



United States
Department of
Agriculture

Forest
Service

Columbia River Gorge
National Scenic Area

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Allen J. Fiksdal
EFSEC Manager
Energy Facility Site Evaluation Counsel
905 Plum Street SE
PO Box 43172
Olympia, WA 98504-3172

Dear Mr. Fiksdal:

It is my understanding that your office is accepting agency comment on the proposed Whistling Ridge Energy Project application for site certification. The Forest Service is submitting the following comment with respect to the Columbia River Gorge National Scenic Area--one of America's natural wonders known worldwide for its scenic beauty and the variety and quality of its recreational opportunities. Since the Scenic Area was created by Congress in 1986, new developments occur within a controlled framework that protects the resources that make the Scenic Area special. I understand that only a small portion of the proposal is located within the boundaries of the Scenic Area. This letter concerns impacts that will result from wind turbines visible from within the Scenic Area.

The purpose of this letter is to inform you of the risk of significant impacts to protected scenic resources if the proposed energy project is built as currently planned. This letter is not meant to imply that the project outside of the Scenic Area is regulated by the Scenic Area Act. In a letter dated May 8, 2008, the Columbia River Gorge Commission provided technical assistance in response to a request by the Oregon Department of Energy regarding a similar project in Oregon. In that letter, the Gorge Commission explained that the National Scenic Area Act specifically prohibits the implementation of a buffer around the boundaries of the Scenic Area. However, the letter also explains how Scenic Area resources would be affected by the project and how they could be protected. By requesting comments on the project, I assume that EFSEC would similarly benefit from scenic resources technical expertise in this matter.

Diana Ross, CRGNSA landscape architect, provided me the following analysis of the Aesthetics portion of the application starting on page 4.2-27. My comments are based on the findings of that portion of the application and the recommendations made by my staff:

1) **Key Viewing Areas (KVAs)**

As mentioned in the application, the effects to scenic resources in the Scenic Area are assessed by analyzing the effects of a project on lands visible from 26 selected public vantage points from which the public views the landscape. It was not foreseen at the time the Act was passed that any development outside of the Scenic Area would be seen from these viewpoints. However, it is clear from the application that several Scenic Area Viewsheds



(the land seen from these vantage points) will be affected.

9 of the 21 viewpoints analyzed are also Key Viewing areas (#6 & 9 were missing).

- 1-SR 141
- 4 & 22- Cook-Underwood Road
- 10-Panorama Point
- 11-I-84 Westbound
- 12-Koberg State Park (Columbia River)
- 13-I-84 Eastbound
- 14-Viento State Park (Columbia River)
- 19-Historic Columbia River Highway

2) **Methodology and Summary of Scenic Impacts**

There are many unknowns in the summary of methods on page 4.2-30-31 of the application. For example, the methods section did not disclose the heights used for the turbines or whether the software placed and sized the turbines or whether this was done in Photo Shop as an art project.

There are also several questions concerning the methods used to 1) choose viewpoints, 2) define visual quality and viewer sensitivity, and 3) represent and make conclusions about impact.

1) Choosing viewpoints in the Scenic Area should be based on Key Viewing Areas. Several of these were missing from the discussion (SR-14, Tom McCall Point) and others are linear viewpoints where only one or no views were picked in the NSA (Columbia River, Hwy 35, I-84, Historic Columbia River Highway). Therefore, it is unclear whether the impacts to NSA scenic resources were adequately captured.

2) The NSA is a nationally known and protected landscape of high quality and high sensitivity. All KVA scenic analyses should reflect this. The results of the applicant's analysis are heavily weighted on the assignment of existing scenic quality and viewer sensitivity. These methods were not tracked and do not represent the reality of the Scenic Area.

3) The conclusions made on the summary chart would more accurately be made using degree of contrast with the natural landscape both during the day and at night, and distance of the viewer from the project area. This assumes that the most visually impacted viewpoints have been found and that the simulations accurately depict the degree of contrast. The impact summaries starting on page 4.2-68 discuss these contrasts but the ratings do not reflect the discussion. For example the text for viewpoint #1 states that "the presence of the turbines would reduce the scene's degree of intactness by introducing a large number of highly visible engineered vertical elements" but the impact rating is low to moderate.

The Summary of Existing Scenic Quality and Project Visual Impacts on page 4.2-67 did not rate any viewpoint as having a high level of impact defined as: turbines "highly

3) Recommendations

In order to assure that the scenic resource impact is adequately analyzed, I recommend the following improvements to the scenic resource impact assessment:

- Include a discussion or summary of the most visible turbines,
- Include photographs of existing energy projects visible in the NSA,
- Do not use visual simulations (at a small scale with clouds in the picture) to depict the visual impact of visible turbines,
- Make certain that the most visible viewpoints have been covered, especially with respect to the linear viewpoints, and
- Make certain to include the night-time effects in your analysis.

In order to prevent the scenic impact of the turbines visible from the Scenic Area Key Viewing Areas, I also recommend that the applicant eliminate turbine locations found to be visible from Scenic Area KVAs. I am hopeful that close attention to these impacts will result in a solution which will fit the unique area that this project will potentially benefit.

Sincerely,

/s/ Daniel T. Harkenrider

DANIEL T. HARKENRIDER
Area Manager

cc: Jill Arens
Columbia River Gorge Commission