

Wendy King
1337 SW Pumice Ave. Apt 303
Redmond, OR 97756
wkingproshop@gmail.com

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Christopher Clark
Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street NE, Salem, OR 97301

Dear Christopher Clark,

I am representing my family farm without legal representation.

I wish to contest WheatRidge East RFA-1 on the basis of Scenic Resources OAR 345-022-0080 (2) and that the council should impose a condition that removes at least three most prominent towers located on the top of Gleason Butte. The visual representations provided in DPO Exhibit R are misleading, vague and downplay the true adverse visual impact wind turbines impose on this elevated landscape. It is my understanding that WheatRidge has several alternate tower locations that may be used instead.

I raised this issue on March 21, 2024 at the DPO Public Hearing stating, "To allow wind turbines to outreach the peak of Gleason Butte will destroy its natural beauty. The blinking red beacons visible even at night will remind us of its presence." I Raised this issue in a written public comment April 4, 2024, by explaining in detail the many locations from which Gleason Butte is in view. "While Morrow County has not protected the privately owned Gleason Butte, it is adored by many in the community and beyond."

Secondly, I am compelled to contest WheatRidge RFA-1 in reference to Historical, Cultural and Archaeological Resources OAR 345-022-0090(1)(a) and that the council should impose a condition that removes at least three most prominent towers located on the top of Gleason Butte. Towers in the viewshed of Myers Century Farm result in significant adverse impacts to our Historical setting and viewshed.

I raised this issue on March 21, 2024 at the DPO Public Hearing stating, " I ask that you consider the impacts to our working family and the many working families of our community that will look at these towers each day. Our Century Farm is an agriculture operation surrounded by Eight Energy projects on all sides. I raised this issue in a written public comment April 4, 2024, where I explained, "The Bartholomew-Myers Farm

is a historical resource. It was adopted into the Century Farm and Ranch Program (CFR1093). The approved application from the Century Farm and Ranch application completed in 2005 stated: "While farming challenges remain, all of those on the farm enjoy the beautiful countryside and respect the great heritage that we have on the Bartholomew-Myers Farm."

Thirdly, I ask to contest WheatRidge RFA-1 concerning Wildfire Prevention and Risk Mitigation OAR 345-022-0115 (1)(b)(D) because the Mitigation plan is not in compliance as it relies on outdated, inaccurate mapping. I request the council impose a condition that protects and compensates crop owners in the event that a wildfire occurs at the facility site because the facility is driven by wind, it must protect resources downwind not just within the site boundary. WheatRidge does not have adequate procedures to minimize damages to resources.

I raised this issue in a written public comment April 4, 2024, by stating, "Our homesteads are located just two miles outside the analysis area; we are left vulnerable to wildfire from the project because we are downwind from the towers to our south and southwest." Another written comment states, "I challenge the accuracy of the maps in the Wildfire Prevention and Risk Mitigation Plan because it appears they are from an outdated source." Yet another written comment says, "It is improper to use a map that shows that a dryland wheatfield has no overall wildfire risk - inside and outside the analysis area. It appears the maps lack enough specificity to satisfy OAR 345-022-0115(1)(a)(B) & (C)" My comment pertaining to Lightning, "There is no discussion of a plan to monitor or alert the community of a lightning strike that has achieved ignition to satisfy OAR 345-022-0115 (1)(a)(D)."

Lastly, I am obligated to contest Wheat Ridge RFA-1 concerning Cumulative Effects Standard for Wind Energy Facilities OAR 345-024-0015(5) & (6) because WheatRidge has not designed the facility to reduce cumulative adverse environmental effects and minimize adverse visual features. I ask that the council impose a condition that removes at least three of the most prominent towers located on the top of Gleason Butte.

I raised this issue March 21, 2024 at the DPO Public Hearing stating, by stating, "We ask WheatRidge for a small concession of excluding towers from our viewshed of Gleason Butte that will provide some relief..."

I raised this issue in a written public comment April 4, 2024, by stating, Movement on the landscape or horizon attracts the eye, so to say, "it would not dominate the viewshed," (EXHIBIT DD: SPECIFIC STANDARDS, 4.5 Visual Impacts Minimization page 9) appears to be a subjective opinion."

OAR 345-024-0015 (6) Concerning minimum Lighting Necessary, I contest that WheatRidge is out of compliance because they misrepresent the impact of night time lighting (needed for Aviation safety). I ask that the council impose a condition that

removes at least three of the most prominent towers located on the top of Gleason Butte.

I raised this issue March 21, 2024 at the DPO Public Hearing stating, by stating, “The blinking red beacons visible even at night will remind us of its presence.”

I raised this issue in a written public comment April 4, 2024, by stating, “The developer states, “Facility lighting impacts would be minimal.” This is another offering of a subjective opinion to persuade the reader. They go on to say: “turbines will likely be lit with an array of red flashing lights synchronized to flash simultaneously.” and “This may be the only opportunity to ask the Council to interpret or broaden the Cumulative Effects Standard to “find that the applicant can design and construct the facility to reduce adverse environmental effects in the vicinity by practicable measures.”

I wish to contest as a party to protect a personal interest on behalf of my family who simply desire to continue farming and ask for consideration to limit negative impacts to our enjoyment of our property and livelihood.

Sincerely,

Wendy King