

ENERGY FACILITY SITE
EVALUATION COUNCIL

To: Washington State Energy Facility Site Evaluation Council

From: Wirt T. Maxey

Re: Comments about the Proposed Whistling Ridge Energy Project

Date: January 5 2011

**THE PROPOSED WHISTLING RIDGE ENERGY PROJECT IS
ILLEGAL UNDER TITLE 22 OF THE SKAMANIA COUNTY CODE**

Background Facts:

Whistling Ridge Energy LLC is proposing a wind farm in an area of Skamania County which is located just outside the boundaries of the Columbia River Gorge National Scenic Area. (NSA) The proposed wind turbines are 430+/- feet tall and must be equipped with strobe lights at the top to satisfy FAA regulations. Cook Underwood Road is a designated "Key Viewing Area" within the NSA, located in Skamania County. Many, if not all, of the proposed turbines and the strobe lights thereon will be highly visible from the Cook Underwood Road Key Viewing Area, as well as from numerous Key Viewing Areas throughout the NSA.

Issue: Is the proposed project legal under Title 22 of the Skamania County Code (Title 22)?

Summary: Although the National Scenic Area Act prohibits the creation of buffer zones¹, there are no provisions in The Act which prevent Skamania County, or any other governmental entity with jurisdiction, from protecting the NSA from scenic intrusions originating from outside the Scenic Area. For example, Oregon has recognized this principal. The Oregon EFSC provides that before issuing a site certificate the Council must determine by a preponderance of evidence that there will be no significant adverse impacts to the scenic, aesthetic, recreational, and wildlife resources of the Columbia River Gorge. OAR 345-022-0000(1)(a).

Title 22 includes numerous provisions demonstrating that Skamania County, like Oregon, has protected the NSA Key Viewing Areas within Skamania County from scenic intrusions originating from both inside and outside the Scenic Area.

Conclusion: Title 22 protects the “Viewshed” of Cook Underwood Road, and requires that any development which can be seen from Cook Underwood Road be “Visually Subordinate” to its setting as seen from Cook Underwood Road. Because the proposed Whistling

¹ “SEC. 17 SAVINGS PROVISIONS.

(a) Nothing in sections 544 to 544P of this title shall-
(10) establish protective perimeters or buffer zones around the scenic area or each special management area. The fact that activities or uses inconsistent with the management directives for the scenic area or special management areas can be seen or heard from these areas shall not, of itself, preclude such activities or uses up to the boundaries of the scenic area or special management areas. 16 USC 544o (a)(10).”

Ridge Energy Project cannot meet the test of visual subordination the project is illegal. The proposed project violates both the letter and the spirit of Title 22.

Analysis Section 22.02.050 of Title 22 provides, in pertinent part, that “This title applies to all lands in that portion of Skamania County lying within the Columbia River Gorge National Scenic Area...and to no other lands within the county...” The Cook Underwood Road Key Viewing Area lies within the National Scenic Area. Thus, Title 22 applies to the Cook Underwood Road Key Viewing Area.

“Viewshed” is defined in Section 22.04.010 as “a landscape unit seen from a key viewing area.”²

“Development” is defined in Section 22.04.010 to mean “any land division or structure, including but not limited to new construction of buildings and structures, and mining, dredging, filling, grading, paving and excavation.”

Section 22.04.010(j) of Title 22 designates Cook Underwood Road as a “Key Viewing Area”.

² “Landscape Unit” is an undefined term and must therefore be given its’ ordinary and common meaning, which would include any structure which is visible from a key viewing area.

Section 22.18.030 entitled "ADDITIONAL STANDARDS GOVERNING NEW DEVELOPMENTS VISIBLE FROM KEY VIEWING AREAS" provides extensive standards for developments, such as the Whistling Ridge Energy Project, which are visible from key viewing areas. Section 22.18.030A provides that "The provisions in this section shall apply to proposed developments on sites topographically visible from key viewing areas". **Thus, to the extent any of the turbines and/or their strobe lights are visible from Cook Underwood Road, (or any other key viewing area) the requirements of Section 22.18.030 must be met.**

In order to meet the requirements of Section 22.18.030B, the portion of the Whistling Ridge Project which is visible from Cook Underwood Road must be "visually subordinate to its setting as seen from" Cook Underwood Road. Visually Subordinate is defined in Section 22.04.010 as follows:

"Visually Subordinate" means a description of the relative visibility of a structure or use where that structure or use does not noticeably contrast with the surrounding landscape, as viewed from a specified vantage point, generally a key viewing area. As opposed to structures that are fully screened, structures that are visually subordinate may be partially visible. They are not visually dominant in relation to their surroundings. Visually

subordinate forest practices in the SMA shall repeat form, line, color, or texture common to the natural landscape, while changes in their qualities of size, amount, intensity, direction, pattern, etc., shall not dominate the natural landscape setting". (Emphasis added).

Clearly, the proposed wind turbines and their strobe lights which are visible from Cook Underwood Road can not pass the test of visual subordination.

Additionally, Section 22.18.030L of Title 22 provides that "Exterior lighting shall be directed downward and sided, hooded and shielded such that it is not highly visible from key viewing areas". Section O. provides that "The silhouette of new buildings shall remain below the skyline of a bluff, cliff or ridge as seen from key viewing areas". Clearly, the proposed Whistling Ridge project cannot pass these tests.

The project's proponents are likely to point to the language in Section 22.02.050 of Title 22 stating that "This title applies to all lands in that portion of Skamania County lying within the Columbia River Gorge National Scenic Area...*and to no other lands within the county...*" and argue that, based on the italicized language, Title 22 is not applicable to the proposed project because it lies (in some cases

approximately just 60+/- feet) outside the NSA. While it may be true that the project lies outside the NSA,³ it is undeniable that Cook Underwood Road does lie within of the NSA. It is also undeniable that some or all of the turbines and their strobe lights will be highly visible from Cook Underwood Road and therefore lie within the view shed of Cook Underwood Road. Application of Title 22 to the Cook Underwood Road "Key Viewing Area" results in the proposed project being illegal, because the proposed project would impact the Cook Underwood Road view shed in a manner that is prohibited by Title 22.

Section 22.02.050 merely states that lands lying outside the NSA boundaries are not entitled to scenic protection and in no way whatsoever states or implies that Key Viewing Areas within the NSA are not protected from scenic intrusions originating outside the boundaries of the NSA.

The project's proponents may also point to section 22.02.120(A)(10) of Title 22 and argue that, since Title 22 does not create "buffer zones", Title 22 does not apply to the project. Section 22.02.120(A)(10) provides:

A. Nothing in this Title shall:

³ The proposed project is so close to the NSA, that an on the ground survey should be required to insure no encroachment.

10. Establish protective perimeters or buffer zones outside of the Columbia River Gorge National Scenic Area.

“Buffer Zone” is a defined term in Title 22, therefore in order to interpret section 22.02.120(A)(10) it is necessary to consider and apply the statutory definition of “buffer zone”. Section 22.04.010 (18) of Title 22 provides:

18. **BUFFER or BUFFER ZONE** means an area adjacent to a water resource or other sensitive area that is established and managed to protect sensitive natural resources *from human disturbance*. In instances that involve a wetland, stream or pond, the buffer zone includes all or a portion of the riparian area.(emphasis added)

Reading section 22.02.120(A)(10) in conjunction with the statutory definition of “buffer zone” makes it plain that the prohibition against buffer zones in no way detracts from the protection given to key viewing area viewsheds elsewhere in Title 22. ***Rather, it merely provides that nothing in Title 22 shall be interpreted to protect areas outside the NSA from “human disturbance”.*** WRE is legally entitled to disturb the project areas outside the NSA however they wish (subject to Skamania County Zoning and Comprehensive Plan limitations), so long as the project doesn't impinge on the protection granted Key Viewing areas elsewhere in Title 22.

If title 22 had been intended to limit the protection granted key viewing areas to intrusions originating from within the NSA, then the definitional and other sections referenced herein would have been so written and so limited and SCC 22.02.120(A)(10) would read something like; ... 'Establish protective perimeters or buffer zones outside the NSA, or prohibit visual intrusions on key viewing areas which originate from outside the boundaries of the NSA.' Alternatively, the definition of "buffer zone" would have been written differently to specifically negate the scenic protections granted key viewing area viewsheds elsewhere in Title 22.

Although the National Scenic Area Act prohibits the creation of buffer zones, there are no provisions in The Act which prevent Skamania County, or any other governmental entity with jurisdiction, from protecting the NSA from scenic intrusions originating from outside the Scenic Area. As previously stated, Oregon has recognized this principal. See OAR 345-022-0000(1)(a).

Title 22 includes numerous provisions demonstrating that this Ordinance protects the NSA Key Viewing Areas within Skamania County from scenic intrusions originating from both inside and outside the Scenic Area. Title 22 clearly asserts jurisdiction over visual impacts seen from Cook Underwood Road which originate from

outside the NSA boundaries and clearly prohibits intrusions on the Cook Underwood Road view shed which originate from outside the NSA.

Viewshed is defined in Section 22.04.010 as “a landscape unit **seen from** a key viewing area”. (emphasis added) This definition is **not** limited to landscape units which originate from within the NSA boundaries.

Section 22.04.010 provides that “Development means **any** land division or **structure**, including but not limited to new construction of buildings and structures, and mining, dredging, filling, grading, paving and excavation.”(emphasis added) Section 22.04.010 **does not** define development to mean “any land division or structure, including but not limited to new construction of buildings and structures, and mining, dredging, filling, grading, paving and excavation **within the National Scenic Area Boundary**” The definition or the term “development” **is not limited** to developments which are located **within the NSA boundaries.**

Section 22.18.030A provides that “The provisions in this section shall apply to proposed developments on sites topographically visible from key viewing areas”. Section 22.18.030A **does not state** “...shall apply to proposed developments on sites **within the National Scenic**

Area Boundary topographically visible from key viewing areas". The protection afforded the Cook Underwood key viewing area view shed by Section 22.18.030, is not limited to protection from visual impacts of development located within the NSA boundaries.

Section 22.18.0300 also demonstrates that Title 22 protects the Cook Underwood Road key viewing area from scenic impacts originating from outside the NSA boundaries. Section O. provides that "The silhouette of new buildings shall remain below the **skyline** of a bluff, cliff or ridge as seen from key viewing areas".(emphasis added) This section **does not state** that "The silhouette of new buildings **within the National Scenic Area Boundary** shall remain below the skyline of a bluff, cliff or ridge as seen from key viewing areas".

"Skyline" is defined by Section 22.04.010 as follows: " Skyline means the line that represents the place at which a landform, such as a cliff, bluff of ridge, meets the sky, as viewed from a specified vantage point, only a key viewing area... " Once again, this definition is **not limited** to skylines within the NSA.

As well, as a matter of fact, the only "skyline of a bluff, cliff or ridge" within Skamania County which can be seen from the Cook Underwood Road Key Viewing Area is from looking in a Northerly direction, towards the proposed project. Cook Underwood Road itself

is located on the Underwood bluff and to the south the topography slopes downward to the Columbia River. Oregon lies on the other side of the river.

Pursuant to well established rules of statutory construction, if Title 22 had been intended to protect the view shed of the Cook Underwood Road Key Viewing Area (or any other key viewing area) only from visual impacts originating from within the boundaries of the NSA, the Ordinance would have specifically done so by including that limitation in the definitional sections discussed above. **Since no such limitations exists in Title 22, it is clear that the View Shed of Cook Underwood Road is protected by the express provisions of Title 22 from visual impacts originating from both within and outside of the NSA boundaries.**

Title 22 includes numerous provisions demonstrating that Skamania County, like Oregon, has protected the NSA Key Viewing Areas within Skamania County from scenic intrusions originating from both inside and outside the Scenic Area.

THE PROPOSED WHISTLING RIDGE ENERGY PROJECT IS ILLEGAL UNDER TITLE 22, BECAUSE IT CANNOT PASS THE TEST OF VISUAL SUBORDINATION.

Respectfully Submitted

Wirt T. Maxey

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Comments to EFSEC

Whistling Ridge

January 5 2011

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ENERGY FACILITY SITE
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Frank Backus

■ Hwy 141

White Salmon Wa.

Commissioners, thank you for the opportunity to testify today on the Whistling Ridge project.

I am in favor of this project and urge you to approve the sighting of this project as applied for. Some reasons I believe warrants sighted of this project are:

1. Whistling Ridge will help the local economy
 - a. With new employment during and after construction
 - b. New property tax revenue
 - c. Diversify and strengthen SDS and BLC witch will helping them to weather poor economic time and sustain long term employment levels.
2. No significant impacts were found to the environment ie. wildlife, vegetation, water or soil
3. No significant impacts to cultural/tribal resources were found.
4. Wind Turbines are compatible with the surrounding land uses, which are Forestry and Agriculture.
5. Scenic Issues.
 - a. Whistling Ridge is outside the NSA, therefore the NSA Act has no jurisdiction and has no legitimate bearing on the project.
 - b. SR 141(Lewis & Clark Hwy) The view from this hwy of Whistling Ridge is very limited and wind turbines already exist along this hwy that are much closer.
 - c. Lewis & Clark Trail and the Oregon Trail. The locations of both of these trials are under 20 to 30 feet water in this area. I do not think that turbines can be seen from inside a submarine or through a scuba diving mask 20 feet under water.
6. Whistling Ridge will provide 75 MW of renewable energy that the Washington Voters have **Mandated** must be a part of electric energy used in Washington.

Thank you .



Washington State Energy Facility Site Evaluation Council

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Whistling Ridge Public Comment Meeting
Public Hearing and Comment Opportunity

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Name: Stelley Baxter

Address: [Redacted] Cherry Hill Ln. White Salmon WA 98672

Email Address: [Redacted]@gorge.net
(Please include your Zip!)

Add me to the Mailing list

Please write any comments you have with respect to the

Leave this sheet in the Comment Box today, or mail it to:
EFSEC, PO Box 43172, Olympia, WA 98504-3172.

Comment letters must be postmarked by Saturday, January 15, 2011.

I believe that the negative impact on our local tourism economy must be considered in siting this facility. As a small business owner I know this unsightly industrial-size installation will not help our business in White Salmon.

Stelley Baxter, owner
White Salmon Boat works

Use the back of this form if you need more room for your comments.

For more information, please contact:
Stephen Posner, Siting Specialist, PO Box 43172, Olympia, WA 98504-3172,
call (360) 664-1903, or e-mail efsec@utc.wa.gov.

Good afternoon. I am Jim Minick. I have lived in the Scenic Area for 23 years. I am a property owner and pay taxes in Klickitat County. I am completely opposed to the Whistling Ridge wind turbine project. The Columbia River Gorge was set aside as a special management area by an act of Congress and designated as a National Scenic Area. My objection to this project is that the Visual Impact is completely unacceptable. People come here to spend money as tourists and others live here because of the scenic character of the Gorge. An industrial wind turbine farm on a prominent ridge in the middle of the Gorge destroys those scenic qualities forever.

If this were approved, it would be only the beginning, the foot in the door. The Stevenson family owns thousands of acres of forested land on both sides of the Columbia. A few years from now, numerous ridge tops ringing the entire Gorge could be covered with wind turbines if they have their way. They will clear cut the forest, as they have Whistling Ridge, build their wind farms, make lots of money and the rest of us have to look at this newly industrialized "Scenic" area for the rest of our lives here.

This is not about being a "good neighbor". It is about making as much money as possible. What if I owned the land just down hill of the Stevenson's home. And what if I wanted to put a wind turbine right in the middle of their beautiful view of Mt. Hood or the Gorge. And what if they objected, and I said "too bad". Is that being a good neighbor? How about the SDS gravel pit slide on the east end of Bingen about 16 months ago. They mined outside their permit area, slid a section of their neighbor's property down the hill destroying its grazing value, then announced the next day that all was well, there was no danger. Washington State came in the day after that, announced that is was in fact a dangerous situation and shut down their gravel operation.

They are not proposing this project in order to be good neighbors. They are doing it in spite of hundreds of their neighbor's objections in order to increase their wealth. And the rest of us have to pay every day by looking at their wind turbines. If I were a tourist related business in Hood River or White Salmon I would be completely outraged. You feel free to hurt those businesses in order to increase your own profits.

There is a good place for wind turbines. It is out in eastern Klickitat County and eastern Oregon. Fifty additional turbines there would hardly be noticed. This is a Good Technology located in exactly the Wrong Place.

No Turbines in the Gorge. No Turbines. No Turbines.

Jim Minick
Wilkins Dr.
Lyle, Wa. 98635

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Public Input

Whistling Ridge Project Public Hearings - January 5 and 6,
2011

This is our life, and it is the only one we have. We have choices about our individual lives. When it comes to all citizens as a whole it is our responsibility to do the best decision making possible. We all compromise, for the good of all, using our own personal ethics and personal values. From our driving, our eating, our cleaning, our refuse disposal, our home construction, our heating and cooling systems, our clothing, everything we do is our choice and we do the best we can with what we have available. We work for change and we continually compensate and compromise in our own lives, as well as in decisions that involve others. So we must do today regarding wind power.

Wind power - may harm some birds, just like the windows of my home, which I paid to have anti-glare, still kill a few birds each year, I compromise, I have windows for the light which certainly improves my personal well being, then I provide assistance to the birds in a variety of ways to help their survival in my chosen living environment of forest and field. I make choices and I try to compromise and compensate in all I do in my life. I live in a wood house and I manage ~80 acres of timber.

Wind power - may create noise, disruptive to humans and wildlife you may say - like the noise I hear everyday, some continuous and some off and on. The barges/tugs on the river, the trains on both sides of the river, the trucks and cars on our roads, the generators from the fish hatchery, the sirens of alarm from the fish hatchery and fire station, the airplanes, the chain saws of home wood cutters and timber harvest operations, and the voices of people. Yet I have a broad variety of healthy wildlife on my property where I live, black bear, cougar, bobcat, turkey, hawks and eagles, coyote, raccoon, weasel, elk and deer, the list just goes on and on. These animals live healthily along with my family and these disturbances.

Reflections, we see them all the time, through the trees from vehicles on the road, from airborne vehicles, the neighbor's lights, they come and

they go, and they do not detract from the quality of life I experience. And any reflections from the windmills will be the same.

Views - We see disruptive, as in not native, objects on a daily basis, our own homes, all those white houses on the ridges and mountains, along with their lights at night, sheds and outbuildings, cars, tractors, lawn mowers, garbage cans, garbage trucks, delivery trucks, lumber, trailers, etc. We see roads, forest operations, man made fields, other folks homes, business buildings, towers, power lines, bridges, railroads, people and more people. These all become part of our daily view and we adjust to the point (by choice) that they do not interfere with our quality of every day life.

It is all a matter of your personal choice, of how you will allow the normally viewed necessities of life and the freedom of choice of others to impact you.

I would rather have the disruption of wind power generators than a biomass plant, or any other newly constructed power generating system I am aware of, except perhaps one in the sky. Also, I would really like to have as many of us as possible producing our own power right beside, on, or over our own home. We have choices now, and I believe we should be taking advantage of these opportunities, and encouraging businesses to do the same, not stopping a model project because we might be able to see it.

I am proud to say we in the Gore are doing our best to accommodate the production of alternative energy sources, a renewable and relatively impact free project. Except for the views you say? Really are we so selfish we cannot take advantage of this project instead of trying to send it to someone else's backyard? Tell your selves and friends how the towers represent a successful renewable energy project and the towers, situated on a ridge, still blend in with the forest and the sky, leaving no significant environmental impacts except showing us where they are and that they are working for us! After all we the people are benefiting from electrical power generation. The towers will not degradate the beauty of the Gorge, in fact they will show how we have retained the forest and mountains of the Gorge and still built a model alternative energy production project. We are an example of people and

environmental protection working together. We have the dams of times past; we now are embracing new alternatives. Soon perhaps, we will be able to see a new energy production system up in our sky, one which will reflect light and yet when our grandchildren ask what is that light grandma, I can proudly say that thing in the sky produces the electricity we use to heat our house so you can be warm as you snuggle in your bed tonight.

We are so fortunate to live where we have the freedom to provide input and value to an action our neighbor chooses to take on his own private property. Let's us open our minds to working together, together to make our neighbor's project work for the best of us all, for all citizens, rather than try to stop it.

We are all going to be neighbors for the rest of our lives, at least in my case, so come on, let's work together and make this happen in the best way possible. At the least we can be thankful we will not be driving practically under the wings of our power towers!

All three of my children were married in outdoor environments, one on a lakeshore, one on an organic vegetable farm, and one on the mountainside of the Big White Salmon River. At each one there were views, views of things when originally constructed were probably objected to because of "view degradation", noise, or similar. Yet they were each absolutely beautiful. The cell towers at one site, the homes and boats at another, and the barns, farm animals, roads, and distant cities did not detract one little bit from the lifelong memorable event we experienced. Life is in our hearts and soul, and in our own choice of perception we create. Beauty is in the eye of the beholder, and that is so very true. What wonderful friends we would all be if we each took time to step back and think about the big picture. I think life is too short to do anything else. Be happy, help others, love your family, and enjoy.

I have to add however; do you think the things could be painted camo?

Thank you!

Anita Gahimer Crow
Cook-Underwood Road Resident

██████████ Fouts Road Mill A / cook

WA, 98605

██████████ @Kuneticsinc.com

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1. Glen Holmberg, Underwood WA
[REDACTED] Scooter Rd.
2. I oppose this project
3. Visual impact. Thousands and thousands of people come here each year to take in the view. This is a unique place in the world. Many people have changed their lives to move here for the outdoor lifestyle. Wind turbines are in direct conflict with that lifestyle.
4. ^{ELS} The environmental impact statement mentions the view from the Hood River Hospital, and describes it as an urban area and that it will have a low visual impact. It doesn't talk about the view from the waterfront park, the Columbia Gorge Hotel, and countless other restaurants and businesses. It also doesn't mention the view from the hundreds of recreation areas throughout the Gorge.
5. I also believe it will lower property values in Underwood. I own a home near here, and I don't think I'd buy here again if there were turbines near by. I've heard people talk about wind turbines as tourist attractions. I believe this is wishful thinking at best.
6. Put these wind turbines somewhere else not adjacent to the National Scenic Area.
7. Finally, I've heard SDS say that they need all the turbines to make this financially viable. A possibly compromise would be to not build the turbines that can be seen from the Gorge. I'd like to see some hard data to back this up, not just "because I said so".



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Name: Christina Baghdanov ENERGY FACILITY SITE
Address: ██████ W 8th St. #2 The Dalles OR 97858 EVALUATION COUNCIL
(Please include your Zip!)

Email Address: _____

Add me to the Mailing list

Please write any comments you have with respect to the

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EFSEC, PO Box 43172, Olympia, WA 98504-3172.

Comment letters must be postmarked by Saturday, January 15, 2011.

I'm a student of the Renewable Energy program at
the Columbia Gorge Community College. I support this new
wind project. The NW is a leader in renewable energy
and we should strive to maintain that. This new wind project
will not only benefit the local community by creating approx.
150 construction jobs, and then 8 permanent jobs, it will also
contribute to the Green energy mix in the electric grid. By developing
wind farms further west of existing wind farms it will create
a more reliable supply of wind power.

As for those with aesthetic concerns as a wind turbine is
not an ugly machine on the hillside, rather it's a symbol that represents
our forward thinking, our commitment to protect our environment.

Use the back of this form if you need more room for your comments.

For more information, please contact:
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call (360) 664-1903, or e-mail efsec@utc.wa.gov.

not just for ourselves but for future generations. Ask yourself this question: Would you rather see a slow moving white turbine dancing in the distance or ~~smog~~ smog and smoke from the coal burning powerplants rolling across the hills?

In the end, it doesn't matter who gets the clean energy created from these turbines, whether it's Washington or California. It's all for the greater good of the nationwide community.

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Name: Patti Hargrove

Address: PO Box [redacted] Underwood 98651

Email Address: [redacted]@gmail.com
Please include your Zip!

Add me to the Mailing list

Please write any comments you have with respect to the

Leave this sheet in the Comment Box today, or mail it to:
EFSEC, PO Box 43172, Olympia, WA 98504-3172.

Comment letters must be postmarked by Saturday, January 15, 2011.

The visual impact this will have on our area I feel is negative. These towers are so huge, they will create an eye sore. The flashing lights will be very ^{+ unsightly} distracting. I'm not against wind power but the area suggested just doesn't fit in to ^(scenic) forested surroundings. Eastern Oregon + Washington ^(open area) are better suited to wind generators with less impact on wildlife. Transportation could be an issue during construction. It could ^{+ will be} be a safety problem in case of an emergency. Plus the general traffic congestion.

Use the back of this form if you need more room for your comments.

For more information, please contact:
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call (360) 664-1903, or e-mail efsec@utc.wa.gov.

The number of wind energy sites currently operating, approved, and/or pending approval, plus the availability of other sites with less environmental and resource impacts make the Whistling Ridge Energy Project unnecessary, inappropriate and incongruous for this area.

There is only one Columbia Gorge National Scenic Area on this entire planet. A tiny parcel set aside, federally protected, providing for the *enhancement* of the *scenic*, cultural, recreational, and *natural resources* of the Columbia River Gorge. 426' wind turbines immediately adjacent to and within the viewing areas of the Scenic Area are not enhancement of this spectacular natural environment.

Aside from the visual impact of 426' wind turbines towering above the 75-100' indigenous firs, this project has myriad impacts. To emphasize a few, consider the following: The use of our taxpayer dollars via government subsidies as funding. In effect *we* will pay to build the private facility that sends the power to other areas, and then pay yet again to power our homes - so no one gains except the wind farm owner. Whistling Ridge is a very small project, generating power of less than 1%, and is located in an inefficient power generation area. According to energy studies, anticipated wind power need is already met by available or pending projects, plus the grid can't handle additional input. There are potential health issues for residents living near the turbines. Underwood Road is very poor access - narrow and winding- creating safety issues for residents and emergency vehicles during construction. Wildlife populations are at risk. *National Geographic Traveler* ranked the Gorge 6th in the world as an iconic destination drawing international travelers. Local businesses sustained by tourism will suffer due to decimation of the scenic vistas. The list goes on.

It is personal accountability that of each and every one of us be responsible stewards of *our* natural treasures, including protecting the unique, awe-inspiring, natural vistas of this region. This is not about subjective personal preference for or against the visual like or dislike of a wind turbine. Rather, it *is* about preserving a wild, scenic, forested area from industrial development, and its underlying issues, many of which are never apparent at the onset.

It is tragedy to destroy this splendid forested region by allowing it to be turned into an industrial zone. Please deny this project.

"The rights of posterity are more important than the desires of the present."

- Frederick Law Olmsted, 1822-1903

Father of Architecture- Central Park, Emerald Necklace/Boston, Niagara Reservation/Niagara

Falls
LANDSCAPE

"See the necessity in all that is wild"

- John Muir

Sherry Meier

Post Canyon Dr., Hood River, OR 97031

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Gene + Holly Griswold

Whistling Ridge
Public Comment
#135

■ Silver Gray Rd
Mosier, OR 97040

January 5, 2012

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Regarding the Whistling Ridge Wind Turbine Project

ENERGY FACILITY SITE
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Dear Members of the Washington State Energy Facility Site Evaluation Council,

Please do not approve the Whistling Ridge Wind energy project. The development would degrade scenic value, real estate value, tax income, and wildlife habitat. I feel very strongly about this. My reasons are:

- ❖ Any industrial wind project in any viewscape of the Columbia River Gorge NSA will severely undermine the value of this Scenic Area.
- ❖ The CRGNSA should be kept with a focus on natural horizons
- ❖ If one industrial wind project is allowed, I believe the rest of the ridges in The Gorge will become lined with turbines. This project would be the first in a long line of dominoes falling.
- ❖ I believe more dollars would flow into both States from a Gorge without turbines, than the money that would be made from electricity generation.
- ❖ Tourist dollars would be much less in a CRGNSA lined with turbines
- ❖ The Gorge is a wildlife corridor- leave it alone as a place for creatures of flight to travel unimpeded by turbines that have been proven to pose a danger to flying creatures.
- ❖ Real estate values (and the County income from property taxes) would be less because industrial wind farms would reduce property values
- ❖ All other sources of electricity production should ne exhausted first, before we sacrifice our national parks for our power needs.
- ❖ Humans need natural places to recharge their spirits. The Columbia River Gorge serves the Portland/Vancouver metro areas by providing for citizen health via its natural environment which has been preserved from industrialization.

I believe profit will flow from these Turbines into the hands of a few investors, and, if sited, those in the Gorge will have been sacrificed.

We moved here for the scenic beauty.
We work here in jobs often linked to the scenic beauty.

Please vote NO to this siting request.

Keep the goals of the CRGNSA intact, and foster a culture of conservation before sacrificing this national treasure.

Thank-you

- Holly Griswold
Gene Griswold

Whistling Ridge Energy Project Talking Points

Introduction: For the record, my name is _____ and I live in the town of _____. Thank you for the opportunity to provide comments on the Whistling Ridge Energy Project.

The Washington Energy Facility Siting and Evaluation Council (“EFSEC” or “The Council”) should recommend that the Governor deny the Whistling Ridge Energy Project for the following reasons: (Please highlight three of these points, below. Try and put it in your own words and add you personal experiences.)

- It’s the most controversial and problematic wind project ever proposed in Washington State.
- Would permanently convert hundreds of acres of forest land to industrial development.
- It’s proposed within a designated “Special Emphasis Area” for protecting the Northern Spotted Owl, listed as an endangered species in Washington.
- Immediately adjacent to the Columbia River Gorge National Scenic Area.
- At least 25 turbines would be highly visible from designated key viewing areas.
- Located within three miles of:
 - Lewis and Clark National Historic Trail,
 - Oregon Pioneer National Historic Trail,
 - Historic Columbia River Highway (designated as a National Historic District)
 - the Ice Age Floods National Geological Trail
 - Highway 14 state scenic byway
- Located adjacent to the Gifford Pinchot National Forest, the project would harm recreation resources on national forest lands.

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ENERGY FACILITY SITE
EVALUATION COUNCIL

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JAN 05 2011

ENERGY FACILITY SITE
EVALUATION COUNCIL

January 5, 2011

My name is Bill Ward. I am from White Salmon, Washington.

I am in full support of the Whistling Ridge Energy Project and strongly favor its implementation. Wind energy is an obvious course to pursue in this area due to the abundant, sustainable energy source. Since the project lies outside the National Scenic Area in a location logically suited for this kind of development it should be allowed to proceed.

I have had the pleasure of business relationships with SDS Lumber Company in the past and regard this company as a very successful operation. They will install the project in a manner that will meet the environmental concerns while certainly benefitting the local economics and the energy needs of the future.

W.B. Ward

P.O. Box

White Salmon, WA 98672

Whistling Ridge
Public Comment
#138

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ENERGY FACILITY SITE
EVALUATION COUNCIL

January 5, 2011

To: Energy Facility Site Evaluation Council

As taken from the Final Draft of the Management Plan, July 1991 Page V-24, A description of the visibility of a structure, where that structure does not noticeably contrast with the surrounding landscape. Structures are not to be visually dominant in the relationship to their surroundings.

There is established current policy about breaking the skyline. The proposed windmills will be visual by design. Although the land is outside the scenic area, the structures will have an effect visually.

This project should be denied because it will harm the natural and scenic resources of the gorge. The Columbia Gorge Future Forum submitted in their vision to work to ensure that our communities protect and enhance their identities and quality of life through good governance, sound planning and sustainable development. This proposal will not meet that goal.



Larry Keister
Gorge Resident
[REDACTED] SE Zitzelberger Road
Washougal WA. 98671

(503)703-[REDACTED] Cell
(360)835-[REDACTED] Home

Two things I want to talk about. First is something I believe has been overlooked which goes to the Land Use Consistency issues. Specifically, that the WR project is illegal under Title 22 of the Skamania County Code of Ordinances.

The second and more important thing has to do with broad based policy considerations and the precedent this Counsel would be setting by approving the project.

The Title 22 analysis is a simple exercise in statutory construction. Time will not allow me to walk you thru it chapter and verse, so I have prepared a written memo which does this and would like to distribute it to the counsel at this time.

Suffice it to say that when one applies Title 22 to the Cook Underwood KVA (or any other KVA in Skamania County), Title 22 protects the "Viewshed" of Cook Underwood Road, and requires that any development which can be seen from Cook Underwood Road be "Visually Subordinate". Because the proposed Whistling Ridge Energy Project cannot meet the test of visual subordination the project is illegal. There is nothing in the Ordinance that limits the standard of Visual Subordination to developments within the NSA. In fact, the ordinance is replete with provisions that make it clear that KVAs are protected from visual impacts arising both within and without the NSA.

THE PROPOSED WHISTLING RIDGE ENERGY PROJECT IS ILLEGAL UNDER TITLE 22, BECAUSE IT CANNOT PASS THE TEST OF VISUAL SUBORDINATION.

I would like to close by talking to you about broad policy considerations and the precedent you would be setting by approving this project.

We, as a society, have set aside certain, very limited, areas to be preserved for their scenic beauty. Our State and National Parks, Wilderness Areas, and Scenic areas, to name a few. If this project is approved, it will establish a precedent to the effect that there is no place in Washington that is off limits to development of 430 foot tall turbines except within the specific boundaries of our Parks, Wilderness and Scenic Areas. If you approve this project you will not be able to deny a turbine project located a few feet over the boundaries of Mt Rainer National Park or Olympic National Park or North Cascades National Park or a few feet over the boundaries of the numerous Washington State Parks or Mt St Helens or any of the other places that we, as a society, have set aside to preserve their scenic and wilderness attributes.

This is not a situation where WR is the last or only available wind project in the state of Washington. There are 1000s of acres available in eastern Wa.

EFSEC Public Meeting Comments 1/5/11

with equal or better wind recourse, zero scenic impacts and far fewer wildlife impacts.

What you must consider and determine is what is more important, in the long term, for our society. Is it the preservation of the scenic beauty of our State and National Parks, Wilderness and Scenic Areas for ourselves, our children and grandchildren or is it the desire of a private for profit enterprise such as SDS lumber to make a buck, off a project that they admit produces very little energy, at the expense of irreplaceable scenic assets. --- About 30M just in tax credits---

Also keep in mind that you would be setting a precedent for degrading the scenic assets of the State of Washington to provide power that in all likelihood will be sold to California.

What legacy do you, as a counsel, want to leave? Its it the legacy President Roosevelt, John Muier and other great people that established our National Parks, Wilderness and other protected areas or is it the legacy of a Counsel that opened the door to the destruction of the scenic beauty of these areas for the sole reason of allowing a private landowner to make a profit.

Wirt t. Maxey



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Whistling Ridge Public Comment Meeting

JAN 05 2011

Public Hearing and Comment Opportunity

ENERGY FACILITY SITE
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Name: Betty Daubenspeck

Address: PO Box [redacted] Carson, WA 98610

(Please include your Zip!)

Email Address: [redacted]@comcast.net

Add me to the Mailing list

Please write any comments you have with respect to the

Leave this sheet in the Comment Box today, or mail it to:
EFSEC, PO Box 43172, Olympia, WA 98504-3172.

Comment letters must be postmarked by Saturday, January 15, 2011.

I support Whistling Ridge because its visual impacts will be negligible. The gorge hosts dams, interstate highway, railroads, powerlines & other visual "impacts"! I look forward to when I can look up onto Saddleback Mountain & to see the evidence of our growing economy. I like the way turbines look. I have actually stopped along I84 to take pictures of turbines because I thought they were so beautiful!

I support Whistling Ridge because it will create jobs & bring in needed tax revenues.
Wildlife population will not be affected

Use the back of this form if you need more room for your comments.

For more information, please contact:

Stephen Posner, Siting Specialist, PO Box 43172, Olympia, WA 98504-3172,
call (360) 664-1903, or e-mail efsec@utc.wa.gov.



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Whistling Ridge Public Comment Meeting

JAN 05 2011

Public Hearing and Comment Opportunity

ENERGY FACILITY SITE
EVALUATION COUNCIL

Name: Jared Langdon

Address: [Redacted] Clark St, The Dalles, OR 97058
(Please include your Zip!)

Email Address: [Redacted]@gmail.com

Add me to the Mailing list

Please write any comments you have with respect to the

Leave this sheet in the Comment Box today, or mail it to:

EFSEC, PO Box 43172, Olympia, WA 98504-3172.

Comment letters must be postmarked by Saturday, January 15, 2011.

As an student in the Renewable Energy Technology program at C.G.C.C. and potential employee in the wind sector, I strongly support the Whistling Ridge project. I used to be a resident in this area, and was disappointed in the lack of economic growth and sustenance. I've seen many small businesses cave in due to lack of support. Large projects like this bring in valuable revenue that would circulate in the area. Please support this opportunity to inject some stimulus into our local economy!

Use the back of this form if you need more room for your comments.

For more information, please contact:
Stephen Posner, Siting Specialist, PO Box 43172, Olympia, WA 98504-3172,
call (360) 664-1903, or e-mail efsec@utc.wa.gov.



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Whistling Ridge Public Comment Meeting
Public Hearing and Comment Opportunity

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JAN 05 2011

ENERGY FACILITY SITE
EVALUATION COUNCIL

Name: Mary Alice Fowler

Address: P.O. Box [redacted] Hood River OR 97031
(Please include your Zip!)

Email Address: _____

Add me to the Mailing list

Please write any comments you have with respect to the

Leave this sheet in the Comment Box today, or mail it to:
EFSEC, PO Box 43172, Olympia, WA 98504-3172.

Comment letters must be postmarked by Saturday, January 15, 2011.

Although I have an OR. mailing address I am
a resident of White Salmon - 833 Field St. White Salmon WA
I don't by any means, feel that the long term
consequences are worth the value of the power
generated, by this project. It is by far more
costly to the environment, the long term cost to
the community than the financial benefit
to the private sector or power generation.
Most info. on consequences have been thorough
or realistic AND the damage done to
the environment + visual appearance is
Dangerous.

Use the back of this form if you need more room for your comments.

For more information, please contact:

Stephen Posner, Siting Specialist, PO Box 43172, Olympia, WA 98504-3172,
call (360) 664-1903, or e-mail efsec@utc.wa.gov.

JAN 05 2011

January 5, 2011

Adjudication, Verbal Public Testimony

Teresa Robbins, [REDACTED] Malfait Tracts Road, Washougal WA 98671

ENERGY FACILITY SITE
EVALUATION COUNCIL

Pointed out WindWorks flyer with talking points in favor of Whistling Ridge. Indicated that if I were a community member and received just this information I would think it was a great idea, especially given the flyer's statement (and Mr. Baccus's statement) that the EIS stated there **no significant negative impacts** to the environment, wildlife, or scenic values. I have found the pattern in the EIS to essentially under-estimate harm, and over estimate benefit.

I struggled with what I might say this afternoon. If, indeed, you have read the substantial testimony and documentation we previously submitted, you know that we have invested enormous energy and time in an attempt to provide the most current and accurate research for the council's consideration. We still stand by our testimony. We've followed closely the public comments, expert testimony and EFSEC decisions to this point during the past two years.

I want to acknowledge that your ears and rears may be as uncomfortable as mine given the past three days efforts to sort out the veracity of this application. This has been a tedious, sometimes a painful process. However, I feel it important to keep the heart of the matter in sight.

Credible evidence has been provided through expert witnesses and research that definitively calls into question the accuracy of the applicant's assessment of the proposed project's impact.

This project, if sited, will permanently and negatively alter views from the NSA. It matters little whether it's 38 turbines or 50 turbines. Even T. Boone Pickens (remember the patriotic advertising campaign for wind energy) refuses to place any turbines on his 68,000 acres ranch, stating they were "ugly".

Further, this project will inflict deleterious noise on local residents and will kill bats, birds and raptors in excess of the applicant's estimates.

These unacceptable environmental costs are **not** balanced with clear and convincing evidence of benefit. Sadly, a "proprietary" or "confidential" cloak prevents access to anything of substance that could verify (or potentially debunk) applicant claims.

I, too, found it interesting that Mr. Spadero strongly refused to commit to selling energy within Washington. Likely it will go to California or the highest bidder. So, I guess this project would permanently scar Washington and National Scenic Area views for no assist to Washington energy needs.

If this project is as good as the applicant purports it to be, it should be able to stand on its own merit. Instead, the applicant and county officials expended considerable effort to

shut down, muzzle, disallow and remove from the record the testimonies of USFS and NPS experts.

An inflexible project, it won't budge in area or MWs... it appears to me that the applicant's last-minute "offer" of mitigating to 38 larger turbines (which likely will do little to nothing in reducing and may actually exacerbate the negative impacts) could possibly be more of an attempt to usurp EFSEC's flexibility in proposing more appropriate mitigation measures (for example, removing the A-array, or backing turbines away from spotted owl habitat, or my preference, outright denial of the project).

I want to believe...

That EFSEC is not just an automatic approval route, but rather a discerning council

A council whose members operate with the greater interest of the public at heart.

A council that insists the best science will be used in making determinations.

A council that ensures the true impact of the project will be brought to light.

I want to believe, that after a fair assessment of this project, you will have the wisdom and courage to outright deny it.

(Reference attached previous testimony, June 16, 2010, Chart on page 9... drawn from Wind Turbines, Health, Ridgelines, Valleys – May 7, 2010, Michael Nissenbaum, M.D., also attached)

Cadna A was the computer projection model used at Mars-Hill... sufficiently under-predicting noise levels that actually were to be experienced and resulting in significant health issues. There are others. Cadna A was the computer projection model used in predicting the noise impacts for WRE... Let's not make the same mistake.

KEITH BROWN, Ph.D.

Look, I'm not an expert on wind turbines, but I've taught program evaluation, advanced statistics and measurement techniques at Indiana and Boise State Universities. I was the assistant director of one of the top research and development centers in my field. My job was to find the truth. During the last two years I've spent hundreds and hundreds of hours researching probable impact of wind turbine noise.

The primary purpose of the noise portion of this draft EIS **should be to predict as accurately as possible and to fully describe potential adverse impacts of the probable and worst case noise scenarios** that would be inflicted upon the people who live, work, recreate and sleep in the Cook-Underwood, Mill A and surrounding communities.

This EFSEC/BPA draft EIS, in our opinion, **fails to do this**. Instead:

- 1) it **hides** behind outdated noise regulations never intended for industrial wind turbine complexes,
- 2) it **distorts** the comparison of the EPA to Washington noise guidelines,
- 3) it **ignores** guidelines specifically designed to reduce adverse wind turbine noise impacts,
- 4) it **collects inadequate data** on current noise levels at homes closest to the proposed industrial wind turbines and finally,
- 5) it **uses a computer model too simple to accurately predict** noise levels at affected home locations in complex mountainous terrain and varied weather conditions.

1) What do we mean by "outdated" regulations? The Washington Noise Regulations were written in 1975 (that's **35 years ago**). This is well before the current large-scale industrial wind turbines were even developed!

This draft EIS **ignores the substantial work that has been done since 1996 in developing regulations and guidelines specific to appropriate and ecological siting of industrial wind turbines.** Simply using the outdated Washington Noise regulations will result in this community being subjected to significantly higher noise levels than to which Oregon communities, just across the river, are currently subjected.

(Typical 26 decibel "Background")		
NIGHTTIME MAX		
OREGON	EPA	DRAFT EIS
36	45	50
(Increases allowed over "Background")		
10	10 serious, warrants close attention	24

Just across the river, an industrial wind turbine complex is permitted to create noise levels only up to 10 decibels over existing ambient background noise (typically 26 decibels). So, total ambient background noise plus the wind energy facility operating at **maximum** capacity **is not to exceed a total of 36 decibels.**

How can BPA, which operates in Oregon as well, in good conscience, apply a more destructive standard to Washington? This draft EIS will allow the Whistling Ridge wind complex to increase total noise levels up to and exceeding 60 decibels during the day and 50 decibels during the night. **That's a difference of an additional 14 decibels during the night over the Oregon standard...** when people are attempting to sleep.

Even according to the inadequate sound measurements done for this draft EIS, measured nighttime ambient background noise **would be allowed to rise by 24 decibels!**

You might think 'That's not a lot'. The EPA Region X guidelines stated that an increase of **10-plus decibels** over existing background noise **will result in significant negative community reaction** and would be considered **serious, warranting close attention**. Further, the New York State Energy Research and Development Authority states "...A 10 dB increase is subjectively heard as an approximate doubling in loudness and almost always causes an adverse community response."

24 decibels? Really... That's okay?

2) 1974 EPA guidelines (for general noise, not wind turbine noise) specify a 10 decibel penalty for nighttime hours, which would effectively **limit noise levels to 45 decibels** during the night. In our opinion, this draft EIS skews even this distinction by averaging allowable daytime and nighttime levels, thereby boosting the suggested nighttime limit to **49 decibels**, then portraying it to be "generally consistent" with the 50 decibel outdated Washington standard. What should be compared is the EPA nighttime limit of 45 to the Washington nighttime 50, **which is not generally consistent** (p.3-118, draft EIS). Further, it makes no mention of the EPA guidelines just cited above regarding the impact of decibel increases of 10 or more over background noise.

3) It is astounding that this draft EIS makes no mention of the plethora of guidelines designed specifically to reduce the impact of industrial wind turbine complexes. You wouldn't have had to go very far to get this information.

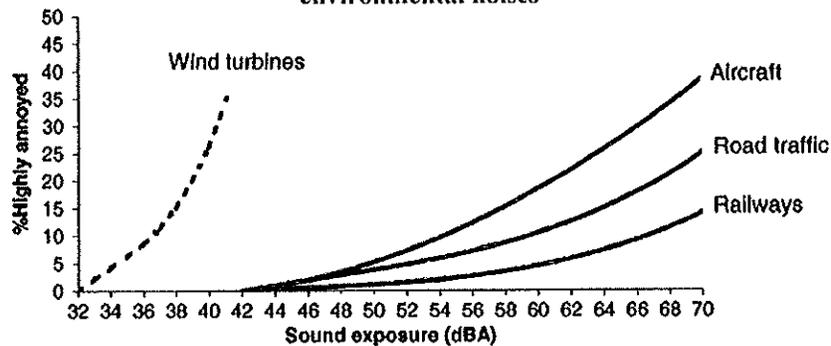
We've already mentioned the Oregon standards (*copy attached*). Similar guidelines exist in country after country around the world, including Australia (*copy attached*), Denmark, France, Germany, Holland, even the World Health Organization. We actually provided you in May of 2009, the extremely useful, recent research **and relevant** Kamperman and James "How to" Guide to Siting Wind Turbines to Prevent Health Risks from Sound. (*copy attached*)

What do all these guidelines have in common? They are based on research of what would be effective in limiting the impact of wind turbine complex noise on nearby residents. **They limit maximum noise levels to between 35 and 40 decibels.** Why do they do this? Based upon decades of extensive experience with wind turbines, they have determined the type and level of noise produced by industrial wind turbine complexes impacts people differently than other industrial noises.

The following chart taken from the **Public Health Impacts of Wind Turbines** prepared by the Minnesota Department of Health Environmental Health Division in response to a request from the Minnesota Department of Commerce Office of Energy Security (equivalent to Washington State EFSEC) demonstrates that the modulating sound wave noise wind turbines produce, results in significantly more annoyance than noises of traffic, railways, and aircraft.

Verbal Testimony of Keith Brown, Ph.D. and Teresa Robbins on the EFSEC/BPA draft EIS for Whistling Ridge Energy Project Noise Impact Section – June 16 2010

Figure 6: Annoyance associated with exposure to different environmental noises



Reprinted with permission from Pedersen, E. and K.P. Waye (2004). Perception and annoyance due to wind turbine noise—a dose-response relationship. The Journal of the Acoustical Society of America 116: 3460. Copyright 2004, Acoustical Society of America.

What specifically does this show? **35+%** of people in rural areas **experience wind turbine noise at about 40 decibels as "highly annoying"**. Conversely, at 40 decibels of aircraft, traffic or railway noise, **0%** of people report "high annoyance". It would take 70 decibels of aircraft noise, and far in excess of 70 decibels for road traffic and railway noise to create the same level of annoyance that wind turbines create at 40 decibels.

Noise standards used for aircraft, railway, and traffic noise **are inadequate** when applied to wind turbine noise impact. **Wind turbines are clearly in a different class of sound impact and require a different standard!**

4) We see no additional measurements other than the short-term and limited measurements originally provided by the consultant hired by SDS (three ²⁰~~10~~-minute readings at a site approximately a ½ mile beyond the home site closest to proposed wind turbine placement and three ¹⁰~~10~~-minute readings from a site nearly 2 miles beyond the 3rd closest home site ... and one 24-hour measurement from the site a ½ mile beyond the closest home site... all taken in January 2009). **Reported measurements were not even taken at the closest property lines or residences.** TRKB

Readings of such short duration prevented measurement of actual ambient noise levels at the home sites when the proposed wind turbines site was experiencing wind at the 6 and 9 meters per second level recommended for accurate projections (*see attached Wind Farms Environmental Noise Guidelines produced by Environmental Protection Authority – South Australia*). For your convenience, 6 and 9 are the cut-in speed and rated power speed, respectively.

By the way, it is critical to take measurements at the right time – summer... and the right place – affected residences. The greatest potential adverse impact is during the summer when people are sleeping with windows open during an inversion when the ambient background noise is very low at the homesite and the wind turbines are operating at maximum speed. Measuring far away from the homes in winter utterly misrepresents what these residents will experience.

Further, the consultant reported that the SDS meteorological data was **potentially compromised due to ice-y conditions**, indicating we don't even know what the actual wind levels were at the wind turbine site during the limited readings provided!

5)

a. The home site closest to the proposed wind turbines is in an area where the wind turbine noise may reflect off of the amphitheater-like bowl terrain, thus the sound will not attenuate as it would in flatter terrain and will be louder. We see no evidence that this was built-in to the computer model. Research in complex mountainous terrain by Prospathopoulos, J. M. and Voutsinas, S. G. (*Application of a ray theory model to the prediction of noise emissions from isolated wind turbines and wind parks... in Wind Energy, Volume 10 Issue 2, Pages 103 – 119, published online: 6 Dec 2006, John Wiley & Sons,*

Ltd.) **proves** that the simple computer model employed in this draft EIS prediction is inadequate. **“In cases of complex terrain... simple projection models are no longer valid.”**

b. The computer projection model utilized is based upon wind speeds measured at 10 meters height, which extensive research shows **will underestimate the wind speeds at the hub by a factor of as much as 2.6!** This results in **underestimating the wind turbine noise by as much as 15 decibels** during inversions when wind shears develop due to layering of air and the separation of wind currents. (*The sound of high winds: the effect of atmospheric stability on wind turbine sound and microphone noise, van den Berg, G. P. 2006, Rijksuniversiteit Groningen*)

While the draft EIS notes this phenomenon, it is once again, not built into the computer projection model used. This is important because, it is during these inversions (mostly at night) that people experience even greater sleep disturbance and what is described by van den Berg 2006 as “thumping”, “pile driving”, “a train coming and never arriving”... and that the most annoyance is reported.

c. The computer projection model appears to use each wind turbine as a “point source”, with no information provided to suggest that the computer simulation treats each array as a “line” source.

There is ample scientifically proven evidence both from: NASA studies (*Prediction of the Far Field Noise from Wind Energy Farms, Shepherd, K. P. and Hubbard, H.H 1986, NASA-CR-177956*)

“At intermediate distances the array acts like a line source for which the theoretical decay rate is 3 dB per doubling of distance or 10 dB per decade. Only at the extreme distances, greater than one row length or 900 m, does the decay rate approach the single source value of 6 dB per doubling of distance or 20 dB per decade”(page 4);

and van den Berg's 2006 thesis, which you even cited in your EIS, that demonstrates wind turbines arrayed in a line, as they are projected to be at the Whistling Ridge site, may operate as a "line source". This results in sound attenuation at 3 decibels per doubling of distance vs. the 6 decibels projected from a "point source". (We recommend you actually read the whole thesis, as we did.)

The same thing happens with cars traveling in a line and it is why USDOT (May 2006 – *Transit Noise and Vibration Impact Assessment*) requires that the **3 decibel attenuation** be used in all assessment and designed mitigation of potentially heavy traffic impact.

We've thoroughly examined this draft EIS on noise impact and find it to be totally inadequate. It needs to be redone.

TERESA ROBBINS

SO...WHAT DOES ALL THIS MEAN TO THE PEOPLE OF THIS COMMUNITY?

We offer this recent study (with appropriate "control" group protocols) conducted by Medical Doctor Michael A. Nissenbaum (whole slew of qualifications) to provide some important insight and "sound" the alarm (see attached: *Wind Turbines, Health, Ridgelines, and Valleys, 2010*).

"If industrial wind turbines installed in close proximity to human habitation result in sleep disturbance and stress, then it follows ... that wind turbines will, over the long term, result in... serious health effects (cardiovascular disease, chronic feelings of depression, anger, helplessness) and reduced quality of life."

He compared a group of “exposed” individuals, meaning living within 3500 feet of a ridgeline arrangement of 28 1.5 MW wind turbines... (Note: the proposed Whistling Ridge will have more and larger turbines)

And a group of similar age and occupation “not exposed” individuals, meaning living approximately 3 miles away from the industrial complex...

Here’s what he found:

“EXPOSED”

NOT “EXPOSED”

New/worsened chronic sleep deprivation

82%

4%

New chronic headaches

41%

4%

Stress

59%

0%

Persistent anger

77%

0%

New/worsened depression

33+%

0%

Perceived reduced quality of life

95%

0%

New prescriptions offered

26 (15 accepted)

New/increased prescriptions

4

Type of prescriptions

Anti-hypertensives	anti-hypertensives
Anti-depressants	anti-arthritics
Anti-migraines	

"There is absolutely no doubt that people living within 3500 feet of a ridgeline arrangement of turbines 1.5 MW or larger ... in a rural environment will suffer negative effects."

Ridgeline industrial wind turbine complex "noise travels farther and hits homes and people at greater amplitude than it would from a lower elevation. Even though this is not rocket science, it was conclusively proven in a NASA funded study in 1990."

"The WHO says that 30dbA is ideal, and noise levels of above 40 dbA have definite health consequences. At Mars Hill, where affected homes are present at 3500 feet, sound levels have been measured at over 52.5 dbA.... The people who live within 3500 feet ...are truly suffering."

And you are proposing to allow up to 60 decibels here? We fear this will lead to similar suffering as residents of Mars Hill.

The cutting edge equipment we have previously proposed you use for more accurate measurement, and according to Nissenbaum,

..."revealed drastic short duration excesses over allowed sound levels, levels that set homes vibrating and rendering them unlivable, but also levels of lower frequency transient noise at the audible level, that demonstrates not only failure of preconstruction sound modeling as currently practiced, but also the

inadequacy of the measuring tools in the toolkit of the everyday practicing acoustician-consultant who generates reports for industry and local government.”

In addition to this study, we are providing you with a copy of the 26-page white paper Public Health Impacts of Wind Turbines prepared by the Minnesota Department of Health Environmental Health Division in response to a request from the Minnesota Department of Commerce Office of Energy Security (equivalent to Washington State EFSEC).

It is a recent review, **performed by two unbiased Ph.D. Toxicologists**, of all the relevant published studies. While we strongly insist you read the entire study, due to limited time to testify, we offer one quote from the white paper conclusions.

“The most common complaint in various studies of wind turbine effects on people is annoyance or an impact on quality of life. Sleeplessness and headaches are the most common health complaints and are highly correlated (but not perfectly correlated) with annoyance complaints. Complaints are more likely when turbines are visible or when shadow flicker occurs. Most available evidence suggests that reported health effects are related to audible low frequency noise. Complaints appear to rise with increasing outside noise levels above 35 dbA.”

And if that is not enough, here are quotes from one of the experts you cited in the draft EIS (**van den Berg, 2006**). He has conducted one of the most comprehensive studies of what is causing the increased noise levels experienced above model predictions.

“Recently Pedersen... found that annoyance was relatively high at calculated maximum sound immission levels below 40 dB(A) where one would not expect strong annoyance.”

"As wind turbines become taller, the discrepancy between real and expected levels grows and as more tall wind turbines are constructed complaints may become more widespread. ... It may be that earlier discrepancies between real and projected sound immission were not sufficient to evoke strong community reactions, and **that only recently turbines have become so tall that the discrepancy now is intolerable.**"(our emphasis)

"... in quiet nights the wind farm can be heard at distances up to several kilometers when the turbines rotate at high speed. In these nights, certainly at distances from 500 to a 1000 meters from the wind farm, one can hear a low-pitched thumping sound with a repetition rate of once a second... not unlike distant pile driving. A resident living a distance of 2.3 kilometers from the wind farm describes the sound as 'an endless train'."

And finally, this is your cited expert we quote

"... proponents must accept that wind turbine noise is not (always) benign, that the noise may affect people, and that people who are complaining are not always just a nuisance."

Read his excellent 210-page dissertation. We have. Hence, we continue to be upset and very concerned.

Respectfully Submitted,

Keith Brown, Ph.D.
Teresa Robbins
211 Malfait Tracts Road
Washougal, WA 98671

Wind Turbines, Health, Ridgelines, and Valleys

Montpelier, VT, May 7 2010

It is a medical fact that sleep disturbance and perceived stress result in ill effects, including and especially cardiovascular disease, but also chronic feelings of depression, anger, helplessness, and, in the aggregate, the banishment of happiness and reduced quality of life.

Cardiovascular disease, as we all now, leads to reduced life expectancy. Try and get reasonably priced life insurance if you are hypertensive or have suffered a heart attack.

If industrial wind turbines installed in close proximity to human habitation result in sleep disturbance and stress, then it follows as surely as day follows night that wind turbines will, over the long term, result in these serious health effects and reduced quality of life.

The question is, then, do they?

In my investigation of Mars Hill, Maine, 22 out of about 30 adults ('exposed') who live within 3500 feet of a ridgeline arrangement of 28 1.5 MW wind turbines were evaluated to date, and compared with 27 people of otherwise similar age and occupation living about 3 miles away (Not Exposed).

Here is what was found:

82% (18/22) of exposed subjects reported new or worsened chronic sleep deprivation, versus 4% (1 person) in the non-exposed group. 41% of exposed people reported new chronic headaches vs 4% in the control group. 59% (13/22) of the exposed reported 'stress' versus none in the control group, and 77% (17/22) persistent anger versus none in the people living 3 miles away. More than a third of the study subjects had new or worsened depression, with none in the control group. 95% (21/22) of the exposed subjects perceived reduced quality of life, versus 0% in the control group. Underlining these findings, there were 26 new prescription medications offered to the exposed subjects, of which 15 were accepted, compared to 4 new or increased prescriptions in the control group. The prescriptions ranged

from anti-hypertensives and antidepressants to anti migraine medications among the exposed. The new medications for the non exposed group were anti-hypertensives and anti-arthritis.

The Mars Hill study will soon be completed and is being prepared for publication. Preliminary findings have been presented to the Chief Medical Officer for Ontario, and have been presented to Health Canada, by invitation. Earlier partial results were presented to the Maine Medical Association, which passed a Resolution calling for caution, further study, and appropriate modification of siting regulations, at its annual meeting in 2009.

There is absolutely no doubt that people living within 3500 feet of a ridgeline arrangement of turbines 1.5 MW or larger turbines in a rural environment will suffer negative effects.

The study was undertaken as a pilot project to evaluate for a cluster of symptoms after numerous media reports, in order to present data to the Maine Medical Association, after the Maine CDC failed to more fully investigate.

While the study is not perfect, it does suggest a real problem that warrants not only further more detailed investigation, but the tenderest caution, in the meantime, when decisions on how to site industrial wind turbines are made.

What is it about northeast USA ridgelines that contribute to these ill effects, and how can they be avoided?

Consider, the Northeast is prone to icing conditions. Icing will increase the sound coming off of turbines by up to 6 dBA. As the icing occurs symmetrically on all blades, imbalance detectors do not kick on, and the blades keep turning, contrary to wind industry claims.

Sound is amplified coming off of ridgelines into valleys. This is because the background noise in rural valleys is low to begin with, increasing the sensitivity to changes, particularly the beating, pulsatile nature of wind turbine noise, and sound sources at elevation do not undergo the same attenuation that occurs from groundcover when noise sources are at ground level. The noise travels farther and hits homes and people at greater

amplitude that it would from a lower elevation. Even though this is not rocket science, it was conclusively proven in a NASA funded study in 1990.

Snow pack and ice contribute to increased noise transmission. Vermont valleys have both, I believe.

Preconstruction sound modeling fails to take the tendency of the homes that people live in to respond and vibrate perceptibly to sound at frequencies that the occupants of the dwellings cannot necessarily hear. They hear, and feel, the walls and windows rattle, and the floors vibrate, in a pulsing manner at a frequency or the turbine rpm.

When pre construction modeling fails to take the pulsatile nature, propensity for icing, and ridgeline elevation into account, as well as a linear as opposed to point source of noise, problems can be expected. What distance is safe? It depends on the terrain, the climate, the size of the project and the turbines themselves. Accurate preconstruction modeling with safe targets in mind is critical. The WHO says that 30dbA is ideal, and noise levels of above 40dbA have definite health consequences. At Mars Hill, where affected homes are present at 3500 feet, sound levels have been measured at over 52.5dbA. The fiasco there has been acknowledged by the local wind energy company, and by a former Maine governor.

Vermont would do well to learn from the affected people in Mars Hill.

I have seen the preliminary plans for the planned Deerfield Wind Facility, and have particular concerns regarding the dwellings to the north and northeast of the northernmost extension of the turbine layout. These homes are well within a mile, generally downwind, and downhill from what I am told may well be 2 MW turbines (or larger?), in a snowy and icy part of the Northeast.

The parallels to Mars Hill are striking.

We know that preconstruction sound modeling failed at Mars Hill. No matter what the preconstruction modeling at Deerfield shows, the real world experiment at Mars Hill suggests that there will be problems for homes at the setbacks that seem to be planned for Deerfield on the attached image.

The people who live within 3500 feet at Mars Hill are truly suffering. Learn from Mars Hill. It is not a matter of not having wind turbines. It is a matter of putting them where they will not affect people's health.

Newer technology to accurately measure sound at a quantum level improvement in temporal, frequency and amplitude resolution over commonly used acoustician's equipment now exists, though it is costly and not readily available. But it will be widespread, soon, well within the tenure of the individuals responsible for making siting decisions today.

Avail yourselves of these findings and familiarize yourselves with the new technologies. You will not only be future proofing your current decisions, you will also be helping people who would otherwise end up too close to industrial wind turbines escape the fate of the exposed residents of Mars Hill, and many other sites in North America (Mars Hill, Maine, merely represents the first small 'controlled' study).

I have seen the results of this cutting edge equipment, and how it has revealed drastic short duration excesses over allowed sound levels, levels that set homes vibrating and rendering them unlivable, but also levels of lower frequency transient noise at the audible level, that demonstrates not only failure of preconstruction sound modeling as currently practiced, but also the inadequacy of the measuring tools in the toolkit of the everyday practicing acoustician-consultant who generates reports for industry and local government.

Michael A. Nissenbaum, MD

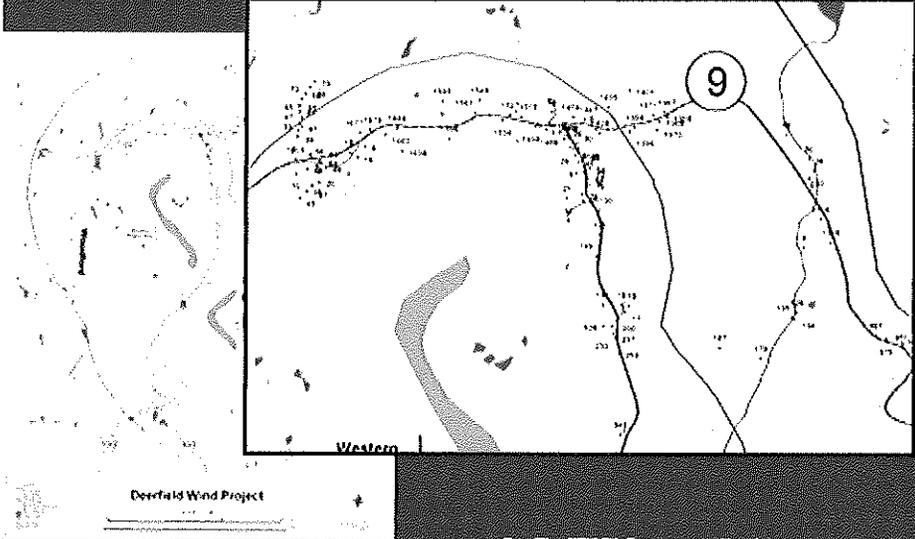
University of Toronto (MD), McGill University (Specialty Diagnostic Imaging),

University of California (Fellowship)

Harvard University Medical School (junior faculty, Associate Director of MRI, BIH)

Currently, Radiologist, NMMC, Ft. Kent, Maine

Deerfield Wind Project, Vermont



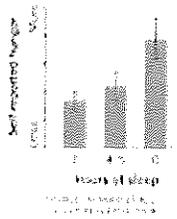
2 MW turbines?

Effects of sleep deprivation

Losing sleep, even for one night, can trigger a flood of changes throughout the body. Scientists don't fully understand how the sleep-starved body goes awry, but many studies find clear relationships between sleep and the health and function of body systems.

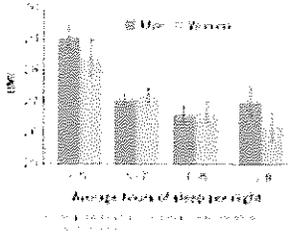
Thymus
 The organ that produces and stores white blood cells

Stomach
 The organ that digests food



Pancreas
 The organ that produces and stores insulin

Fat layer
 The layer of fat that surrounds the body



Muscle
 The tissue that makes up most of the body's mass

Brain

People who get less sleep are more likely to have a higher risk of depression, anxiety, and other mental health problems.

Attention and sleep

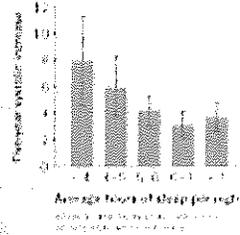


People's performance on an attention test declines with sleep loss (left), even though they report they're not sleeping (right).

Heart

The organ that pumps blood throughout the body

Blood pressure and sleep



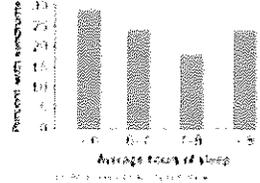
Joints

The points where two or more bones meet. Sleep deprivation can lead to joint pain, stiffness, and inflammation.

Metabolism

The chemical processes that convert food into energy. Sleep deprivation can lead to a higher risk of the metabolic syndrome, which includes high blood pressure and cholesterol and reduced insulin sensitivity, sometimes leading to diabetes and heart disease.

The metabolic syndrome



Michelle, Kayce (UTC)

From: john stege [REDACTED]@wavecable.com]
Sent: Wednesday, January 05, 2011 6:45 PM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am opposed to the Whistling Ridge Energy project and am writing to ask you to stop the project going forward.

This project is by the Columbia River Gorge National Scenic Area and would be highly visible.

Whistling Ridge would harm our national heritage.

Both the National Park Service and the United States Forest Service have concluded that the project will harm important national resources.

Protect our heritage; recommend to Governor Gregoire that the Whistling Ridge Project be denied.

Sincerely,

John Stege

john stege
[REDACTED] lodgepole
port orchard, WA 98366

Michelle, Kayce (UTC)

From: [REDACTED]@embarqmail.com
Sent: Wednesday, January 05, 2011 7:29 PM
To: EFSEC (UTC)
Subject: I support Whistling Ridge

Hello Energy Facility Site Evaluation Council,

Whistling Ridge will give Skamania County the economic boost it so drastically needs. With only 3 percent of the county suited for development, it is absolutely crucial to support new growth where it can occur. Tourism is no substitute for what the timber industry has done and, with all the protections, can do. Wind development is a great way to diversify and strengthen the local economy. This wind project will bring in new jobs, millions of dollars in tax revenues, and increased local spending during construction and ongoing operations. Local landowners, businesses and citizens will all benefit from what Whistling Ridge will bring. Please approve this project.

Sincerely,
Terry Weber
P.O.Box [REDACTED] Ryan Allen Rd
Stevenson, Wa 98648

Michelle, Kayce (UTC)

From: STEVE GIBSON [REDACTED]@gmail.com]
Sent: Wednesday, January 05, 2011 7:45 PM
To: EFSEC (UTC)
Subject: Whistling Ridge- Let's do it !!

>>>> RIGHT TIME - RIGHT PLACE ! >>>>>

Clean Energy !

Let's Do It !

FOG (Friends of the Gorge) is out to CLOUD UP the real facts-

Whistling Ridge is OUTSIDE " The National Scenic Area " thus they really have no firm ground to stand on ! A line is already drawn in the sand/hillside !

FOG & most of it's members are from areas outside the Mid-Columbia- Please don't allow the hoards of NIMBY (most live in a large city over an hour away) influence EFAEC.

Skamania County is the local jurisdiction that can make wise decisions

Stand strong in your support for clean energy & economic development in the Mid-Columbia.

Native to the Gorge-

Steve Gibson
White Salmon WA

Michelle, Kayce (UTC)

From: David Mildrexler [redacted@netscape.net]
Sent: Wednesday, January 05, 2011 8:36 PM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am very concerned about the scale, combined with rapid pace of wind energy development in Oregon, and particular in the Columbia River Gorge. I am opposed to the Whistling Ridge Energy project and am writing to recommend that you deny the project going forward to Governor Gregoire. For my whole life I have traveled through the Columbia River Gorge and it is difficult to see the invasive looking turbines projecting above what was before, the perfect union of sky and gracefully sculpted hilltops. The peace and stillness in the view is gone, and there is no escape at night as bright red lights invade the senses in an even more offensive manner. A friend of mine stated that looking up to the undeveloped hilltops of the Gorge was the only place left where one could see the same thing that the Indians had seen long before Lewis and Clark. But it is more than just views. Wildlife corridors and critical habitat are being lost rapidly due to these windfarms. Eagles, bats, and songbirds are being killed. Mule deer and elk are being displaced. These wildlife populations bring resiliency to our world and biodiversity conservation is just as urgent and critical as dealing with climate change. In fact biological diversity maintains ecosystem resiliency to climate change. This mutually exclusive approach where wildlife and plant communities are sacrificed for energy development is bound to fail.

Whistling Ridge, if completed, would harm important aspects of our national heritage, including natural, historic and cultural resources of the Columbia River Gorge National Scenic Area, the Lewis and Clark National Historic Trail, the Historic Columbia River Highway, the Oregon Pioneer National Historic Trail, the Ice Age Floods National Geologic Trail and the SR14 scenic byway.

I am not alone in my opposition; both the National Park Service and the United States Forest Service have concluded that the project will harm important national resources.

With numerous dams, major highways on either side of the river, barge shipping, and a railroad, hasn't the Columbia River Gorge given enough for our energy and related transportation demands? Please recommend to Governor Gregoire that the Whistling Ridge Project be denied.

Sincerely,

David Mildrexler
PO Box [redacted]
Joseph, OR 97846

Michelle, Kayce (UTC)

From: Sue Hartford [REDACTED]@embarqmail.com]
Sent: Wednesday, January 05, 2011 8:40 PM
To: EFSEC (UTC)
Subject: Comment re. Whistling Ridge Proposed Wind Turbines

I would like to voice my opposition to the proposed placement of 50 wind turbines in the Whistling Ridge area behind Underwood Mountain. I feel that wind energy can be a positive energy source. However, placing wind turbines near the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Historic Columbia River Highway, and the Ice Age Floods National Geological Trail seems extremely inappropriate, with negative visual, cultural and wildlife impacts.

As a 30 year resident of Hood River, I have lived in awe of the natural beauty of this area. I am very hopeful that you maintain the serenity. Thank you for the opportunity to submit this public comment.

Susan R Hartford
[REDACTED] Thomsen Rd.
Hood River, OR 97031

Michelle, Kayce (UTC)

From: Cathy Bachelor ([REDACTED]@comcast.net]
Sent: Wednesday, January 05, 2011 8:41 PM
To: EFSEC (UTC)
Subject: No to Whistling Ridge

To the Energy Facility Site Evaluation Council,

I oppose the Whistling Ridge Energy Project. I am writing to recommend that you deny the project in your recommendations to Governor Gregoire.

The project would contain 50 highly visible turbines along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area. Up to 25 of the 50 turbines would be highly visible from key viewing areas of the scenic area and each turbine would be more than 420 feet tall and equipped with blinking lights that would be visible for miles in all directions. These key viewing areas include State Route 14, which is also designated as a state scenic byway.

Whistling Ridge would produce less than 20 megawatts of energy a year, while Washington and Oregon have over 40,000 megawatts of wind energy development potential that can easily meet growing demands without sacrificing our national heritage. Whistling Ridge is simply not worth the cost.

The adverse impacts of the project on one of the most scenic regions in the United States far outweigh the projects minimal benefits. I urge you to recommend denial of the Whistling Ridge Energy Project.

Sincerely,

Cathy Bachelor
[REDACTED] SW Washington Dr Portland
Portland, OR 97223

Michelle, Kayce (UTC)

From: Camille Hall [redacted]@peak.org
Sent: Wednesday, January 05, 2011 9:16 PM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I urge you to recommend that Governor Gregoire deny the Whistling Ridge Energy Project as planned. Its contribution to the power needs of Oregon and Washington are far outweighed by its environmental and economic impacts.

The project creates only 20 megawatts of power per year, while placing 25 highly-visible turbines along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington. This will jeopardize a valuable scenic view which currently draws tourists from around the world.

The Whistling Ridge Project is also proposed within a designated "Special Emphasis Area" protecting the Northern Spotted Owl, listed as an endangered species in Washington. Siting of wind turbines for this project must be planned to maximize the safety of these birds.

The United States Forest Service and the National Park Service have recommended substantial modifications to the project. Other groups who have raised concerns or oppose the projects include: Friends of the Columbia Gorge, Save Our Scenic Area, Skamania County Agri-Tourism Association, Seattle Audubon Society, Gifford Pinchot Task Force, Columbia Gorge Audubon Society and Friends of the Historic Columbia River Highway.

I urge you to recommend to Governor Gregoire that the Whistling Ridge Project be denied.

Sincerely,

Camille Hall
[redacted] NW Mountain View Drive
Corvallis, OR 97330

Michelle, Kayce (UTC)

From: Kelley Beamer [REDACTED]@hotmail.com
Sent: Wednesday, January 05, 2011 10:27 PM
To: EFSEC (UTC)
Subject: Deny Whistling Ridge Energy Project!

EFSEC:

You have before you a precedent-setting decision regarding the proposed wind turbine development on Whistling Ridge. Please make the choice that will protect one of the nation's most stunning view-sheds and an area rich in natural resources. The proposed wind development threatens spotted owl habitat and a key migratory bird corridor. It does not belong on the edge of the Columbia River Gorge National Scenic Area.

Make the right choice for the State of Washington and for all of the public that cares about protecting the Columbia River Gorge- Please recommend that Governor Gregoire DENY this project.

Thank you for considering my comments on this very important issue. I will be tracking your recommendation.

Sincerely, Kelley Beamer

Kelley Beamer
[REDACTED] N gantenbein
Portland, OR 97217

Michelle, Kayce (UTC)

From: Neal Keefer [REDACTED]@msn.com
Sent: Wednesday, January 05, 2011 10:44 PM
To: EFSEC (UTC)
Subject: Deny Whistling Ridge

Dear Washington Energy Facility Site Evaluation Council,

I am writing in opposition to the Whistling Ridge Energy Project. I urge the Council to recommend denial of the project to Governor Gregoire.

There are too many costs to the surrounding areas to make the project worth the risks. The Whistling Ridge Energy Project would be adjacent to the Gifford Pinchot National Forest - an increasingly popular recreational resource for the community. The views of Mt. Hood would be blocked from public trails to the north and would cause significant adverse impacts to scenic views in both Washington and Oregon.

The project would be visible from Highway 14, which is a designated state scenic byway. Highway 14 is designated as a scenic byway because of the natural scenic beauty of the Columbia Gorge area. The project's immense turbines would protrude above the ridgeline converting this landscape into an industrial zone and harming scenic resources.

The construction of the project itself would cause traffic impacts in the Underwood Community. The operation of this massive industrial energy complex would harm the emerging agricultural tourism economy that is located at the base of the project site.

For these reasons, I urge you to recommend to Governor Gregoire that the Whistling Ridge Project should be denied.

Sincerely,

Neal Keefer
[REDACTED] N.E. Couch St.
Portland, OR 97232

Michelle, Kayce (UTC)

From: [REDACTED]@yahoo.com
Sent: Wednesday, January 05, 2011 10:57 PM
To: EFSEC (UTC)
Subject: I support Whistling Ridge

Hello Energy Facility Site Evaluation Council,

Climate change is the number one issue facing our environment today. With the help of wind farms like Whistling Ridge, we can fight back. Wind is pollution-free, local and sustainable. It doesn't get much better than that!

With Condit Dam coming down and the Boardman coal plant scheduled for closing, it is crucial to support new renewable development. Wind energy is a clean way to help fill our ever-increasing need for power, contribute to state renewable energy mandates, and reduce our dependence on fossil fuels. We need more alternative energy sources, and Whistling Ridge is a great place to start.

Sincerely,
Nick Scott
[REDACTED] Sunset Dr.
Lyle, WA 98635

Michelle, Kayce (UTC)

From: RENEE VANDEGRIEND [REDACTED]@EMBARQMAIL.COM]
Sent: Wednesday, January 05, 2011 10:57 PM
To: EFSEC (UTC)
Subject: No to Whistling Ridge

To the Energy Facility Site Evaluation Council,

I oppose the Whistling Ridge Energy Project. I am writing to recommend that you deny the project in your recommendations to Governor Gregoire.

The project would contain 50 highly visible turbines along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area. Up to 25 of the 50 turbines would be highly visible from key viewing areas of the scenic area and each turbine would be more than 420 feet tall and equipped with blinking lights that would be visible for miles in all directions. These key viewing areas include State Route 14, which is also designated as a state scenic byway.

Whistling Ridge would produce less than 20 megawatts of energy a year, while Washington and Oregon have over 40,000 megawatts of wind energy development potential that can easily meet growing demands without sacrificing our national heritage. Whistling Ridge is simply not worth the cost.

The adverse impacts of the project on one of the most scenic regions in the United States far outweigh the projects minimal benefits. I urge you to recommend denial of the Whistling Ridge Energy Project.

Sincerely,

Renee van de Griend

RENEE VANDEGRIEND
[REDACTED] POST CANYON DR
HOOD RIVER, OR 97031

Michelle, Kayce (UTC)

From: Mary Hayden [REDACTED]@comcast.net
Sent: Thursday, January 06, 2011 6:33 AM
To: EFSEC (UTC)
Subject: NO Whistling Ridge Project

Dear Energy Facility Site Evaluation Council,

I am writing to urge the Council to recommend that Governor Gregoire deny the Whistling Ridge Energy Project for the following reasons:

- It's the most controversial and problematic wind energy development ever proposed in Washington State.
- It would permanently convert hundreds of acres of forested land to industrial development.
- The project is proposed within a state-designated "Spotted Owl Special Emphasis Area" where suitable habitat for the recovery of this endangered species must be protected and enhanced. The project would adversely affect many species of birds, including Northern Spotted Owls, listed as endangered in Washington.

Wind energy projects should be an important part of our energy future in Washington, but poorly planned projects like Whistling Ridge should not be allowed to sacrifice our national heritage like the Columbia River Gorge and the Lewis and Clark Trail and state scenic byways like State Route 14.

For these reasons, I urge you to recommend to Governor Gregoire that the Whistling Ridge Project be denied.

Sincerely,

Mary Hayden
[REDACTED] S. Redland Rd.
Oregon City, OR 97045

Michelle, Kayce (UTC)

From: Jill Petersen [REDACTED@aol.com]
Sent: Thursday, January 06, 2011 6:44 AM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am opposed to the Whistling Ridge Energy project and am writing to recommend that you deny the project going forward to Governor Gregoire.

This project is immediately adjacent to the Columbia River Gorge National Scenic Area and at least 25 turbines would be highly visible from designated key viewing areas. Up to 25 of the 415-foot-tall turbines would be visible from State Route, 14 a state scenic byway in addition to being a designated key viewing area. The turbines would be visible for two miles of the highway, with westbound travelers looking directly at strings of turbines atop prominent ridges.

Whistling Ridge, if completed, would harm important aspects of our national heritage, including natural, historic and cultural resources of the Columbia River Gorge National Scenic Area, the Lewis and Clark National Historic Trail, the Historic Columbia River Highway, the Oregon Pioneer National Historic Trail, the Ice Age Floods National Geologic Trail and the SR14 scenic byway.

I am not alone in my opposition; both the National Park Service and the United States Forest Service have concluded that the project will harm important national resources.

Protect our heritage; recommend to Governor Gregoire that the Whistling Ridge Project be denied.

Sincerely,

Jill Petersen
[REDACTED] Belmont Dr
Hood River, CO 97031

Michelle, Kayce (UTC)

From: Melissa Hayden [redacted]@dslnorthwest.net]
Sent: Thursday, January 06, 2011 7:55 AM
To: EFSEC (UTC)
Subject: Deny Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing to urge the Council to recommend that Governor Gregoire deny the Whistling Ridge Energy Project for the following reasons:

- It's the most controversial and problematic wind energy development ever proposed in Washington State.
- It would permanently convert hundreds of acres of forested land to industrial development.
- The project is proposed within a state-designated "Spotted Owl Special Emphasis Area" where suitable habitat for the recovery of this endangered species must be protected and enhanced. The project would adversely affect many species of birds, including Northern Spotted Owls, listed as endangered in Washington.

Wind energy projects should be an important part of our energy future in Washington, but poorly planned projects like Whistling Ridge should not be allowed to sacrifice our national heritage like the Columbia River Gorge and the Lewis and Clark Trail and state scenic byways like State Route 14.

For these reasons, I urge you to recommend to Governor Gregoire that the Whistling Ridge Project be denied.

Sincerely,

Melissa Hayden
[redacted] Saginaw St. S
Salem, OR 97302

Michelle, Kayce (UTC)

From: lesdew [REDACTED]@embarqmail.com]
Sent: Thursday, January 06, 2011 8:21 AM
To: EFSEC (UTC)
Subject: Whistling Ridge Energy Projects

Can't make your meetings on this project, so would like to voice my support for it. It is a sound project that will not only benefit the area but will add clean energy to the nw region grid.

We can't have it both ways, take out the dam on the White Salmon in hopes of adding a type of salmon that is useless(nobody will eat them)-reducing a good clean energy source and then saying don't put wind power in my backyard.

Opponents to this project don't own the land, don't pay taxes on this land, and shouldn't be allowed to stop this project. Some of these same opponents went onto SDS land cutting fences, making trails, etc. which resulted in them having to restrict access which hurt everyone who before had been able to access the land as long as they were respectful of it.

Anyway, SDS has my vote and should be allowed to go forward with this project.

Leslie Dewey
[REDACTED] hwy 141
White Salmon, WA

Michelle, Kayce (UTC)

From: Cynthia clague [REDACTED]@gmail.com]
Sent: Thursday, January 06, 2011 10:25 AM
To: EFSEC (UTC)
Subject: Deny Whistling Ridge

Dear Washington Energy Facility Site Evaluation Council,

I am writing in opposition to the Whistling Ridge Energy Project. I urge the Council to recommend denial of the project to Governor Gregoire. As someone who has driven through the gorge for many years, the change in the scenic value of that drive in eastern Washington and Oregon is astounding. But the western portion is one of the great scenic areas of the world. To mar that skyline with wind turbines is not only bad environmentalism, it's bad business. People come from all over the world to see the Columbia River Gorge, and rightly so. Don't take the chance to ruin a good thing.

There are too many costs to the surrounding areas to make the project worth the risks. The Whistling Ridge Energy Project would be adjacent to the Gifford Pinchot National Forest - an increasingly popular recreational resource for the community. The views of Mt. Hood would be blocked from public trails to the north and would cause significant adverse impacts to scenic views in both Washington and Oregon.

The project would be visible from Highway 14, which is a designated state scenic byway. Highway 14 is designated as a scenic byway because of the natural scenic beauty of the Columbia Gorge area. The project's immense turbines would protrude above the ridgeline converting this landscape into an industrial zone and harming scenic resources.

The construction of the project itself would cause traffic impacts in the Underwood Community. The operation of this massive industrial energy complex would harm the emerging agricultural tourism economy that is located at the base of the project site.

For these reasons, I urge you to recommend to Governor Gregoire that the Whistling Ridge Project should be denied.

Sincerely,

Cynthia clague
[REDACTED] Blanton Rd
eugene, OR 97405

Michelle, Kayce (UTC)

From: [REDACTED]@embarqmail.com
Sent: Thursday, January 06, 2011 11:17 AM
To: EFSEC (UTC)
Subject: I support Whistling Ridge

Hello Energy Facility Site Evaluation Council,

I write this in very strong support of the Whistling Ridge wind project. The N.S.A. charter as I read it is charged with protecting the Scenic, Cultural and ECONOMICS of the area. To date I've seen very few, if any benefits to the local economy outside of tourism. The Washington State Government has mandated a certain percentage of our energy demand is met with "Green" or "Renewable" energy resources. This environmentally sound project is a perfect opportunity to boost the local economy, by providing jobs, helping our tax base, and supporting our schools

The argument of damage to the view shed has been brought up by the supposed "friends of the gorge" and many other individuals. To that I say look at the map, this site is outside the NSA boundary... At what point do we stop allowing these obstructionist groups the ability to effect decisions outside the NSA?? With wind farms visible from the east end of the Gorge, who is to say that a family owned commercial wheat farm is any less stunning to look at than a family owned tree farm? The Timber Industry is a huge part of the Culture of the gorge and has been drastically affected by the "not in my back yard" mind set of these special interest groups.

From our home in Underwood we have a choice of what to look at every day. Do we simply notice the obnoxiously colored kites and sails on the river or the neon signs at Wal-Mart or the aviation beacon at the Hood River Airport? No, we choose to look at the positives of this area and hope that this panel will choose the positives of the Whistling Ridge Project and issue it's permit

Sincerely,
Jon Ohlson
pob. [REDACTED] School House Rd
Underwood, Wa. 98651

RECEIVED

JAN 06 2011

ENERGY FACILITY SITE
EVALUATION COUNCIL

Ladies and Gentlemen:

I am Carol Taylor from Cascade Locks, Oregon. Thank you for this opportunity to express my views on the proposed wind farm. I do not plan on being politically correct.

I don't understand why greed is being couched in "green energy". Not only will this wind farm cause visual impacts, but scar the land forever. The energy would be sent to California. I say build them in California. I have seen Altamonte Pass and the many turbines elsewhere in California. They were built in scrub areas & if you add a few more to their totals it won't matter. The turbines will be manufactured overseas therefore the jobs are overseas.

During construction there will be some jobs, but after completion there will be very few – just for maintenance.

The same company, promoting the wind farm, is promoting a resort project further East in the Gorge. This company is the one that mined outside its boundaries causing a huge slide on Highway 14. This company is the one who purchased land in the Cascade Locks Port to use either as an outlet mall or some other project if the proposed casino is approved. Obviously this company, and their promoters, is not interested in the least in protecting the Gorge. Between this proposal, the proposed casino, the proposed water bottling plant and the newest, that I just heard about, the proposed development in Dallesport the area will be ruined. The Gorge will no longer be a recreational sanctuary for future generations. There seems to be many people promoting all of this development and pretending & spouting that it is for jobs. Don't be fooled. The politicians promoting and assisting in the development and ruination of the Gorge are only interested in what they hope to gain. What has happened to integrity and honestly representing the people

you work for or who elected you? There is just way too much corruption and self interest.

I have planned a family reunion for next summer. I have asked them all to bring their cameras to record the beauty of the Columbia River Gorge because if the greedy developers and politicians have their way it will be the last time they will see this very special area in this condition.

I ask you to think long and hard about this project as once it is built there is no turning back. The landscape and environment will be forever ruined. The threat to the birds and wildlife is very real. The harm to humans is real. Please turn down this monster project and protect the Columbia River Gorge. Don't allow the misnomer of "Green Energy" to replace common sense.

Carol A Taylor
PO Box [REDACTED]
Cascade Locks, OR 97014

from www.saveourscenicarea.org/sosa_actions.htm

Whistling Ridge
Public Comment
#162

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JAN 06 2008

ENERGY FACIL
EVALUATION

April 7, 2008

VIA CERTIFIED MAIL

Mr. Stephen P. Reynolds
Chairman, President & CEO
Puget Sound Energy
10885 NE 4th Street
P.O. Box 97034
Bellevue, WA 98009-9734

Re: Saddleback Mountain Wind Farm Project

Dear Mr. Reynolds:

This letter is in response to your letter dated January 2, 2008, replying to my letter to you of December 10, 2007.

At the outset, I would like to make it clear that neither the undersigned or Save Our Scenic Area, a Washington Non-Profit Corporation (SOSA), an organization with which I am involved, are opposed to wind energy, per se. We are, however, vehemently opposed to siting wind energy projects in areas such as the Saddleback Mountain area, where they would destroy the viewshed of the Columbia River Gorge National Scenic Area.

For your information, enclosed please find a copy of a Complaint for Declaratory and Injunctive Relief filed by SOSA in the Superior Court of the State of Washington for Clark County, against Skamania County. SOSA's attorney, J. Richard Aramburu, a recognized expert in Washington Growth Management Act (GMA) issues, has advised SOSA that Skamania County has failed to comply with certain requirements of the GMA and that compliance by Skamania County with these requirements would preclude wind farms being sited where they are currently proposed to be sited in connection with the Saddleback Project. The Complaint seeks to compel Skamania County's compliance with the GMA.

Mr. Stephen P. Reynolds
April 7, 2008
Page 2

Does PSE deny that the turbines proposed for the Saddleback project would completely dominate the National Scenic Area viewshed throughout Skamania and Hood River counties and to points beyond? Does PSE deny that the strobe lights on the proposed turbines would completely dominate the night sky in the National Scenic Area throughout Skamania and Hood River counties and to points beyond?

Your letter of January 2, 2008 makes reference to Initiative 937, which has been codified as Chapter 19.285 of the Revised Code of Washington. Reproduced below is the text of RCW 19.285.020:

Declaration of Policy

Increasing energy conservation and the use of appropriately sited renewable energy facilities builds on the strong foundation of low-cost renewable hydroelectric generation in Washington state and will promote energy independence in the state and the Pacific Northwest region. Making the most of our plentiful local resources will stabilize electricity prices for Washington residents, provide economic benefits for Washington counties and farmers, create high-quality jobs in Washington, provide opportunities for training apprentice workers in the renewable energy field, protect clean air and water, and position Washington state as a national leader in clean energy technologies. (emphasis added)

Is it PSE's position that 420 foot tall turbines topped with strobe lights, which would violate the intention of the Columbia River Gorge National Scenic Area Act, and which would dominate the viewshed of the National Scenic Area, day and night, are "appropriately sited" within the meaning of RCW 19.285.020?

Enclosed please find a Wind Power Resources map of Clark, Skamania, and Klickitat County developed by True Wind Solutions. This map clearly shows that the wind power resources on the western end of the county, which are a considerable distance north of the National Scenic Area where it is unlikely that the turbines would be visible from the Scenic Area, are far superior to the wind power resources in the Saddleback Mountain area. As well, we understand that there are BPA Power lines in the area.

Why is PSE interested in developing a wind project which would destroy the viewshed of the National Scenic Area, when there are better wind resources in the western part of Skamania County which would have little or no impact on the National Scenic Area viewshed?

Your letter of January 2, 2008 indicates that "the area is one of the few places in Washington that offer ideal winds for cost effective utilities scaled power generation." Please explain why, in light of the data indicated on the enclosed Wind Power Resources Map, the

Mr. Stephen P. Reynolds
April 7, 2008
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Saddleback area is better for wind power generation than the area in the western part of Skamania County. Also, your letter indicates that wind energy "would give the county an economic boost and expand tax revenues for local schools and other critical services." Please explain and quantify precisely how much tax revenue the project would provide.

Your letter also states that "PSE is now attempting to obtain from SDS Lumber Company development rights for a wind project in the Saddleback Mountain area." The undersigned personally met with Jason Spadaro of SDS Lumber on November 29, 2007. During this meeting, Mr. Spadaro made it a point to state that SDS had already entered into a joint venture agreement with PSE to develop the Saddleback Mountain project. This is inconsistent with the statement in your letter above quoted. Please explain and clarify the business arrangement between SDS and PSE.

As you may be aware, KGW Television in Portland broadcasted a news report on the Saddleback Mountain project on March 11, 2008. If you are interested, you may view the shorter internet version of the broadcast at their website; <http://www.kgw.com/video/video-index.html?nvid=226189>.

Many of the questions which I have posed to you in this letter were asked of me by the KGW reporter. Obviously, I did not have answers and declined to answer on behalf of PSE. I feel certain that our media contacts at KGW and elsewhere would be most interested in PSE's answers to these questions.

The vast majority of residents who are aware that this project has been proposed for the Saddleback Mountain area are opposed to the project. This includes not only residents of the Underwood area, but residents of the Mill A area, White Salmon and the Hood River areas. Is it PSE's intention to proceed with a project where the community residents are opposed?

Below is a summary of the explanations requested and questions posed in this letter:

1. Does PSE deny that the turbines proposed for the Saddleback project would completely dominate the National Scenic Area viewshed throughout Skamania and Hood River counties and to points beyond?
2. Does PSE deny that the strobe lights on the proposed turbines would completely dominate the National Scenic Area night sky from throughout Skamania and Hood River counties and to points beyond?
3. Is it PSE's position that turbines, which would dominate the viewshed of the National Scenic Area, day and night, are "appropriately sited" within the meaning of RCW 19.285.020?

Mr. Stephen P. Reynolds
April 7, 2008
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4. Why is PSE interested in developing a wind project which would destroy the viewshed of the National Scenic Area, when there are better wind resources in the western part of Skamania County, which would have little or no impact on the National Scenic Area viewshed?
5. Please explain and quantify why the Saddleback area is better for wind power generation than the area in the western part of Skamania County.
6. Please explain and quantify precisely how much tax revenue the project would provide.
7. Please explain and clarify the business arrangement between SDS and PSE.
8. Is it PSE's intention to proceed with a project where the community residents are opposed?

We would appreciate receiving specific responses to each question.

Finally, with all due respect, we are compelled to advise PSE that, should the project move forward, the undersigned, together with numerous other affected residents, will use every means at our disposal, including but not limited to the State and Federal Courts, and the court of public opinion, to stop this project. As well, we have been in contact with Friends of the Gorge, and have been assured that, should formal application for the project be made, that Friends of the Gorge will use every means at its disposal to stop the project. We respectfully suggest that PSE's business interests would be better served by developing a project in the western portion of Skamania County, where the project would enjoy a far greater wind power resource, would have little or no impact on the viewshed of the Columbia River Gorge National Scenic Area, would not result in PSE becoming known as the company attempting to pollute the Columbia River Gorge National Scenic Area viewshed, and would not be opposed by the numerous individuals and organized groups dedicated to preserving the Columbia River Gorge National Scenic Area.

Yours very truly,
Wirt T. Maxey

WTM:ah

Enclosures

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1-6-2011

Whistling Ridge Talking Points:

ENERGY FACILITY SITE
EVALUATION COUNCIL

Whistling Ridge
Public Comment
#163

**Dear Council Members...thank you for the opportunity to speak today.
My name is Dave McKenzie support the Whistling Ridge
Energy Project for the following reasons:**

**Skamania County's ability to grow its economy and develop
renewable energy projects is limited. The Whistling Ridge Wind
Energy project is proposed for a site that is privately owned and
consistent with land use requirements. It is located entirely outside
the Columbia River Gorge National Scenic Area and therefore no
development restrictions are imposed on this site by that legislation.**

**But speaking of the Scenic Area Act that was passed in 1986, the
federal government has purchased more than 20,000 acres of private
land in Skamania County alone removing this land from the County's
tax role and to be set aside for scenic protection. Also when the
Scenic Act was passed we still had timber harvesting in the Gifford
Pinchot National Forest. That has all but dried up in subsequent
years.**

**Let me share briefly what percentage of Skamania County's land base
is available for development:**

**Total acreage in Skamania County is a little over one Million acres
(1,070,080)**

80% or roughly 855,000 acres is the Gifford Pinchot National Forest

**8% or roughly 85,204 acres is in the Columbia River Gorge National
Scenic Area where development is severely restricted**

6% or roughly 59,876 acres is in state forest land

**4% or roughly 39,369 acres is in private forest commercial resource
land**

In doing the math this leaves only 3% or roughly 28,109 acres of the county's total land base available for residential, business, or commercial, and industrial development. Obviously this figure includes land that has already been developed so we really don't even have the full 3%.

Historically Skamania County has relied on revenues from timber harvests to provide necessary services to its residents. The Secure Rural Schools and Counties funding is declining annually and will end soon. Skamania County must take advantage of each opportunity it has to grow its tax base and move toward fiscal sustainability.

Skamania County's unemployment rate is currently 12.1%. This project would provide 143 construction jobs; 9 permanent jobs and 5 indirect jobs for a total of 14 new family wage jobs. In a County with a small workforce this is a huge impact; Now let me put that number 14 in prospective for you. Skamania County has a population of approximately 10,800. The City of Vancouver has a population of approximately 165,000. In order to have the same impact that this project would have in Skamania County, it would generate 214 jobs in Vancouver. That's substantial, that's the impact we're talking about here. 14 family wage jobs doesn't sound like much but relative to our population it is. From this anticipated project, \$650,000 annually would be generated to support state and local taxing districts; and \$900,000 in employee generated local spending. There would also be substantial ongoing indirect job and revenue creation. Those figures are significant for a small county like Skamania.

I believe Whistling Ridge Energy is the right project, at the right time and the right place. The project creates green economic development. It is environmentally prudent. As I stated before, it is located entirely outside the National Scenic Area boundaries, yet provides needed fiscal resources to support community and tourism services in Skamania County.

I urge the Energy Facility Site Evaluation Council to support the siting of Whistling Ridge Energy Project in its current form and proposed location.

Thank you.

A handwritten signature in black ink, consisting of several overlapping loops and lines, positioned below the text "Thank you."

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JAN 06 2011

ENERGY FACILITY SITE
EVALUATION COUNCIL

Whistling Ridge Comments, 01-06-2011

Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Wa 98504-3172
Whistling Ridge Energy Project Appl. # 2009-01

Thank you for the opportunity to share some of my concerns:

Nothing personal. For you all.

--First, I am concerned about EFSEC ability to be fully impartial/objective. EFSEC is in charge of conducting the project analysis and will make a recommendation to Washington's Governor. In my mind, this is analogous to the BIA in charge of doing an EIS for proposed tribal casinos, giving their recommendation to the DOI, such as the horrendous 600,000+ sq.ft. off-reservation casino proposal for Cascade Locks which would also destroy the majesty of the CRG. I feel that both of these agencies are enablers for the parties they represent. I find it hard to believe that these agencies can be fully transparent and impartial. How many wind turbine proposals have EFSEC rejected? The interests of the majority should outweigh the financial benefits for the few.

--First Wind Turbine project in a wooded area in the Northwest therefore impacts to wildlife are unknown.

--The wind turbines for this project are larger than the diameter of a Boeing 747 Jumbo Jet—these placed on top of a 2000ft. ridgeline would cause major negative visual impacts.

--This proposal is within a designated "Special Emphasis Area" for protection of the Northern Spotted Owl, an endangered species in Washington State.

--These wind turbines can have deleterious effects to numerous bird and bat populations. Stated in the EIS by the applicant under Unavoidable Adverse Impacts, "...the project would result in some ongoing mortality to birds and bats..." and that "...this level is not expected to be high enough to impact species viability..." The proponent is only speculating on this. There is no hard science to back this claim. The Columbia River Gorge is part of the Pacific flyway for numerous migratory birds. There is no model to predict the mortality is such a heavily used flyway.

--These wind turbines will be 420ft. tall. The space needle is 605ft. tall. The Columbia River Gorge is no place for any manmade structure on top of the beautiful ridgelines. The EIS states that, "...the level of visual impact would not be higher than low to moderate at any of the viewpoints examined." Over half of the proposed wind turbines would be highly visible from several designated key viewing areas, which is more than a "moderate" negative impact. People come to the CRG to enjoy many recreational opportunities. If they want to see the Space Needle, they can drive to Seattle.

--Numerous individuals as evidenced by the public testimony you have heard at the previous meetings, as well as several major groups have concerns and/or opposed to this project including: Friends of the Columbia Gorge, Save Our Scenic Area, Skamania County Agri-Tourism Assoc., Seattle Audubon Society, Gifford Pinchot Task Force, Columbia Gorge Audubon Society, Friends of the Historic Columbia River Highway

--Multiple agencies such as the USFS and the NPS have recommended substantial modifications to the project as it is currently proposed.

--This project would harm sacred cultural resources, as confirmed by two separate professional archeologist's reports by the Yakama Nation.

--The wind turbines are made by a foreign company, with the majority of energy forecast to go to California. The tax credits the proponent will receive will be coming from my tax dollars to fund a supposed "green energy" project that will purchase foreign made materials for energy slated to mostly go to California. There is no guarantee that the construction jobs will go to locals and the miniscule 8-9 on-site positions stated in the EIS may also go to outsiders. Sure there has been a mandate put in place for each state to reach a certain amount of renewable energy but just because the wind blows doesn't mean you erect several dozen Space Needles in that area, especially an area so unique in all of America as the Columbia River Gorge. Do we have to ruin all of our scenic places in the name of manmade progress?

Thank You,



Paul Smith

Skamania County resident

██████████ Mabee Mines Road

Washougal, WA 98671