

Tom Stoops,

This letter is intended to document and raise objection to the siting of the ARWPP as proposed in Union County. Please forward this message to the EFSC members and enter it into the official review proceedings.

The proposed ARWPP locates turbine strings on the north end of Ramo Flat. The EVWP also proposed turbine strings in the same area and those were removed at the request of the ODFW to mitigate the impact on wildlife habitat (big game and sage grouse). Horizon neglected the recommended Macrositing phase in the siting guidelines as well as their previous mitigation with EVWP and the recommended avoidance of Category 1, 2 & 3 wildlife habitat with the ARWPP siting application. The Ramo Flat area is designated as a Zone of Multiple Biological Values (ZMBV) due to the presence of critical wildlife habitat and the presence of both big game and several threatened or sensitive species. ODFW has presented alternative siting locations to Horizon, but these have not been considered at this point.

The ARWPP mitigation plan (HEF) identifies 112 acres of forestland that will be permanently removed from Craig Mountain to accommodate the project. Both the US Fish and Wildlife Services and the ODFW have recommended the avoidance of these areas due to the critical habitat as well as the presence of sensitive species and “high abundance of migratory birds and bird diversity”. The USFW recommends these areas be documented as category 1 and /or 2 habitats. OAR 660-006-0025 states “A power generation facility shall not preclude more than 10 acres from use as a commercial forest operation unless an exception is taken pursuant to OAR 660-004-...”. Both the HEF and the Union County responses to the application only consider the actual footprint of the power poles, roads and turbine pads. Coniferous forest will be impacted well outside these boundaries. It is well documented in forestry practices that opening corridors will result in extensive damage and mortality to bordering trees.

A.J. (Jed) Farmer