

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 ARWPP will directly impact essential, and potentially irreplaceable, habitat for multiple wildlife species. The proposed actions by ARWPP to mitigate that impact do not take into consideration existing information to identify and quantify that impact. Nor does the mitigation plan adhere to OAR 635-415-0025 requiring “no net loss and to provide a net benefit of habitat quantity or quality” (Habitat Category 2). The mitigation plan does not comply with UCZPS 20.09 in the Union County land use plan under OAR 345-021-0021 which “requires mitigating in favor of Goal 5 resource” - big game winter range and critical wildlife habitat.

Specifically, the mitigation plan identifies the impact area as the acreage removed from habitat by the physical presence of roads and actual turbines. Existing information from the adjoining EVWF, oil and gas energy projects, and Starkey Experimental Forest studies identify the “zone of impact” from this type of activity to encompass from one to three miles around the actual physical footprint. Therefore, the mitigation plan submitted seriously ignores applicable studies and underestimates the extent of impact as well as inadequately proposing mitigation alternatives.

The mitigation plan consists of the creation of a Habitat Enhancement fund (HEF). The proposed funding is based on the physical footprint rather than the “zone of impact” and, consequently, is vastly underfunded.

The HEF proposes Individual Management Projects (IMPs) for landowners within the project boundaries that rely on voluntary compliance with no regulatory enforcement authority. The HEF would require a subjective evaluation to establish non-compliance and then, after a non-specified period of negotiation with the landowner, halting their receipt of funds and finding another landowner to take their place in the mitigation. The identification of potential “other landowners” for replacement with respect to location, proximity, habitat and willingness to participate is completely lacking in the plan.

The mitigation plan also proposes to use county and/or state personnel to implement, monitor and maintain the plan without identifying the required staffing, qualifications, support systems, availability and associated costs through time.

The failure of the Impact Mitigation Plan to address the magnitude of impact as well as proposing a seriously flawed execution plan will result in a significant detrimental impact to the Goal 5 resource - wildlife habitat. The only acceptably alternatives to the ARWPP are to deny its application or to require its relocation to an area outside of big game habitat.

A.J. (Jed) Farmer