water flow in creaks or streams.

Kilovolt [kV] – One thousand volts.

Lattice steel – refers to a transmission tower constructed of multiple steel members that are connected together to make up the frame.

Load – The amount of electric power or energy delivered or required at any specific point on a system. Load originates primarily at the energy-consuming equipment of customers.

Megawatt (MW) – One million watts, or one thousand kilowatts; an electrical unit of power.

Milligauss (mG) - A unit used to measure magnetic field strength. One-thousandth of a gauss.

Mitigation – Steps taken to lessen the effected predicted for each resource, as potentially cause by the transmission project. They may include reducing the impact, avoiding it completely, or compensating for the impact.

National Environmental Policy Act (NEPA) – This act requires an environmental impact statement on all major Federal actions significantly affecting the quality of the human environment. [42 U.S.C. 4332 2 (2)(C).]

Non-Attainment Area – An area that does not meet air quality standards set by the Clean Air Act for specified localities and periods.

Notice of Intent - A public notice that an environmental impact statement will be prepared and considered in the decision-making for a proposed action.

Physiographic – Pertaining to the physical features of a geographic area.

Revegetate - Reestablishing vegetation on a disturbed site.

Right-of-way – An easement for a certain purpose over the land of another, such as a strip of land used for a road, electric transmission line, pipeline, etc.

Scoping – Part of the environmental impact document process where significant issues are identified for detailed analysis.

Species – A group of interbreeding individual not interbreeding with another group.

Structure – A type of support used to hold up transmission or substation equipment, such as a transmission tower.

Substation – The fenced site that contains the terminal switching and transformation equipment needed at the end of a transmission line.

Substation dead-end towers – Dead end towers within the confines of the substation where incoming and outgoing transmission lines end. Dead ends are typically the tallest structures in a substation.

Substation fence – the chain-link fence with barbed wire on top provides security and safety. Space to maneuver construction and maintenance vehicles is provided between the fence and electrical equipment.

Substation rock surfacing – A three-inch layer of rock selected for its insulating properties is placed on the ground within the substation to protect operation and maintenance personnel from electrical danger during substation electrical failures.

Switches – Devices used to mechanically disconnect or isolate equipment; found on both sides of circuit breakers.

Traditional Cultural Properties- A traditional cultural property is defined as one that is eligible for inclusion in the National Register of Historic Places because of its association with cultural practices or beliefs (e.g., traditions, beliefs, practices, life ways, arts, crafts, and social institutions) of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community.

Transformer – Electrical equipment usually contained in a substation that is needed to change voltage on a transmission system.

Transmission dead-end towers - Dead end towers not within the confines of the substation, where segments of the transmission alignment come together at an angle.

Transmission line – The structures, insulators, conductors, and other equipment used to transmit electrical power from one point to another.

Volt – The international system unit of electrical potential and electromotive force.

Voltage – The drive force that causes a current to flow in an electrical circuit.

Wetlands – Those areas that are inundated, or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

Chapter 10 - Draft EIS Comments and Responses

In this Chapter:

- Comments Received on the Draft EIS
- BPA's Responses to Comments

BPA completed a DEIS for the proposed Klondike III/Biglow Canyon Wind Integration Project and released it to the public for a 45-day review and comment period that ended on June 19, 2006. One public meeting was held in Wasco, Oregon on May 24, 2006 to gather public comments and to answer questions about the DEIS. This chapter contains the written comments from letters and comment sheets received during the comment period for the DEIS and during the public meeting, and BPA's responses to those comments. Letters and comment sheets were given numbers in the order they were received, and the meeting notes also were numbered. Individual comments in these letters and meeting notes were given additional identifying numbers. For example, letter 005 might have comments 005-1 and 005-2 identified within its text. BPA prepared responses to each of these individual comments. The responses follow each letter.

Because this entire chapter is new, and to make it easier to read, the text is not underlined.

K	londike III/Biglow "I'd 1	Canyon Win like to tell you	nd Integration Pro	ject
1. 1 prefer alternative:	prefer the No project	North	Route in for any other	Route
2. I need more informatio	n about			
3. I have these other com	mente		1	
Please put me on y	our project mailing list. (You a	re already on the m	siling the trees to a second	
Name		re uncady on the In	lanning fist, it you have recer	ved mailed notices.)
Address				
The second se	State		Zip	

Response: 001-1 Comment noted.

\	"I'd like to tell you.	Integration Project
1.1 prefer alternative: Northern Out there They we	The power lines	und towers are should be feere
2. I need more information a	about:	
3. I have these other comme	ents;	
Please put me on you	ar project mailing list. (You are already on the mai	iling list, if you have received mailed notices.)
Name		and the second sec
Name Address		

Response: 002-1 Comment noted.

Klondike III/Biglow Canyon Wind Integration Project Public Meeting - Wasco, Oregon May 24, 2006

Comments

003-1	
003-2	
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003-12

- | Q: Is 600 MW on each side of the line the maximum capacity?
- Q: Will existing power generated be transmitted by new lines?
- 1 Q: Any local use of the power generated?
 - A: Goes into the BPA grid.

Engineering

- Q: When would construction begin?
- If everyone's needs are met operationally I don't have any objections.
- I favor the north alternative.

Q: How would the line be constructed? From both ends? Or from the middle?

- If Judge Redden opens the gates on the four dams on the lower Snake there will be
- more need for additional generation like these wind farms. You keep changing your mind, about the route.
- Q: Has your spacing changed between structures from what we have heard before?

I like the northern alterative the best.

- We need to do something. Have to get away from coal-fired plants. The wind is here and it's free. It's exciting!
 - Q: Why is the northern route your preferred route?
 - A: It has less environmental impacts and is cheaper to build w/fewer dead ends.

Environmental



Stay on country roads - don't go cross-county	through fields tell this to the contractor.
Stay within 125' ROW.	

Q: Do we have to go around survey stakes?

A: It would be nice, but no, hubs will be buried. Leave the stakes in place during construction.

Responses:

- 003-1 Yes, as explained in Chapter 2 of the EIS, BPA's proposed transmission line would be constructed to carry up to 600 MW of capacity in each circuit.
- 003-2 BPA's proposed transmission line would be intended to transmit power from the two proposed wind projects, which would use most of the capacity of the new line. BPA has received a conditional request from PPM to integrate the power from their Klondike II project, which was connected to the regional transmission grid at another location.
- 003-3 The power generated would be interconnected to BPA's main transmission grid and the wind developers could sell the power on the open market, or add it to their resource mix.

- 003-4 If BPA decides to interconnect the wind projects, construction at John Day Substation would be expected to start soon after the Record of Decision (ROD) is signed and published in the Federal Register. Construction of the proposed BPA transmission line would likely begin about 6-7 months after the ROD is signed. The ROD is anticipated to be signed in fall 2006.
- 003-5 Thank you for your comment.
- 003-6 The contractor who BPA would select to build the transmission line, if a decision to build a line is made, would determine the sequence of construction and where construction would begin.
- 003-7 Comment noted.
- 003-8 The proposed route alternatives have changed over time based on public and landowner comments. BPA has adapted the exact locations of the proposed routes to reduce potential impacts to agricultural practices and to reduce visual impacts.
- 003-9 The average span length of 900-1200 feet has remained the same.
- 003-10 Comment noted.
- 003-11 Comment noted.
- 003-12 The Northern Alternative has fewer environmental impacts than the Middle Alternative. It is also less expensive because it is shorter and requires lighter dead end towers than the Middle Alternative.
- 003-13 Comment noted. Access roads for the transmission line would avoid impacting farmland as much as possible. BPA proposes using county roads and the transmission line right-of-way unless conditions require other access locations. BPA would compensate landowners for crop damage if damage occurs during construction or operation and maintenance.
- 003-14 Survey hubs will be buried. If BPA decides to construct the line, survey stakes used for construction should not be disturbed.

	Klondike III/Biglow Canyon Wind Integration Project "I'd like to tell you"	
04-1	1. I prefer alternative: No RTH	
	2. I need more information about:	
4-2	3. I have these other comments: The line is going just routh of my house, to I understand it is the chelapert alternative and the "path of least resistance." I want to see windpower faltern. energy succeed - that's why I want the line to go through even though it means I have to look at it's	at
	Please put me on your project mailing list, (You are already on the mailing list, if you have received mailed notices.)	
	Name Larly Mc Cullouch	
	Address	
	City	

Responses:

004-1 Comment noted.

004-2 Thank you for your comment.



United States Department of the Interior

OFFICE OF THE SECRETARY Office of Environmental Policy and Compliance 500 NE Multnomah Street, Suite 356 Portland, Oregon 97232-2036

9043.1 in reply refer to: ER06/0422

Electronically Filed

June 19, 2006

Mr. Gary Beck, Project Manager BPA Public Affairs BPA – DKC-7 P.O. Box 14428 Portland, Oregon 97293

Dear Mr. Beck:

The U.S. Department of the Interior (Department) has reviewed the Bonneville Power Administration's (BPA) Draft Environmental Impact Statement (DEIS) for the proposed interconnection of up to 300 megawatts of electricity generated from the proposed Klondike III Wind Project (PPM Energy, Inc.), and 400 megawatts from the proposed Biglow Canyon Wind Farm (Portland General Electric), into the Federal Columbia River Transmission System. The following comments are based on the information provided in the DEIS. We reserve the right to provide further comments on any additional information that becomes available.

General Comments

005-1

The Department believes that the purpose and need identified in the DEIS, including minimizing environmental impacts of the Proposed Action, would be best achieved by broadening the document's cumulative impacts analysis, and incorporating the modifications recommended in this letter. We look forward to working with the applicant to minimize the project's contribution to cumulative adverse impacts on birds and bats along the Columbia River corridor. Based on our review of the DEIS, we have the following concerns: 1) avian mortalities from collision or electrocution; 2) the need for upgrading or retrofitting existing structures within the project area to minimize man-made attractants (e.g., perches); and 3) the need for the implementation of post-construction avian and bat fatality monitoring.

005-2

Any changes in local land use implemented during a projected 20-25 year lifespan of the proposed project will impact wildlife use over broad areas of the landscape. Conversion to



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agriculture (e.g., cottonwood farming, crop changes or rotation), habitat fragmentation, livestock grazing, urbanization, and the fire cycle have been identified as large scale management issues in the eastside shrubland and grassland habitats of Oregon and Washington (Johnson and O'Neil 2001). Other species affected by changes in the shrubsteppe landscape due to proposed development are reptiles, amphibians, and small mammals, and the DEIS does not discuss impacts to these resources. The Department recommends that the FEIS discuss the cumulative impacts of the reasonably foreseeable changes in land use and effects on reptiles, amphibians, and small mammals. Also, the DEIS states the number, relative percentage, and species of night migrants (birds and bats) within the proposed Klondike III/Biglow Canyon turbine rotor-blades swept area (RSA) is not known and therefore is not addressed. This information should be collected and analyzed for the FEIS. Further, there has been a rapid escalation of wind power projects east of the Cascade Mountain Range along the Columbia River, and the DEIS's cumulative impacts analysis for avian and bat species should more thoroughly address the cumulative effects of other planned wind power projects in surrounding counties, including Klickitat County to the north.

The proposed installations of transmission lines have the potential to increase raptor perching opportunities within the project area. Perch sites currently available within the project area, both natural and man-made, should be assessed in the FEIS. Man-made perch sites should be considered for removal, if necessary, to reduce the risk of turbine collision. The Department is concerned that, due to the adjacency of the project site to the Columbia and John Day Rivers, resident and wintering bald eagles will be attracted to the new transmission lines and exposed to turbine collision. This potential impact should be assessed and analyzed in the FEIS.

The DEIS indicates that as many as 440 turbines are proposed for this project, and that avian and bat species mortalities each would average several hundred per year for this project alone. The document also indicates, throughout Chapter 4 *Environmental Consequences*, that mitigation measures for habitat restoration and re-vegetation, in consultation with the Oregon Department of Fish and Wildlife, appears to be through the use of "seed mixes." There is no mention, however, of the types of seeds, timing of the restoration, or of the expected effects reseeding might have on the bird and bat populations at the project site. The FEIS should include this information. Also, as high mortalities for both birds and bats could be expected, consideration should be given to amelioration of potential losses through some type of adaptive management practice (e.g., reseeding or re-vegetation efforts to attract birds and pollinating insects away from the project turbines). The development and implementation of an adaptive management framework for the project should be included in the FEIS.

Table 4-1 of the DEIS identifies the reasonably foreseeable future wind power projects in the vicinity (adjacent counties) of the Klondike III/Biglow Canyon wind power project totaling 3,134 MW of electricity or approximately 1,740 turbines (assuming an average of 1.8 MW/turbine). Using the mortality rate per turbine provided in the DEIS, 42 raptors, 1,740 – 3,480 passerines, and 2,610 – 4,350 bat fatalities would be expected each year for the

Draft EIS Comments and Responses

3

005-10 005-11	existing, planned and reasonably foreseeable wind projects including Klondike III/Biglow Canyon. These projected fatality rates pose a significant threat to wildlife. Since considerable uncertainty exists regarding the relationship between newer turbine technologies and bird deaths created by large-scale wind farms, the Department recommends that the FEIS better address avian and bat mortalities as well as effectiveness monitoring to permit accurate, future assessments about the proposed projects' level of impact on avian and		
005-12	1 mo	s species. The Department also recommends that the FEIS include the following diffications and additions to the mitigation measures discussed in "Chapter 4 – vironmental Consequences", sections 4.6 (Fish and Wildlife) and 4.7 (Vegetation):	
005-13	•	The current <i>Cumulative Impacts</i> section analysis only addresses Klondike I, II, III and Biglow Canyon wind projects. The FEIS should include an analysis of the impacts to birds and bats for all wind power projects listed in Table 4-1.	
005-14		The monitoring program should include long-term injury/fatality monitoring to address the assumptions included in the <i>Cumulative Impacts</i> analysis. The Department recommends that a formal long-term monitoring plan and agreement be developed between the U.S. Fish and Wildlife Service (Service), Oregon Department of Fish and Wildlife, BPA, PPM Energy, Inc., and Portland General Electric to assess the cumulative effect of this and other wind power projects in vicinity (see Table 4-1).	
005-15		Proposed mitigation measures should include a formal monitoring plan and agreement to ensure that mitigation measures are completed and that habitat restoration and revegetation are effective.	
005-16		For the Pacific Northwest region, the hoary bat (<i>Lasiurus cinereus</i>) and silver-haired bat (<i>Lasionycteris noctivagans</i>) appear to be at the greatest risk from collision with wind turbines. Bat impacts from new generation large scale wind projects are relatively unknown. Bat surveys should be completed for the Klondike III/Biglow Canyon wind project to determine from a regional perspective the potential risk to these local populations. Studies should also be completed to determine bat migratory patterns, patterns of local movements through the area, and the response of bats to turbines, individually and collectively.	
005-18	•	To reduce the number of towers needed in the future, providers should be encouraged to design new towers structurally and electrically to accommodate the applicant/licensee's antennas and comparable antennas for at least two additional users (minimum of three users for each tower structure), unless this design would require the addition of lights or guy wires to an otherwise unlighted and/or unguyed tower.	
005-19	•	Where feasible, existing guy wires should be marked with recommended bird deterrent devices (Avian Power Line Interaction Committee 1994).	
005-20	•	Buried transmission lines, electric lines, and other cables should be co-located on the access road when practical.	
005-21	I •	Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site. Previous reports indicate that several bird species	

4 have been killed when attracted to wind energy sites by the lighting associated with nearby transformer substations (or other buildings and ancillary structures) during low-005-21 lying fog or heavy mist events. Lighting of these sites should only be used when necessary for required maintenance, and light fixtures should be directionally located to illuminate only those areas on the ground necessary for maintenance. Turbine construction should be encouraged to occur outside the breeding season for 005-22 migratory birds when practical. 005-23 Turbines should be sited as close to existing roads as practical. Road access and fencing should be minimized to reduce or prevent habitat fragmentation and disturbance, and to 005-24 reduce above ground obstacles to birds in flight. All infrastructures should be capable of withstanding periodic burning of vegetation, as natural fires or controlled burns are 005-25 necessary for maintaining grassland habitats. Identify within the project area where pole configuration(s) present a current electrocution risk. Describe specific steps that have been taken, or are planned to reduce or remove the threat of electrocution to raptors in high and low risk areas. Describe 005-26 existing opportunities to further reduce the risk of raptor electrocutions, in order to reduce the cost of prevention; (e.g. using routine inspection and maintenance visits to install raptor protection devices on low and high risk configuration poles. Monitor raptor-safe configurations in high risk areas and low risk areas. Periodically inspect to identify areas of concern and report on the installation, efficacy of design, and degradation in the field of whatever bird protection devices are employed (according to 005-27 published literature on avian power line electrocution, field observations indicate a significant number of bird protection devices are incompletely or improperly installed and may degrade in the field). Monitoring standards and guidelines should be established in the FEIS. Statistical comparisons of bird mortality are the most common measure of data collected at these facilities. Much of the discrepancy in bird collision data comes from two causes; a lack 005-28 of comparable methodology between studies, and trying to compare disparately situated sites (Tingley 2003). Once estimates, methods, and metrics are comparable, they can be used to share site, design, and management information with other facilities to reduce harm to wildlife and their habitats. Guidance should be provided in the FEIS for sitespecific proposals to determine whether conservation objectives are being met. Within the DEIS no references are made to the decommissioning process of the proposed project(s). In other readings, the expected lifespan of wind farm projects has been 005-29 estimated at 20-25 years. The expected life span of the project, and decommissioning

- The expected life span of the project, and de process, should be included for the proposed wind farm developments.
 There is no mention in the DELS of a financial for the project of a financial for the proposed wind farm developments.
- 005-30
- There is no mention in the DEIS of a fire plan, fire control, fire abatement, or the effects of fire on wildlife and wildlife habitat within the project area. Since fire can be a major agent of change in shrub-steppe habitats, and affect both plant and animal populations in a variety of ways, it should be addressed in the FEIS.

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005-31

If it is determined that any of these recommended measures can not be implemented, then the FEIS should provide a justification for that determination. In addition, information on the final location and specifications of the proposed towers, including notification of which of the conservation measures recommended above for the protection of migratory birds and bats were implemented, should be provided to the Service. Consultation and technical assistance requests, information, questions, comments, documents, and required progress reports should be directed to Mr. Kemper McMaster, Supervisor, U.S. Fish and Wildlife Service, Oregon Fish and Wildlife Office, 2600 SE 98th Avenue, Suite 100, Portland, Oregon 97266, at (503) 231-6179.

We appreciate the opportunity to comment and we look forward to working with the applicant to further protect fish and wildlife resources within the project area during the life of the project.

Sincerely,

10 3000

Preston Sleeger Regional Environmental Officer

cc: OEPC, Washington, DC (Rai) RSOL, Portland, OR (Shishido) FWS/DNRC, Portland, OR (Mead) FWS/MBHP, Portland, OR (Green) FWS, Portland, OR (McMaster) FWS, Bend, OR (Gilbert)

6

REFERENCES

Avian Power Interaction Committee. 1994. Mitigating bird collisions with power lines: the state of the art in 1994. Edison Electric Institute, Washington, DC. 78 pp.

Johnson, D.H. and T.A. O'Neil. 2001. Wildlife-Habitat Relationships in Oregon and Washington. Oregon State University Press. 736 pages.

Tingley, M.W., 2003. Effects of Offshore Wind Farms on Birds. Harvard University, Cambridge, MA, 117 pages.

U.S. Fish and Wildlife Service. 2003. Service Interim Guidance on Avoiding and Minimizing Wildlife Impacts from Wind Turbines. 55 pp.

Responses:

- 005-1 Comment noted. Regarding the concerns expressed in the comment, please see responses 005-2 through 005-32.
- 005-2 The FEIS has been modified to include the information about large scale wildlife management issues provided by the comment (see Section 4.6.7) and to provide additional discussion of possible impacts to reptiles, amphibians, and small mammals (see Section 4.6.2.1).
- 005-3 The FEIS has been modified to provide additional discussion of possible cumulative impacts to reptiles, amphibians, and small mammals (see Section 4.6.7).
- 005-4 As discussed in Section 4.6.7 of the EIS, it is estimated that about 660 to 1,100 bats, 440-880 passerines, and 11 raptors could suffer fatal injuries from collisions with the turbines each year. These figures include night migrants. Both wind project proponents have developed monitoring plans that will regularly monitor bird and bat fatalities at each facility and adjust mitigation efforts accordingly. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that these monitoring plans be implemented (see Appendices G and I).
- 005-5 The DEIS addressed the cumulative bird and bat impacts for 16 existing, proposed, and potential wind projects in Sherman and surrounding counties, including three in Klickitat County, Washington (Goodnoe Hills, Big Horn and White Creek). See pages 4-34 through 4-38 of the DEIS and Section 4.6.7 of the FEIS. BPA believes that the EIS provides a reasonable analysis of potential cumulative bird and bat impacts, based on information available about existing and planned wind projects in the region.
- 005-6 New transmission line supports (both wood poles and steel structures, including steel tubes and lattice steel towers) would provide the potential to increase raptor perch opportunities in the project area as would new wind turbines and new fencing around the new substations. The control houses and other equipment within the substations could also create additional perch sites.

A number of man-made perch sites already exist in the project area, such as residential structures, utility poles and lines, fence posts, road signs and existing wind farms (Klondike I and II). BPA has no authority to require removing any of these man-made structures, but recommends that the commenter work with the developers of the proposed wind projects to investigate structure removal where feasible and appropriate. Any structure removal would require compensation for the landowner or utility and other means to provide the service or amenity.

005-7 BPA believes that the potential for bald eagles to be attracted to the new transmission line and thus suffer greater exposure to turbine collision is small. There is no habitat within the project area that would support eagle use, and no large sources of carrion (e.g., sheep or cattle pastures) that would attract bald eagles. With the exception of the area around the John Day Substation (where there are already multiple transmission structures), the new transmission lines

would be located away from open water with limited or no line-of-sight to open water. Bald eagle use of the project area would likely be limited to eagles traveling between the Columbia River and the John Day River, and these eagles would generally be flying at altitudes well above the turbines. The EIS has been revised to reflect this information (see Section 4.6.2.1).

- 005-8 Most proposed site restoration would occur on agricultural fields and would consist either of a temporary cover crop approved by the landowner or the grain crop that would ordinarily be planted on the remainder of the field. A native seed mix has been developed that would be used for site restoration of the small amount of native shrub-steppe and grassland habitats disturbed by the project, and for the mitigation sites. The revegetation and habitat mitigation plans for the proposed wind projects contained in Appendices F and H contain a discussion of the proposed mitigation and a description of the seed mix. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that these plans be implemented (see Appendices G and I).
- 005-9 The seed mix used for site restoration would be designed to mimic existing conditions. Thus, no changes in bird/bat use are expected. Should birds or bat mortalities exceed thresholds described in Chapter 4, additional mitigation in the form of off-site habitat enhancement or restoration would be undertaken. See Appendices F and H for details about the additional mitigation proposed by the wind developers. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that these plans be followed (see Appendices G and I).
- 005-10 BPA believes that the total number of birds expected to be killed by all the wind farms listed in Table 4-1 is not likely significant when measured against the estimated regional bird population (between 0.2 and 0.4 percent of the total regional bird population). However, BPA does recognize that some species may suffer disproportionate impacts which could affect their populations to some degree. This has been discussed in Chapter 4.
- 005-11 The existing analysis of potential impacts to bats and birds is based on studies of other wind farms and site-specific data collected for this project, and BPA believes that the impact analysis is adequate under NEPA to identify potential impacts. BPA recognizes that some uncertainty exists concerning potential impacts to bird species from newer turbine technologies. A comprehensive monitoring plan has been developed for each wind project (see Appendices F and H) that will assess actual impacts to birds and bats from operation of the wind farms. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that these plans be implemented (see Appendices G and I).
- 005-12 Comment noted. The recommendations of the commenter are addressed in responses 005-13 through 005-30.
- 005-13 The cumulative impacts section of the EIS includes an additional analysis of impacts to birds and bats for all the wind projects listed in Table 4-1. This analysis can be found on page 4-36 and 4-37 of the DEIS and Section 4.6.7 of the FEIS.

005-14 Both PPM and PGE have developed long-term injury/fatality monitoring plans for the proposed wind projects and associated facilities. These are included in Appendices F and H of the FEIS. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that these plans be implemented (see Appendices G and I). As discussed throughout Chapter 4.6 of the EIS, the proposed transmission lines are not expected to be more than an incidental and isolated cause of injury or mortality to any species. Additional monitoring for the proposed lines therefore is not proposed.

With respect to the recommendation that a formal long-term monitoring plan and agreement be developed between multiple parties to assess the cumulative impacts of this and other wind projects in the area, BPA believes that it would be appropriate for the commenter to work directly with the proponents of these wind projects to determine if such a plan and agreement could be negotiated.

- 005-15 Both PPM and PGE have developed mitigation/monitoring plans as part of the site certificate process for the proposed wind projects. These are included in Appendices F and H. The mitigation measures identified in Chapter 4.6 of this EIS have been updated to reflect the most current information about these mitigation plans.
- 005-16 Bat mortality estimates have been determined based on monitoring from nearby existing wind farms (see Section 4.6.7), and BPA believes that the EIS provides a reasonable analysis of potential impacts based on generally available information. BPA agrees that regional bat populations are not well understood and that regional studies of bats would be useful. BPA has recently learned that there are currently efforts underway to develop bat population data for most of Oregon and Washington, most notably studies being conducted by the U.S. Forest Service and the Bureau of Land Management. When this data becomes available, it could prove useful for future efforts to more fully characterize potential bat impacts. BPA believes that information collected during monitoring of the various existing and proposed projects, coupled with the larger bat studies underway, will also be effective in characterizing regional bat impacts from wind projects.
- 005-17 See response 005-16.
- 005-18 Because the proposed project does not include proposed antennas, this comment does not appear to be applicable to this project.
- 005-19 Retrofitting guy wires on existing facilities in the area is outside the scope of this EIS; however, providing mitigation for any new guy wires that would be installed on either wind farm or BPA's transmission facilities is within the scope.

No guy wires would be used for BPA's structures. PPM is not proposing using any guy wires for their structures.

While we understand that the only facilities that may be guyed would be some meteorological towers that would be installed by PGE for Biglow Canyon, PGE's site certificate specifies in the event a mortality threshold is exceeded, then

mitigation would be determined in consultation with Oregon Department of Fish and Wildlife and the Oregon Department of Energy.

005-20 BPA is not proposing to bury its transmission line; however, a grounding mat is proposed at each structure/steel tube to dissipate electrical energy into ground, should there be a fault on the line, such as that which would be caused by a lighting strike.

Both wind developers would bury a portion of their proposed transmission lines; PPM proposes primarily burying in the road prism (see Section 2.5.1.2).

- 005-21 Comment noted. Minimizing lighting and shielding security lighting would reduce light and glare and also reduce the likelihood that the light would attract insects, which could in turn attract birds and bats. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that security lights be shielded and downward-directed, and that light sources be minimized (see Appendices G and I).
- 005-22 Comment noted. Although some turbine construction may occur outside of the migratory bird breeding season (generally from March through August) when practical, construction would primarily need to occur during summer months due to access issues and greater habitat disturbance potential during other, wetter times of the year. The Site Certificates for each of the proposed wind projects include conditions that place limitations on project construction, including turbine construction, during migratory bird breeding season (see Appendices G and I). These conditions require that a survey, following a protocol approved by the Oregon Department of Fish and Wildlife (ODFW), be conducted during the year in which construction is to occur to determine whether there are any active Swainson's hawk, golden eagle, ferruginous hawk, and burrowing owl nests within a half-mile of any areas that would be disturbed during construction. A 1.300-foot buffer area would be protected during the breeding season around any active nests that are found. No high-impact construction activities (e.g., blasting, grading or other major ground disturbance) or high levels of construction traffic would be allowed within this buffer area. An independent biological monitor would observe active nest sites during breeding season for any signs of disturbance. If the monitor observes nest site abandonment or other adverse impacts to nesting activity due to construction activity, the wind project developers would be required to consult with ODFW and implement appropriate additional mitigation.
- 005-23 Comment noted. Turbine siting was addressed through the site certificate process for each proposed wind project. Although most of the wind project sites are already disturbed areas in agricultural use, the wind project developers have attempted to site their wind turbines as close to existing roads as practical.
- 005-24 Comment noted. New road construction for the proposed wind projects would be kept to the minimum practicable while still allowing sufficient access to project facilities. As with other existing wind projects in the general area, it is expected that fencing would be limited to only proposed project substations.

- 005-25 Comment noted. All proposed infrastructure is typically designed to withstand natural and manmade hazards including fires, to the extent practicable.
- 005-26 PPM proposes to bury all of its 34.5-kV power lines underground. PGE proposes to bury some power lines, but also have some above ground. Neither BPA's 230-kV transmission line nor PGE's 34.5-kV transmission lines would pose an electrocution risk to raptors. All transmission line structures have been designed using raptor-safe guidelines, which include minimum separation of phases of the conductors of no less than 7 feet for PGE's lines and 22 feet for BPA's line, and adequate clearance between conductors and grounded portions of the structure.
- 005-27 Since there would be no danger of electrocution to raptors or any other birds in the area as a result of the proposed project, there would be no need to monitor the lines as suggested (see also 005-26).
- 005-28 Standards and guidelines for bird mortality studies have been established through the site certificate process for each proposed wind project. Please see Appendices F and H.
- 005-29 The Klondike III Wind Project is expected to have a useful life of at least 25 to 30 years, while the Biglow Canyon Wind Farm is expected to have a useful life of at least 20 to 30 years. However, the lifespan of either project could be extended indefinitely by replacing existing wind turbines, towers, or other infrastructure with new, more efficient turbines or related equipment.

OAR 345-027-0020(9) requires that certificate holders, such as the developers of the two wind projects, shall retire their facilities if the holder permanently ceases construction or operation of their facilities, and the facilities shall be retired according to a final retirement plan approved by the Energy Facility Siting Council, as described in OAR 345-027-0110. The state law requires that the developers shall pay the actual cost to restore the site to a useful, non-hazardous condition at the time of retirement, not withstanding the Council's approval in the site certificates of an estimated amount required to restore the sites.

Restoring either of the wind project sites to a useful, non-hazardous condition upon retirement would involve dismantling all aboveground structures, including the wind turbines, meteorological towers, transmission lines, O&M buildings and substations, removing foundations and grading and replanting the affected area. Nacelles and rotors would be removed, and the turbine towers would be dismantled. Pad-mounted transformers and related above-ground equipment would be removed. Gravel would be removed from adjacent turbine pad areas. Concrete turbine and transformer pads and underground foundations would be removed to a minimum depth of 3 feet below grade. At a depth of 3 feet, buried materials are not expected to interfere with farming practices.

Above ground transmission lines and support structures also would be removed. Underground transmission lines and communication cables that are at least 3 feet below grade would be left in place. All excavated areas would be filled with topsoil. The surface would be graded as appropriate for agricultural uses. The affected areas, including areas temporarily disturbed during site restoration activities, would be replanted with native plant seed mixes or agricultural crops, as appropriate, based on the use of surrounding lands. Facility access roads would be removed. Road areas would be restored with topsoil, graded and replanted with native plant seed mixes or agricultural crops, as appropriate. Alternatively, access roads on private property might be left in place based on landowner preference. Demolition waste material would be disposed at authorized sites.

Please see the discussion beginning on page 16 of the Final Order on the Application for the Klondike III Wind Project (Appendix F to this EIS) and on page 18 of the Final Order on the Application for the Biglow Canyon project (Appendix H of this EIS) for more information concerning the retirement plans for the proposed wind projects.

005-30 As a condition of receiving a site certificate from the State of Oregon, certificate holders would develop and implement a fire management plan during construction in consultation with local fire control authorities (Condition 66). The plan would include measures to reduce the risk of wildfire and to respond to any fires that occur on the facility sites. Both certificate holders need to ensure that construction vehicles and equipment are operated on graveled areas to the extent possible and that open flames such a cutting torches are kept away from dry grass (Condition 68).

With respect to construction of BPA's double-circuit 230-kV transmission line, BPA routinely requires that its contractors prepare a fire plan that addresses prevention, how to be prepared for a fire, and the steps to take in the event of a fire. With regard to operation of the high-voltage transmission line, fire could result in the unlikely event that one or more of the conductors were to separate from the tower(s) and fall to the ground. As stated in the DEIS (Page 4-69), the North Sherman County Rural Fire Protection District has indicated that the proposed projects (both wind farms and BPA's transmission line), would not affect the department's ability to provide fire protection at the site.

Additionally, conditions 65, 67, 69, 70 and 71 of the final order granting a site certificate for Klondike III also addresses fire prevention, and what to do in the event of a fire. For the Biglow Canyon project, conditions 92 through 98 address this same issue. Please see Appendices F and H to review these conditions.

- 005-31 Comment noted. Please see responses 005-13 through 005-30.
- 005-32 Comment noted. We recommend that the commenter contact the developers of the proposed wind projects for final design information when it becomes available. The wind developers are required to submit annual reports to Oregon EFSC regarding mitigation efforts and monitoring results. BPA suggests that the commenter contact EFSC to obtain copies of these reports.

SANMON BATHL PROTECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 1200 Sixth Avenue Seattle, WA 98101

June 19, 2006

Reply To Attn Of:ETPA-088

Ref: 05-010-BPA

Gene Lynard Bonneville Power Administration, KEC-4 P. O. Box 12999 Portland, OR 97208-3621

Mr. Lynard:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the proposed Klondike III/Biglow Canyon Wind Integration Project (CEQ 20060160) in Sherman County, Oregon. The review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). This section of the CAA directs EPA to specifically review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS assesses the impacts of a proposal to integrate electrical power from two wind power generation farms, Klondike III and Biglow Canyon, and to interconnect them to the Federal Columbia River Transmission System (FCRTS). If implemented, the proposed project would require the Bonneville Power Administration (BPA) to execute agreements with Orion and PPM to provide interconnection services, build and operate an almost 12-mile double-circuit 230-kV transmission line and a new 230-kV Substation, and expand and place new equipment in BPA's existing John Day 500-kV Substation. Analysis of effects that would result from the proposed action considered the following five alternative actions: No action, Proposed action (**Preferred Alternative**), Middle Alternative, Klondike III wind farm, and Biglow wind farm.

Under No action, the proposed project would not occur and no impacts would be expected. With all other action alternatives, there would be low to positive impacts to resources within the project area, with the exception of the Klondike III and Biglow wind farm alternatives, which may result in significant impacts to visual resources. The beneficial impacts of this project would be primarily socioeconomic due to job creation, land and easements acquisitions, and compensation to landowners for impacts to their farmlands and crops during the project construction. There would also be positive ecological impacts because there would be no new sources of pollution to influence climate change.

006-1

The draft EIS document includes a good analysis of anticipated environmental impacts from the project and identifies mitigation measures to offset the impacts and monitor effectiveness. The draft EIS also states that Best Management Practices (BMPs) would be used to minimize any potential impacts. Since wind power technology and configuration of wind turbines in the project area are still relatively new, effective adaptive management will also be important to minimize and mitigate impacts.

006-2

Even though EPA supports development of alternative and environmentally sustainable sources of energy such as wind power, the final EIS should include more clarifying information to some sections of the draft EIS as indicated below. Alternatives: In our scoping comments in January 2006, we requested that the draft EIS include a range of reasonable alternatives that would, independent of each other, meet the stated purpose and need for the proposed project to ensure a clear choice among individual alternatives. While the Proposed action and Middle alternatives would meet the purpose and need for the project, the individual wind farm alternatives do not. The final EIS should include information clarifying how the two wind farms would be connected to the Federal Columbia River Transmission System without use of North and Middle transmission lines, which are distinct alternatives (see Map 1). It would also be helpful to have a topographic map or sketch showing wind turbine locations and alignment plans and how they would be interconnected to BPA transmission lines.



006-3

Wetlands: Although it would appear that there are few jurisdictional and non-jurisdictional wetlands on the project site (p. 3-12), impacts to wetlands should be avoided whenever possible, and unavoidable impacts should be mitigated.

006-5

Air quality: Air quality may be impacted in the short term due to construction activities and in the longer term due to traffic on dirt roads, emissions from vehicles and on-site operations, and cumulative impacts from surrounding activities such as agriculture and fire. Therefore, it will be important to monitor the situation and take corrective action if air quality standards are not met. Although Sherman County is an attainment area, it is worth noting that air quality impacts to sensitive populations can be considerable within a few hours of air contamination, even though the standards are not exceeded. Air quality monitoring strategies should therefore be tailored to local conditions.



Consultations with Tribes: During our telephone conversation, we learned from BPA that the project planning team held formal consultations with the tribes, but we did not find information about the outcomes of these consultations in the draft EIS. We recommend the final EIS discuss the process and outcomes of consultations with the tribes.

006-7

006-8

Public participation: On page 1-4 of the draft EIS, we noted that initial public involvement in the planning process for this project was limited. We hope that there will be an effort to boost public participation in this project planning and implementation. The draft EIS also indicates that public comments on the proposed action were solicited and key issues considered. We recommend that the final EIS include a discussion on the number of comments received and responses provided.

Based on our review, we have assigned a rating of EC-1 (Environmental Concerns-Adequate) to the draft EIS. This rating and a summary of our comments will be published in the Federal Register. A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this draft EIS. If you have questions or comments concerning our review, please contact Theogene Mbabaliye at (206) 553-6322.

Sincerely,

/S/

Christine B. Reichgott, Manager NEPA Review Unit

Enclosure

cc: EPA Oregon Operations Office

2

Responses:

- 006-1 Thank you for your comment.
- 006-2 Comment noted. Please see responses 006-3 through 006-7.
- 006-3 BPA believes that it has included an appropriate range of reasonable alternatives in the EIS to meet BPA's stated need for action concerning the proposal. The purpose and need statement defines the need for BPA to respond to the interconnection requests made by the wind developers, and to decide whether and where to construct a transmission line that would allow for the proposed interconnection. The alternatives analyzed in detail in the EIS were developed to respond to that need, with two alternatives for a transmission line route and substation providing interconnection, and a No Action Alternative. The EIS also explains how other transmission line alternatives were considered but were eliminated from detailed study in the EIS.

As a clarification, the two proposed wind projects discussed in the EIS are not alternatives under consideration in the EIS. Rather, these are identified in Section 2.5 of the EIS as the reasonably foreseeable consequence of implementing either of BPA's action alternatives. Both proposed wind projects would be connected to the FCRTS via either the North Alternative or Middle Alternative, if BPA decides to take one of the action alternatives.

With respect to the request for a topographic map showing the locations where the turbines would be sited, preliminary maps have been added to the EIS in Appendix J.

- 006-4 As discussed in the EIS, BPA's proposed transmission line would be located far from any of the identified wetlands in the project vicinity, and therefore no impacts to wetlands would occur. In addition, both of the proposed wind projects would be sited to avoid wetlands in their respective project areas. The Site Certificates issued by Oregon EFSC for each wind project contain conditions requiring that all on-site wetlands be avoided (see Appendices G and I).
- 006-5 Comment noted. See proposed mitigation activities in Section 4.12.3, Mitigation Measures and additional information in Section 3.12, Air Quality.
- 006-6 Early in the EIS process, BPA contacted five upper Columbia River tribes about the proposed project: the Confederated Tribes of the Warm Springs Indian Reservation, the Confederated Tribes of the Umatilla Reservation, the Yakama Indian Nation, the Wanapum Tribe, and the Nez Perce Tribe. During a site visit with the elders of the Warm Springs Indian Reservation, tribal members expressed concern about cultural resources being encountered during wind turbine construction in some areas. Sections 3.10 and 4.10 of the EIS have been revised to include this information.

In addition, the Warm Springs Indian Reservation has requested that monitoring be undertaken during construction activities. The DEIS identified cultural resource monitoring in specific areas where construction activities would likely encounter cultural resources as a mitigation measure, should a decision be made to implement the Proposed Action.

- 006-7 Please see Section 1.4 of the FEIS for a description of the many opportunities BPA presented for the public to participate in this project. BPA had an extended scoping period, held public meetings in the potentially affected community and accepted comments through a web-based comment site and through traditional mail and phone options. In addition, the BPA project manager, project engineer, and other staff met with local landowners to make adjustments to the proposal to lessen impacts. The proposed routes for the BPA transmission line were changed based on public comments received during the scoping period. This FEIS includes the comments received on the DEIS and BPA's responses to those comments.
- 006-8 Comment noted.

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