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BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2009-01: WHISTLING RIDGE ENERGY LLC; WHISTLING RIDGE ENERGY PROJECT	EXHIBIT NO. 12.00
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APPLICANT'S PREFILED DIRECT TESTIMONY

WITNESS #13: TIMOTHY C. HOMANN

Q Please state your name and business address.

A My name is Timothy C. Homann, and my business address is PO Box 790, Stevenson, Washington 98648-0790.

Q What is your present occupation and profession, and what are your duties and responsibilities?

A I am the County Engineer in Skamania County's Public Works Department. Washington law requires that each county employ a county engineer, who, among other things, supervises the construction, alteration, improvement, repair, and

1 maintenance of all county roads. As Skamania County's County Engineer, I manage
2 Skamania County's Engineering Division, which, among other things, is responsible
3 for determining which of the over 250 miles of county roads and 26 county bridges
4 need improvement and/or reconstruction. I have been the County Engineer for
5 Skamania County since December 2007.

6
7 Q Please summarize your education and prior professional experience.

8
9 A I am a Professional Engineer (Civil) licensed by the State of Washington for over 34
10 years. I graduated with a Bachelor of Science in Civil Engineering from Washington
11 State University in 1971. After graduation, I worked for the City of Tacoma for 14
12 years and performed duties and assignments in all aspects of the design and
13 construction of streets and arterials. I subsequently was the Public Works Director for
14 Lewiston, Idaho; Public Works Director for Douglas County, Nevada; and Deputy
15 Public Works Director and City Engineer for Carson City, Nevada. Prior to my
16 current position with Skamania County, I worked for 9 years as the Public Works
17 Director for St. Helens, Oregon.

18
19 Q Are you testifying as a proponent of the Whistling Ridge Energy Project?

20
21 A No. I have been asked to testify in my capacity as the Skamania County official
22 responsible for the construction, alteration, improvement, repair, and maintenance of
23 all Skamania County roads in order to provide information to the Energy Facility Site
24 Evaluation Council about the issue of road improvements in the Columbia River
25 Gorge National Scenic Area (Scenic Area).

26 //

1 Q Have you reviewed the transportation sections of the Application for Site Certification
2 for the Whistling Ridge Energy Project?

3
4 A Yes, I have reviewed Section 2.19.5 (Alternative Construction Access), Section 2.19.6
5 (Alternative Haul Routes and Methods of Transport), and Section 4.3 (Transportation).

6
7 Q Have you reviewed the transportation sections of the Draft Environmental Impact
8 Statement (DEIS) for the Whistling Ridge Energy Project?

9
10 A Yes, I have reviewed Section 3.11 (Transportation) and Table 4-1 (Summary of
11 Whistling Ridge Energy Project Permits and Approvals).

12
13 Q Is the information pertaining to the improvement of Skamania County roads in those
14 sections of the Application and the DEIS within your area of authority and/or
15 expertise?

16
17 A Yes.

18
19 Q Are you able to answer questions under cross examination regarding the improvement
20 of Skamania County roads?

21
22 A Yes.

23
24 Q Are you familiar with the size of the vehicles that would likely be used to transport
25 Project components along Skamania County roads?

26 //

1 A Yes. Transportation of wind energy components could require the use of specialized
2 trucks with loads as high as 17.5 feet from the ground, as wide as 14.5 feet, or as long
3 as 150 feet.

4
5 Q Are you familiar with the Applicant’s preferred access route on Skamania County
6 roads to the Project site?

7
8 A Yes, the Applicant’s preferred access route on Skamania County roads is that which is
9 called Route 3 in the Application and that which is simply called the proposed access
10 in the DEIS (*i.e.*, north from SR 14 along Cook-Underwood Road to Willard Road to a
11 new connection to West Pit Road).

12
13 Q Are there any modifications or clarifications that should be made to the information
14 pertaining to the use of Skamania County roads in those sections of the Application
15 and the DEIS that you reviewed?

16
17 A Yes. Page 4.3-10 of the Application states that crossing the bridge on Cook-
18 Underwood Road over the Little White Salmon River “with specialized trucks
19 transporting wind energy components would require special provisions agreed upon
20 between S.D.S. Co., LLC and Skamania County.” In this context, the “special
21 provisions” referenced is a haul route agreement that would only be required for
22 overweight or oversize trucks. Vehicles below these thresholds do not require a haul
23 route agreement (or any other “special provisions”) to cross this bridge.

24 Cook-Underwood Road intersects SR 14 at two locations. Between Cook-
25 Underwood Road’s *west* intersection with SR 14 (at MP 56.28) and its east
26 intersection with Willard Road, Cook-Underwood Road *does* cross this bridge over the

1 Little White Salmon River. In contrast, between its *east* intersection with SR 14 (at
2 MP 63.32) and its east intersection with Willard Road, Cook-Underwood Road *does*
3 *not* cross this bridge. Consequently, so long as overweight or oversize trucks access
4 the Project site by turning onto Cook-Underwood Road at its east intersection with SR
5 14 and then use the east intersection of Cook-Underwood Road and Willard Road, no
6 haul route agreement (or any other “special provisions”) would be required in regard
7 to the bridge over the Little White Salmon River, because they would not be crossing
8 this bridge.

9 In addition, the DEIS, on page 3-226 states that

10 “Improvements to County and private roads
11 between SR 14 and the project site would be necessary
12 to support the long and heavy loads that would be
13 required for the delivery of the wind energy components.
14 These improvements would include widening and
15 rebuilding sections of the existing roadway network, as
16 well as placing asphalt on some roads that would be
17 used for hauling equipment and project components to
18 the project site. All existing county roadways requiring
19 improvements prior to hauling would be designed and
20 constructed in accordance with the WSDOT *Design*
21 *Manual* (WSDOT 2007) and *A Policy on Geometric*
22 *Design of Highways and Streets* (AASHTO 2004).”

23 This paragraph is inaccurate to the extent that it applies to County roads within the
24 Scenic Area. In my professional opinion, the use of Route 3 in the Application (*i.e.*,
25 north from SR 14 along Cook-Underwood Road to Willard Road to a new connection
26 to West Pit Road) will not require any pre-haul improvements (*e.g.*, widening,

1 rebuilding, or the laying of additional asphalt) to County roads in the Scenic Area,
2 provided oversize and overweight vehicles use the east intersection of SR 14 and
3 Cook-Underwood Road and the east intersection of Cook-Underwood Road and
4 Willard Road. The dimensions and alignments of the existing roadway cross-sections
5 in the Scenic Area are adequate to accommodate the proposed use of Route 3 without
6 widening or otherwise improving these roads, provided oversize and overweight
7 vehicles use the east intersection of SR 14 and Cook-Underwood Road and the east
8 intersection of Cook-Underwood Road and Willard Road.

9 Finally, Table 4-1 in the DEIS states that the Project would require three
10 permits/agreements from Skamania County’s Public Works Department: a road
11 approach permit, a haul route agreement, and negotiated private road agreements.
12 Skamania County’s Public Works Department finds that no “negotiated private road
13 agreements” are required by this Project’s circumstances, and I believe this reference
14 could be removed from Table 4-1.

15
16 Q The original version of the Application indicated that road improvements would be
17 required at the east intersection of SR 14 and Cook-Underwood Road. Could you
18 please explain why, in your professional opinion, use of that intersection by oversize
19 vehicles would now *not* require any road improvements?

20
21 A In 2009 there was a streetlight pole on the west side of Cook-Underwood Road at that
22 intersection. The streetlight pole’s location could have precluded the use of that
23 intersection by oversize vehicles unless the intersection was improved by relocating
24 this utility facility. However, since then Skamania County’s Public Works
25 Department, in Phase I of an eventual county-wide public safety program to improve
26 street lighting, funded and coordinated the relocation of several streetlights in

1 Skamania County, including the relocation of that streetlight to the east side of the
2 intersection to provide improved illumination of vehicles at that intersection. With the
3 intersection's current configuration, the Project would not require any road
4 improvements. Again, in my professional opinion, the use of Route 3 in the
5 Application will not require any pre-haul improvements to County roads in the Scenic
6 Area, provided oversized and overweight vehicles use the east intersection of SR 14 and
7 Cook-Underwood Road and the east intersection of Cook-Underwood Road and
8 Willard Road.

9
10 Q Could you please describe Skamania County's road haul agreements?

11
12 A Skamania County requires that private individuals and entities proposing to use
13 oversized or overweight vehicles on County roads enter into a road haul agreement with
14 the County. These agreements are approved by the Board of County Commissioners
15 and authorize the County Engineer to issue a county right-of-way use permit. Prior to
16 the issuance of that right-of-way use permit, the applicant must submit an acceptable
17 (i) traffic control plan, (ii) signing plan, and (iii) traffic management plan. The traffic
18 management plan has heightened importance in this situation, because it will describe
19 how flaggers will manage Project-related traffic in such a way as to facilitate the
20 movement of non-Project traffic.

21 Before hauling begins under a road haul agreement, we inspect the condition of
22 the County roads to be used and do initial testing of the structural integrity of the haul
23 route's roadway section. A pre-haul report is then issued documenting the existing
24 condition of the roadway structure. During the course of the hauling operation,
25 County staff conducts at least bi-weekly visual inspections of the subject roads. In
26 addition, these bi-weekly inspections include observation of the traffic signing and

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traffic control details of the operation. If these inspections reveal any deficiencies in the roadway structure, traffic signing, or traffic management, the permittee is notified and is responsible for remedying those deficiencies at its own expense. Once the hauling operation is complete, a post-haul inspection is conducted, comparative testing occurs, and a post-haul report is issued. The permittee is responsible for restoring the roadway structure to its pre-haul conditions, again, at the permittee's expense. One year after the haul is complete, a final inspection is completed and a mitigation report is issued identifying any remaining repair work necessary to return the roads to their pre-haul condition. The permittee must provide a bond to the County in the amount the County determines is sufficient to ensure that the subject roads will be appropriately maintained and repaired.