

Condon Wind Project
"I'd Like to Tell You . . ."

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: CWP2-003 RECEIPT DATE: AUG 0 2 2001
--

1. When you prepare your environmental analysis, please consider: _____

2. Please avoid areas like: _____

3. I need more information about: _____

4. I have these other comments: *I have studied the Condon Wind Project DOE/EIS-0321. very informative and well done. As a participant I'm much in favor. This should be very good for Gilliam County, and should be beneficial for the nation. A source of good clean renewable power.*

(if you need more space, please use the back.)

Please put me on your project mailing list.

Name NORMAN FRAMAN
 Address 410 E SUMMIT ST
CONDON OREGON 97823

Please mail your comments by August 7, 2000 to:

Bonneville Power Administration
 Public Affairs Office - KC-7
 P.O. Box 12999
 Portland, OR 97212



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10
 1200 Sixth Avenue
 Seattle, WA 98101

Reply To
 Attn Of: ECO-088

00-038-BPA

July 26, 2001

Sarah Branum
 Environmental Specialist -KEC-4
 Bonneville Power Administration
 P. O. Box 3621
 Portland, OR 97208-3621

Dear Ms. Branum:

We have reviewed the draft environmental impact statement (EIS) for the **Condon Wind Project** according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309, independent of NEPA, specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The Condon Wind Project is located on 38 acres of private non irrigated agricultural land within a 4,200-acre study area located on both sides of Highway 206, five miles northwest of Condon in Gilliam County, north-central Oregon. SeaWest Power proposes to build 41 wind turbines with a capacity of 24.6 megawatts (MW). The project most likely will include 42 additional wind turbines with 25.2 MW during a second phase. According to the Bonneville Power Administration (BPA), data reveals a less economic wind resource than anticipated and a larger project may be more economical.

The turbines would be located on top of plateaus to take advantage of the best wind and spaced (460 feet between towers) to allow room for agricultural use and crop dusting. Total height of each tower is 274.5 feet, constructed on 12-foot diameter concrete foundations. Phase one and two would each have 6.5 strings or rows. Depending on width, there would be between 14 and 17 miles of existing and new graveled roads in the project.

The EPA's earlier concerns in a scoping letter about bird collisions with the turbines were satisfactorily answered with a detailed analysis on avian mortality from other wind power projects and with proposed actions to mitigate those effects:

- Avian use in the study area is low.
- The design of tubular steel towers rather than lattice towers minimize bird perching or nesting opportunities.
- The slow-moving blade rotation (one revolution every two seconds) increases the

visibility of blades.

- Turbines would be located on the top or downwind sides of ridges, where raptor use is less.
- Where feasible, transmission facilities would be located underground to reduce the number of locations near turbines where birds may be attracted to perch.

Overall, we believe this EIS was well written and complete, and we have rated this document LO (Lack of Objections). We are pleased that the BPA is striving to meet the Department of Energy's (DOE) Wind Powering America initiative to supply 5 percent of U.S. electricity through wind technologies by 2020. Meeting this goal will avoid annual greenhouse gas emissions of more than 30 million metric tons of carbon equivalent in 2020. This rating and a summary of our comments will be published in the *Federal Register*. An explanation of the EPA rating system is enclosed for your review. However, there are a few comments needed for clarification that should be in the final EIS.

The Need for Renewable Energy Sources

Because of the current energy supply issues, we are pleased that BPA is expanding the use of renewable energy sources. BPA's goal is to have renewable energy sources make up 5 percent of its total sales by 2006. Technologies like these can help displace power currently generated by fossil fuel combustion and hydro, and meet energy needs without additional emissions from greenhouse gases. The project is an opportunity to help the region integrate renewable resources into the power system in the future, and to satisfy consumer demand to increase the amount of new renewable energy resources in the region's power supply.

Power Rates

One of the issues raised by the public during the scoping process was how the project would affect power rates. The FEIS should include information on the Gilliam County's power rates, which according to BPA staff, will not change because of this project's small size. But the EIS should discuss whether the electricity will be sold within the region or to outside markets, as well as potential reductions in impacts from other types of power generation. Also, include what type of power generation is wind likely to substitute for.

Cumulative Effects

NEPA requires that cumulative impacts be addressed as a summary of the individual impacts of this and all other past, present and "reasonably foreseeable" future projects, including activities on private adjacent land irrespective of what agency/entity has decision-making authority or analysis responsibility. The reasonably foreseeable development scenario may have a large impact on wind power generation facilities. Projections could vary for the number of turbines and turbine spacing and turbine locations, and future energy development.

In the Cumulative Impacts Section, Chapter 4, page 1, the EIS says that implementation of the proposed project may establish a precedent for wind energy development in the Condon area. However, if other projects are planned, potential cumulative impacts would be evaluated for visual impacts (more turbines) as well as impacts to birds and bats.

SeaWest should identify the reasonably foreseeable development scenario for their wind generation proposal, and BPA should evaluate this scenario further. Reasonable forecasting is implicit in NEPA and federal agencies should attempt to predict the environmental effects before they are fully known, unless obtaining such information is unreasonable. Development of wind electrical energy production capacity on the Condon site may encourage or promote additional transmission lines or additional wind generation facilities to be built. Such possibilities should be addressed in the EIS and incorporated into the reasonably foreseeable development scenario. Questions to be considered in the EIS should include: the likelihoods that there will be future projects in the area, an estimate of the magnitude, and the environmental consequences of a reasonably foreseeable scenario.

Thank you for the opportunity to review this project. If you have any questions, please call Val Varney (206) 553-1901.

Sincerely,


Judith Leckrone Lee, Manager
Geographic Implementation Unit

Enclosure