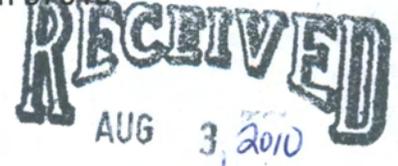


Friends of the Historic Columbia River Highway

PO Box 50, Bridal Veil, Oregon 97010
<http://www.hcrh.org>



Washington Energy Facility
Site Evaluation Council
905 Plum Street SE
Olympia, WA 98504-3172

BPA
Public Affairs Office – DKE-7
P.O. Box 14428
Portland, OR 97293-4428

RE: Whistling Ridge Energy Project DEIS

Dear Ladies and Gentlemen,

The Friends of the Historic Columbia River Highway has sincere and strong concerns about the proposed Whistling Ridge Energy Project's potential impacts on the Historic Columbia River Highway, a district listed in the National Register of Historic Places.

The Historic Columbia River Highway (HCRH) is a linear scenic and historic resource in Oregon, extending from Troutdale to The Dalles. All of the HCRH is a Key Viewing Area within the Columbia River Gorge National Scenic Area (CRGNSA). Portions of the HCRH that are a trail are designated as a National Recreational Trail. Portions of the HCRH are closer to the proposed project than the sites chosen for visual resource analysis. In particular, Mitchell Point is due south of the proposed project and within the Special Management Area of the CRGNSA. There is an existing viewpoint/overlook within the Oregon Parks and Recreation Department (OPRD) property at Mitchell Point, including an interpretive sign at the edge of the cliff overlooking the Columbia River. See photo.

Mitchell Point was the site of the famous Mitchell Point Tunnel (also know as the Tunnel of Many Vistas because of its five "windows" overlooking the Columbia River) on the Columbia River Highway (see photos). While the original tunnel is gone, planning efforts since 1987 have looked at ways to reconnect the HCRH in this area. In 2008 the Friends of the Historic Columbia River Highway financed an engineering feasibility study that concluded that it is feasible to construct a new tunnel at this site, which could have "windows" at the former location of the viaduct. This proposal is included in the Mile Post 2016 Reconnection Projects, the most recent planning document published (see attachments). In addition, OPRD is currently developing a project to enhance the existing viewpoint.

The Mitchell Point overlook is even more visually sensitive than Interstate 84, both because it is higher in elevation and because it is a place where people stop and get out of their cars to take photos. It is closer to the proposed project than Viento State Park, Koberg Beach State Park and the single location on the Hood River to Mosier section of the Historic Columbia River Highway

State Trail that were analyzed. This site must be analyzed for visual impact from the proposed project.

When the highway was constructed in 1913-1922 Samuel C. Lancaster wrote: "our first business was to find the beauty spots, or those points where the most beautiful things along the line might be seen in the best advantage, and if possible to locate the road in such a way as to reach them." This was accomplished by directing curves to draw attention to dramatic viewsheds and design features that enhance the appreciation of dramatic scenic landscapes. These design techniques are a critical component of the historic value of the Historic Highway, the first scenic highway in the country. Harming the views from these viewing locations directly undermines the historic integrity of this nationally important historic resource. The view from Mitchell Point in particular highlights the important relationship between highway design and maximizing appreciation of scenic landscapes. The original Tunnel of Many Vistas provided enhanced views of the Columbia River and the geologic features across the river on Underwood Bluff. The recreated tunnel will also highlight similar views. The proposed development would directly harm these views.

As evidenced by the attached photos and the design features that highlight views from the "Tunnel of Many Vistas" underscore the views' significance to the highway designers. The significance of this view was further confirmed when the Management Plan for the CRGNSA was adopted in 1991. The Underwood Bluff was given an Open Space zoning designation and a Gorge Walls, Canyonlands, and Wildlands landscape setting designation. Both designations were adopted in part in response to scenic resource inventories that established visually quality objectives. The DEIS fails to acknowledge the scenic resource inventory or how the proposed development would impact this view. The development would include enormous industrial structures with moving parts and flashing lights that would break the sky-line of this view. Attention would be drawn away from the historic view and be focused on modern industrial development. This would cause significant adverse effects to the views.

While the most severe impacts would occur to views from the HCRH at Mitchell Point, significant adverse impacts to views from miles of the HCRH would occur. The DEIS must be revised to accurately reflect the impacts to the length of the HCRH. The single simulation of a view from the Mosier to Hood River section of the HCRH State Trail (Viewpoint 19) is both misleading in its presentation and incomplete. There is no analysis of impacts to the view corridor. Notably, this section of the HCRH are part of a separate multi-agency restoration project that reconnected and restored the HCRH for public enjoyment. Millions of dollars were spent to restore this resource so the public could enjoy pristine and historic views. The DEIS fails to take this context into account.

In sum the DEIS fails to adequately analyze the likely impacts to views from the Historic Columbia River Highway. Because the impacts were not adequately addressed, appropriate alternatives were not analyzed and appropriate avoidance and mitigation measures were not considered.

Friends of the Historic Columbia River Highway encourage EFSEC and the BPA to revise the DEIS to actually reflect the likely impacts of the proposed development on the Historic

Columbia River Highway. The revised DEIS must include alternatives that would not include any turbines within viewsheds from the HCRH. At the least, the agencies must consider an alternative that would avoid impacts viewsheds from important viewpoints such as Mitchell Point.

Thank you for the opportunity to comment on this DEIS.

Sincerely,

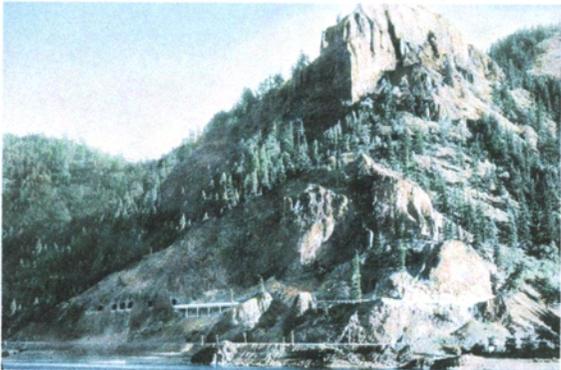
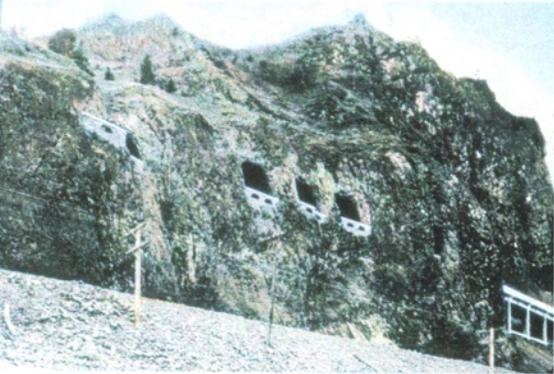
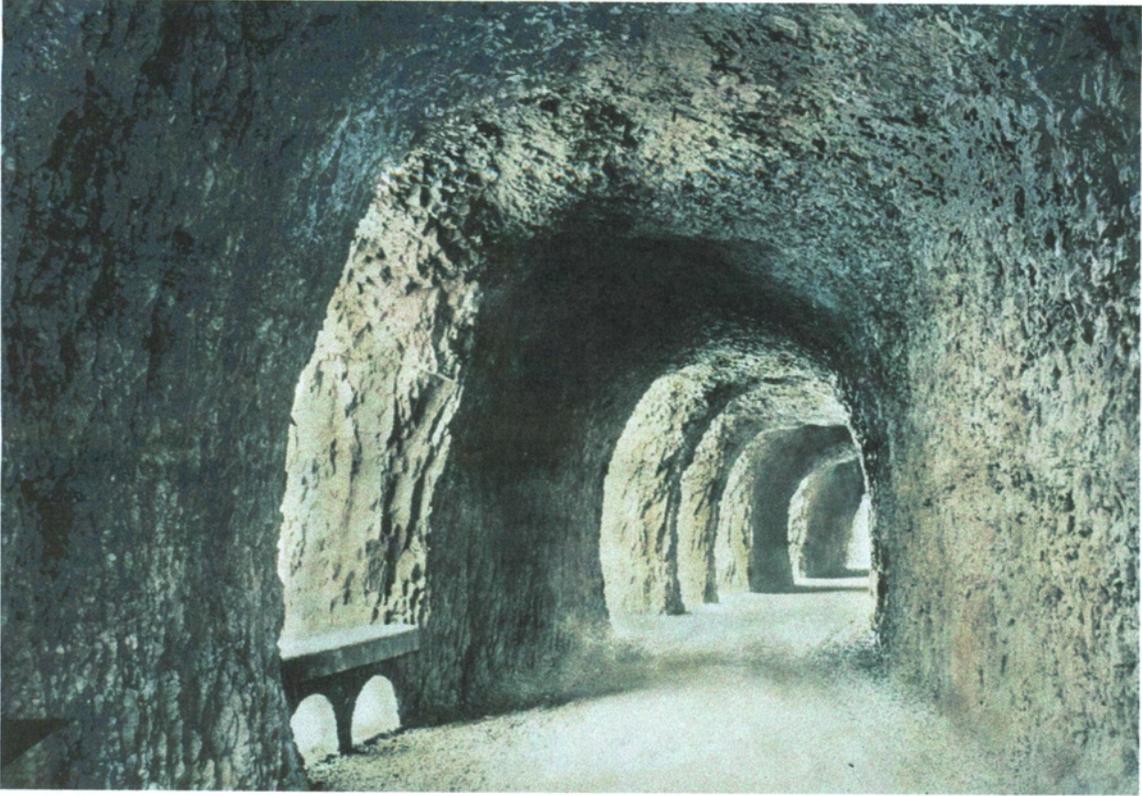
A handwritten signature in blue ink, appearing to read "Jeanette B. Kloos". The signature is fluid and cursive, with the first name being the most prominent.

Jeanette B. Kloos
President

View from Mitchell Point – 2010



Historic Views of Mitchell Point





8A

Segment 8 – Mitchell Point Tunnel

At this location, a tunnel originally connected the two intact historic highway segments on either side of Mitchell Point. The "Tunnel of Many Vistas" was 390 feet long and had five adits, or "windows," with magnificent views of the scenic Columbia River. The tunnel was 18 feet wide and 19 feet high at the crown. A viaduct was used to access the tunnel's west portal, and a cut into the hillside accessed the west end of this span. The state closed the old highway route through the Mitchell Point Tunnel in 1953 because of increased vehicle size and rockfall hazards. The tunnel and much of the approach route to the west, including the viaduct, were removed when the state removed the hillside to make room for full build-out of Interstate 84. The only remnants of the tunnel are narrow ledges at the west and east approaches. These benched areas are located about 200 feet above Interstate 84 and currently used as rockfall catchment areas in conjunction with other catchments adjacent to Interstate 84 below.

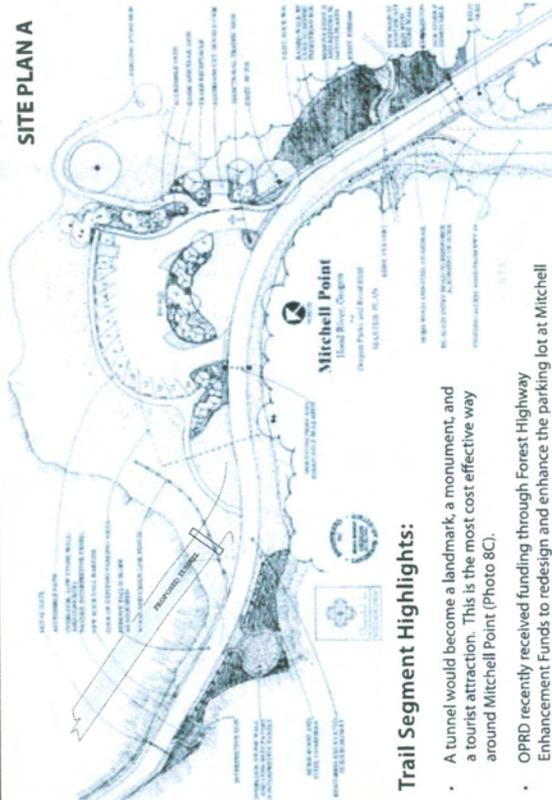
Reconstruction of Mitchell Point Tunnel would not only provide a way through Mitchell Point but also provide future trail users and visitors a unique way to experience the historic highway and Columbia River Gorge. In spring 2008, the Friends of the Historic Columbia River Highway contracted with GRI, geotechnical engineers, to prepare a geotechnical feasibility study for a new tunnel through Mitchell Point.

Their report envisions a tunnel that connects the two old highway segments east and west of Mitchell Point near the original grade of the historic highway. With a tunnel width and height of 18 feet and length of about 1,200 feet. Tunnel report includes three to five adits (windows) from the main tunnel to the cliff face to the north to provide viewing areas and allow for natural light. The west portal is located at the existing rock outcrop near the northeast corner of the parking area. The east portal requires a cut in soil and decomposed rock before tunneling can begin.

Photo 8A : Oregon Parks and Recreation Department recently received funding to enhance the parking lot and interpretive opportunities at Mitchell Point, a scenic, yet often overlooked wayside and State Park.

Photo 8B : View from the west side of Mitchell Point looking northwest at a striking view of the Columbia River Gorge.

Photo 8C : View from the east side of Mitchell Point looking northwest towards the Columbia River. Remnants of the historic highway are visible in the foreground.



8C

Trail Segment Highlights:

- A tunnel would become a landmark, a monument, and a tourist attraction. This is the most cost effective way around Mitchell Point (Photo 8C).
- OPRD recently received funding through Forest Highway Enhancement Funds to redesign and enhance the parking lot at Mitchell Point (Site Plan A, and Photo 8A).
- Most visually subordinate of the all options to get around Mitchell Point.
- Site is accessible to eastbound I-84 motorists.
- Incredible Columbia River Gorge views (Photo 8B).

Segment 8 – Preliminary Cost Estimate

Station	Item	Cost
0+00 to 12+00	1200LF Tunnel with 3-5 Side Adits (Per GRI Geotechnical Evaluation)	\$ 5,654,000
0+00 to 12+00	Trail (3' AC x 12 wide, 10" CR Base X 16')	36,000
0+00 to 12+00	Lighting (Allowance)	150,000
0+00	West Portal (For Rockfall Protection)	90,000
N/A	Traffic Control on I-84 (Allowance)	100,000
Raw Construction		6,030,000
Engineering & Permits (20%)		1,206,000
Construction Engineering (15%)		904,500
Sub Total		8,140,500
Contingency @ 40%		3,256,200
Estimated Project Cost (2008)		11,396,700
Estimated Inflation (2008-10)		1,139,670
Project Cost Estimate (2010) \$		12,536,370

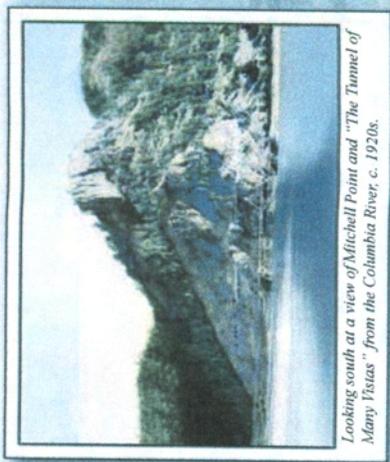
Please Note: Not all stations shown in the Preliminary Cost Estimate tables are shown on the segment Feasibility Maps.



8B

LEGEND

- EXISTING (INTACT) HOVH
- 2008 PROPOSED HOVH TRAIL
- PROPOSED TUNNEL
- ROCKFALL/EXCAVATION AREAS
- PHOTO VIEWPOINTS
- PROPOSED RETAINING WALLS
- ESTIMATED FILL SLOPE
- ESTIMATED CUT SLOPE
- POTENTIAL TRAIL-HEAD
- SECTION DRAWING
- PROPOSED BRIDGE
- PROPOSED CULVERTS
- VIEWPOINT
- POINT OF INTEREST
- CREEK/DRAINAGE



Looking south at a view of Mitchell Point and "The Tunnel of Many Histories" from the Columbia River, c. 1920s.

