



United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
909 First Avenue, Fifth Floor
Seattle, Washington 98104-1060



IN REPLY REFER TO:
ER 09/423

May 18, 2009

Bonneville Power Administration
Public Affairs Office—DKC-7
Attn: Andrew M. Montaña
P.O. Box 14428
Portland, OR 97293-4428
bpa.gov/comment

Dear Mr. Montaña:

The National Park Service (NPS) has reviewed the Notice of Intent to prepare an Environmental Impact Statement (EIS), published in the Federal Register on April 21, 2009. The Bonneville Power Administration (BPA) and Washington Energy Facility Site Evaluation Council (EFSEC) will prepare a joint National Environmental Policy Act (NEPA)/State Environmental Policy Act (SEPA) EIS for a proposed 75 megawatt (MW) wind energy generation project to be located on 1,152 acres in Skamania County, Washington. The NPS has reviewed the Application for Site Certification Agreement (2009-01) (Application) submitted by WRE on March 10, 2009, and offers the following specific comments to the information and analysis provided therein.

The Whistling Ridge Energy (WRE) project is near the Columbia River corridor. While the NPS is supportive of the development of environmentally-sound, alternative energy technologies, we are concerned about the potential direct and cumulative effects of this renewable energy project on recreation and aesthetics in the Columbia River Gorge area.

On page 4.2-76, the Application states that “no national trails are within 5 miles of the proposed facility.” However, this statement is incorrect. Both the Lewis and Clark National Historic Trail and Oregon Pioneer National Historic Trail, administered by the NPS, pass through the Columbia River Gorge and are within 5 miles of the proposed facility. To provide more background on the national significance of these trails, historic travelers on these trails used both the river for downstream transportation and adjacent lands for eastward travel. When Congress designated these trails, it also authorized auto tour routes along Interstate 84 and Washington Route 14. The viewshed from both the river and auto tour routes is a critical part of the visitor experience. In addition to the national historic trails, the visual quality of the region is specifically protected by designation of the Columbia Gorge National Scenic Area (CGNSA) in 1986. These three national resources are independently significant, but the close proximity of all three to each other creates a unique recreational opportunity for visitors to the region. It is important for the NPS to ensure that the scenic and historic values of these areas

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are preserved from gross alteration of the landscape and viewshed by large-scale industrial development.

Because the WRE project is proposed to be immediately adjacent to the CGNSA boundary, some, if not all, of the proposed 50-turbine project will be visible from within the CGNSA, as described in the visual analysis (Section 4.2) of the Application. About 400 acres of the proposed project (including turbine corridor A1-A7, which will be closest to the CGNSA boundary) are within areas zoned Resource Protection (For/Ag-20) and Residential 10 (R-10) under current Skamania County code. Construction of wind turbines in this area will require a conditional use permit from Skamania County, partially due to the fact that the proposed wind turbines are taller structures than currently allowed in these zones.

We disagree with the level of severity for view impacts suggested in the Application. First, the Application cites dated information regarding viewer perception. In 1987, a survey reported by Thayer and Freeman, reflected both positive and negative attitudes to wind generators, page 4.2-28. This information is inadequate, because at that time, the combined national capacity was less than 2,000 MW. As of 2006, capacity exceeded 12,000 MW, and has likely increased since then, especially given increased emphasis on renewable energy development at both the national and state levels. Moreover, since 1987, the size of turbine infrastructure has increased. Towers are now taller. With taller and more prolific wind turbines, the potential for negative impacts to viewsheds is greater.

Second, the actual size of a feature on the landscape is not the only component in considering viewshed impacts. The Columbia River Gorge area is significant because of the area's scenic and historic qualities. Man-made structures, especially when movement of a structure acts as an additional point of focus, depreciate the scenic and historical qualities that originally warranted national protection. We are concerned with the cumulative impacts to the viewshed resulting from numerous uniform wind turbines extending beyond the horizon line within an open, natural landscape.

We also note that the Application did not adequately cover all of the important viewpoints that should be considered. The Draft EIS should include all of the local Key Viewing Areas identified within the CGNSA, as well as address key viewpoints from the Columbia River that may be potentially impacted. Linear viewpoints from the designated scenic drives and auto tour routes should also be fully considered in the Draft EIS.

The methods used for the visual analysis (Section 4.2) were unclear in some respects. It was not disclosed what heights were used for turbines in generating the simulated scenes, and whether those were placed in the photos by the analytical software or within a photo editing program. Photos used for simulation should not include cloudy or hazy conditions; a clear, blue sky will better illustrate the extremes of contrast between towers and the background.

On page 4.2-66, a footnote in the Application states, "Additionally, for reasons related to commercial viability and engineering feasibility, the project is proposed as an integrated whole, not a series of separate components where parts of the whole may be removed due to subjective, perceived visual effects." The NPS disagrees with this characterization of visual

effects, as the statement appears to suggest that because assessment of visual resources can be a fluid process, it lacks any objectivity or reliability, and is therefore less meritorious when weighed against the concreteness of engineering feasibility and the economics of commercial viability. Impacts to views are not purely subjective and are not merely "perceived," but can be agreed upon and very real. We believe it is clear, even at this early stage, that visual impacts to the CGNSA and the national historic trails will degrade the core scenic and historic landscape values of these resources. We strongly recommend at minimum removing turbine corridor A1-A7 from further project consideration. This would help reduce the impact to visual resources within the CGNSA and along the national historic trails.

There are certain advantages for developing a wind farm at the proposed location. Natural and cultural resource surveys suggest that few negative impacts are likely to result from the proposed project. Most of the property will remain in commercial forestry operations. Access to BPA transmission lines obviates new line siting and construction. The potential enhancement to local employment and property tax revenues, while small, are still important in this economically depressed county.

Slightly decreasing the total turbines through removing turbine corridor A1-A7 of the proposed project will likely not hinder its viability while alleviating some of the negative visual impacts.

The NPS anticipates having further comments as the NEPA/SEPA process proceeds for the Whistling Ridge Energy project. If you have any questions, please contact:

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Sincerely,



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