



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
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Portland, Oregon 97205-3026

9043.1
IN REPLY REFER TO:
ER10/492

Electronically Filed

July 19, 2010

Andrew M. Montaña
Environmental Project Manager
Bonneville Power Administration – KEC-4
P.O. Box 3621
Portland, Oregon 97208

Dear Mr. Montaña:

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Bonneville Power Administration's Whistling Ridge Energy Project, Skamania County, Washington. The Department offers the following comments for use in developing the Final Environmental Impact Statement for the project.

Lewis and Clark National Historic Trail

The proposed Whistling Ridge Energy project is located within five miles of the Lewis and Clark National Historic Trail (NHT), a congressionally-designated NHT, which follows the Columbia River and is within the area analyzed in the DEIS for potential visual impacts. In addition, US Interstate 84 and Washington Route 14 are the state-designated Lewis and Clark auto tour routes in the project area. Many visitors experience Lewis and Clark NHT by traveling the auto tour routes and stopping at interpretive and recreational sites along the way. The Department considers the viewshed along the river and auto tour routes to be a critical part of the trail visitor experience.

The Lewis and Clark NHT was established by Congress in an amendment to the National Trails System Act in 1978. 16 U.S.C. § 1244(a). As administrator of the trail, the National Park Service (NPS) is charged under this Act with the identification and protection of the historic route, remnants, and artifacts of the trail for public use and enjoyment.

Based on the analysis of visual impacts in the DEIS, it appears that a varying number of turbines will be visible from the trail's historic river and auto tour routes from near

Koberg Beach State Park to Lindsey Creek State Park. This approximately 15-mile stretch of the Columbia River Gorge has numerous recreational opportunities and scenic views that add significantly to enjoyment of the historic trail. Of the five viewpoints along US Interstate 84 analyzed in the DEIS, Viewpoint 14 at Viento State Park, is rated in Table 3.9-2 as having an anticipated moderate to high level of visual impact. However, on page 3-193 of the DEIS, the potential visual impact for this viewpoint is stated as only moderate. Furthermore, it appears that the turbines were inadvertently omitted in the photomontage in Figure 3.9-11. While difficult to discern the impact at this location without clarification on the accuracy of the visual simulation, we believe that the impact should be rated as high given the placement of turbines on the skyline within four miles of a park located along the auto tour route.

Turbine string A1-A7 would be highly visible from numerous locations along the trail due to its placement on a ridgeline close to the Columbia River Gorge. The NPS recommends removing or relocating these seven turbines, if feasible. This would significantly reduce the impact to visual resources along the historic trail. The visual resources in this region—Columbia River Gorge National Scenic Area and Lewis and Clark NHT—are important resources that should be protected.

Please add the following people to the federal agency distribution list for this project:

Dan Wiley
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Lewis and Clark National Historic Trail
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SPECIFIC COMMENTS

Water Resources Section 3.3

Pg. 3-26: Section 3.3.1.3 lacks sufficient information on the existing groundwater environment to support the finding of little or no impact. Suggest the section more fully address the depth to groundwater, flow direction, and transmissivity (permeability) of the aquifer as it relates to possible affects on the area domestic and agricultural ground-water resources (also see section 3.3.1.5). Helsel et.al. (2002) is a good reference for this type of analysis.

Pg. 3-29: Because section 3.3.3 addresses mitigation procedures for the isolation of groundwater from chemical spills, we assume that chemicals will be present on site during both construction and operation. Suggest the document include a discussion of potential chemical spills, and aquifer transmissivity (permeability), as it relates to the potential movement of contaminants toward nearby domestic or agricultural water wells.

Reference

Helsel, D.R. and Hirsch, R.M., 2002, Statistical methods in water resources: U.S. Geological Survey—Techniques of Water-Resources Investigations Book 4, Chapter A3, 510 p. Available on the internet at: <http://pubs.usgs.gov/twri/twri4a3/>

Thank you for the opportunity to review and comment on this DEIS. If you have any questions concerning the NPS comments, please contact Dan Wiley at (402) 661-1830 or at Dan_Wiley@nps.gov, or Lee Kreutzer at (801) 741-1013 (x118) or at Lee_Kreutzer@nps.gov. If you have any questions concerning the USGS comments, please contact Gary LeCain, USGS Coordinator for Environmental Document Reviews, at (303) 236-5050 (x229) or at gdlecaain@usgs.gov. If you have any other questions, please contact me at (503) 326-2489.

Sincerely,



Preston A. Sleeper
Regional Environmental Officer