Whistling Ridge
Public Comment
#291

Talburt, Tammy (UTC)

From: Charles Harold <[redacted]@gmail.com>
Sent: Thursday, January 13, 2011 6:49 PM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I am opposed the poorly planned Whistling Ridge Energy Project. Please recommend that Governor Gregoire deny the project.

The project itself is the most controversial and problematic wind project ever proposed in Washington State and be highly visible along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington.

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.

I am not alone in my opposition; multiple agencies –including 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,

Charles Harold
[redacted] N Jantzen Ave [redacted]
Portland, OR 97217

Whistling Ridge
Public Comment
#292

Talburt, Tammy (UTC)

From: Meredith Long <[redacted]@gmail.com>
Sent: Thursday, January 13, 2011 6:55 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,

Meredith Long
[redacted] Camino de las Huertas
Placitas, NM 87043

Whistling Ridge
Public Comment
#293

Talburt, Tammy (UTC)

From: fred baisden <[redacted]@comcast.net>
Sent: Thursday, January 13, 2011 6:58 PM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I am opposed the poorly planned Whistling Ridge Energy Project. Please recommend that Governor Gregoire deny the project.

The project itself is the most controversial and problematic wind project ever proposed in Washington State and be highly visible along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington.

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.

I am not alone in my opposition; multiple agencies –including 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,

Fred Baisden

fred baisden
[redacted] SW 1st Ave
Portland, OR 97239

Whistling Ridge
Public Comment
#294

Talburt, Tammy (UTC)

From: F Fletcher <[redacted]@gmail.com>
Sent: Thursday, January 13, 2011 7:23 PM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing today to recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

Sincerely,

F Fletcher
POB [redacted]
Wilsonville, OR 97070

Whistling Ridge
Public Comment
#295

Talburt, Tammy (UTC)

From: Eva Kronen <[redacted]@hotmail.com>
Sent: Thursday, January 13, 2011 7:43 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,

Eva Kronen
[redacted]Brentwood
Eugene, OR 97404

Talburt, Tammy (UTC)

From: Richard Gorringe, Ph.D. <[redacted]@hotmail.com>
Sent: Thursday, January 13, 2011 7:45 PM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

Sincerely,

Richard Gorringe, Ph.D.
[redacted] NE Sunderland
Portland, OR 97211

Whistling Ridge
Public Comment
#297

Talburt, Tammy (UTC)

From: Jurgen Hess <[redacted]@gorge.net>
Sent: Thursday, January 13, 2011 7:55 PM
To: EFSEC (UTC)
Subject: Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I spoke to the Council at the hearing on January 5 at the Underwood Community Center. I defined the issues and problems with Mr. Tom Watson's visual simulations. I said that the visual simulations were flawed and need to be redone. I want to reiterate that point. Please do not make a decision as to visual/scenic impact based on Mr. Watson's studies.

Landscape Architects Dean Apostol and the Forest Service's Dianna Ross both are some of the most experienced professionals in scenery management and particularly visual simulations. Besides myself, there are very few people in the Northwest that have the same level of experience in this area. I agree with and support Dean Apostol's and Diana Ross's analysis, reports and testimony and the Forest Service's letters to your Commission.

Thank you for considering these comments.

Sincerely,

Jurgen Hess
[redacted] 24th Street
Hood River, OR 97031

Jurgen Hess
[redacted] 24th Street
Hood River, OR 97031

Copy of CD submitted to the council

Talburt, Tammy (UTC)

From: Robert Sullivan [redacted]@spiritone.com>
Sent: Thursday, January 13, 2011 8:05 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 wind turbines violate the spirit if not the letter of the law concerning the Gorge Scenic Area agreement. There is no reason to build the wind turbines in a place that will be visible from the Gorge. The assault on the Gorge from various attempts to 'develop' constantly amaze and sadden me.

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,

Robert Sullivan
[redacted] N. Willamette Blvd
Portland, OR 97217

Whistling Ridge
Public Comment
#299

Talburt, Tammy (UTC)

From: Paulette and Ron Tatum [redacted]@peoplepc.com>
Sent: Thursday, January 13, 2011 8:14 PM
To: EFSEC (UTC)
Subject: WE Say No to Whistling Ridge

To the Energy Facility Site Evaluation Council,

We strongly oppose the Whistling Ridge Energy Project. We are writing to recommend that you deny the project in your recommendations to Governor Gregoire. We believe that California who would benefit most should be better at energy-saving and also get its own power closer to home and not leach off of the scenic beauty of Oregon and Washington.

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,

Paulette and Ron Tatum
[redacted] SW Blanton
Aloha, OR 97007-1340

Whistling Ridge
Public Comment
#300

Talburt, Tammy (UTC)

From: Patricia L. Arnold <[redacted]@gorge.net>
Sent: Thursday, January 13, 2011 8:23 PM
To: EFSEC (UTC)
Subject: Deny Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

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

I oppose Whistling Ridge for several reasons:
1. The likely devastating effect of this project on avian populations and bats. Klickitat County, where I live, has allowed huge development of wind power at huge environmental cost, and that is in shrub-steppe environment. Allowing this kind of development in forested areas can only be worse.

2. The proximity to inhabited areas. Wind power has by no means been proved to be safe for human (and wild) populations living nearby. This project puts the communities of Underwood, Husum, and BZ Corner at risk. We need to know more about effects on living beings near these projects – light, noise, and vibrations – before we subject whole populations to them.

3. There is plenty of wind power being generated in this area, and we don't need more. This project, like many in our area, will sell power elsewhere, not to local markets. We, as a rural county, are being exploited for the benefit of distant, wealthier communities.

4. Windmills may not be coal, but they are not proven to be "green" power either. We built the whole Columbia River Basin dam system on the widely accepted idea that hydro was "green". I remember. Nothing that makes wholesale disturbances in natural systems, and that includes large wind farms, can be green, and we need to put the brakes on this latest fad before we, or our children and grandchildren, end up regretting what we have done.

5. The WREP would be a visual insult to the Columbia River Gorge.

Thank you for your consideration of these points. Your statutory requirement is to determine whether the energy benefit produced by the project justifies the cost to the public and the environment. I submit that it does not.

Very truly yours,

Patricia L. Arnold

Patricia L. Arnold
[redacted]Sunnyside Road
Trout Lake, WA 98650

Whistling Ridge
Public Comment
#301

Talburt, Tammy (UTC)

From: Diane Morris [redacted]@msn.com>
Sent: Thursday, January 13, 2011 8:28 PM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing today to recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

Sincerely,

Diane Morris
[redacted]W Landing Dr. [redacted]
Portland, OR 97239

Whistling Ridge
Public Comment
#302

Talburt, Tammy (UTC)

From: Paul Woodsong <[redacted]@gmail.com>
Sent: Thursday, January 13, 2011 8:31 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,
Paul & Bev Woodsong

Paul Woodsong
[redacted] SE 53rd. Ave.
Portland, OR 97215-1805

Whistling Ridge
Public Comment
#303

Talburt, Tammy (UTC)

From: mary griffiths [redacted]@msn.com>
Sent: Thursday, January 13, 2011 9:28 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 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. Please do not go forward with this project!

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

Sincerely,
Mary Griffiths

mary griffiths
[redacted]se 17th ave
portland, OR 97214

Whistling Ridge
Public Comment
#304

Talburt, Tammy (UTC)

From: Ali Elmi [redacted]@yahoo.com>
Sent: Thursday, January 13, 2011 9:49 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 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,

Ali Elmi
P.O. Box [redacted]
Beaverton, OR 97075

Talburt, Tammy (UTC)

From: Ron Vaughan [redacted]@frontier.com>
Sent: Thursday, January 13, 2011 10:21 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,
Ronald P. Vaughan

Ron Vaughan
[redacted] SW Sleret Ave.
Gresham, OR 97080

Whistling Ridge
Public Comment
#306

Talburt, Tammy (UTC)

From: Melissa Grewenow [redacted]@msn.com>
Sent: Thursday, January 13, 2011 10:27 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 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,

Melissa Grewenow
[redacted] Hillside Lane
Lake Oswego, OR 97034

Whistling Ridge
Public Comment
#307

Talburt, Tammy (UTC)

From: Thomas Milne <t[redacted]@comcast.net>
Sent: Thursday, January 13, 2011 11:01 PM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I do not support 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,

Thomas Milne
[redacted]May St.
Hood River, OR 97031

Whistling Ridge
Public Comment
#308

Talburt, Tammy (UTC)

From: Laurence Hermsen <[redacted]@comcast.net>
Sent: Thursday, January 13, 2011 11:01 PM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I am opposed the poorly planned Whistling Ridge Energy Project. Please recommend that Governor Gregoire deny the project.

The project itself is the most controversial and problematic wind project ever proposed in Washington State and be highly visible along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington.

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.

I am not alone in my opposition; multiple agencies –including 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,

Laurence Hermsen
[redacted]NE Rosa Parks Way
Portland, OR 97211

Whistling Ridge
Public Comment
#309

Talburt, Tammy (UTC)

From: Edward Craig <[redacted]@gmail.com>
Sent: Friday, January 14, 2011 12:38 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,

Edward Craig
[redacted] West Fifth Ave. [redacted]
Eugene, OR 97402

Talburt, Tammy (UTC)

From: Jackie Cherry <[redacted]@gmail.com>
Sent: Friday, January 14, 2011 6:48 AM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I am opposed the poorly planned Whistling Ridge Energy Project. Please recommend that Governor Gregoire deny the project.

I like wind energy but NOT IN THE NATIONAL SCENIC AREA OF THE COLUMBIA GORGE. There are already TOO MANY turbines visible at the east end. Let's keep all new turbines away from the postcard picture views of our #1 Tourist Destination. Why are you shooting ourselves in the foot??

The project itself is the most controversial and problematic wind project ever proposed in Washington State and be highly visible along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington.

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.

I am not alone in my opposition; multiple agencies –including 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,

Jackie Cherry
[redacted] SW Capitol Hwy.
Portland, OR 97219

Whistling Ridge
Public Comment
#311

Talburt, Tammy (UTC)

From: Steve Alford <[redacted]@gorge.net>
Sent: Friday, January 14, 2011 6:58 AM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing today to recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

Sincerely,

Steve Alford
[redacted]Frankton
Hood River, OR 97031

Whistling Ridge
Public Comment
#312

Talburt, Tammy (UTC)

From: Jan Polychronis <[redacted]@yahoo.com>
Sent: Friday, January 14, 2011 7:07 AM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing today to recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

I am for sustainable energy but cited wisely. This is not the right place. We have hundreds of windmills in the Gorge now. Let's make the best changes. Solar is another possibility. I live in The Dalles with 16" of annual rainfall a year and abundant sunshine. Let's go solar.

Sincerely,

Jan Polychronis
PO Box[redacted]
The Dalles, OR 97058

Whistling Ridge
Public Comment
#313

Talburt, Tammy (UTC)

From: Tom Keys <[redacted]@msn.com>
Sent: Friday, January 14, 2011 7:18 AM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing today to recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

While I am a huge proponent of alternative energy, there are just some special places where projects like this create many more negative effects than positive. Energy is important to all of us, but clean air, clean water, and the habitats for all living things far outweighs the need for this site to be developed.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

Sincerely,

Tom Keys
[redacted] SE 21st Ct
Gresham, OR 97080

Whistling Ridge
Public Comment
#314

Talburt, Tammy (UTC)

From: Susan Charles <[redacted]@gmail.com>
Sent: Friday, January 14, 2011 7:25 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,

Susan Charles
[redacted] Heritage Loop
Hood River, OR 97031

Whistling Ridge
Public Comment
#315

Talburt, Tammy (UTC)

From: Judy Anderson <[redacted]@aol.com>
Sent: Friday, January 14, 2011 8:19 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,

Judy Anderson
[redacted] Cougar Mt. Rd.
Cottage Grove, OR 97424

Talburt, Tammy (UTC)

From: Bill Tomlinson <[redacted]@mesd.k12.or.us>
Sent: Friday, January 14, 2011 8:30 AM
To: EFSEC (UTC)
Subject: Whistling Ridge Energy Project public comment

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:

I am a frequent visitor to the Columbia River Gorge for recreation as well as visiting friends in Hood River and Lyle.

I have hiked many areas in the Scenic Area, and also outside of the Scenic Area that would be negatively impacted by this development.

The wind farms to the east of the gorge are visible from the upper portion of the Klikitat Trail. I hiked that trail last summer, to get out into the natural world for a while. But every time you looked up from the first portion of the trail, the first thing you'd notice was the slow turning of hundreds of these gigantic windmills. The sense of being out in the wild was lost.

I would not want this to happen within the Scenic Area. The scenic area's biggest value is how incredibly beautiful the views are.

Please do not destroy this beautiful, wild place!

Sincerely,

Bill Tomlinson
[redacted] NW Sauvie Island Road
Portland, OR 97231

Whistling Ridge
Public Comment
#317

Talburt, Tammy (UTC)

From: Gary Bushman <[redacted]@yahoo.com>
Sent: Friday, January 14, 2011 9:08 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,
Gary D. Bushman

Gary Bushman
Methodist Road
Hood River, OR 97031

Whistling Ridge
Public Comment
#318

Talburt, Tammy (UTC)

From: Laurel Bushman <[redacted]@yahoo.com>
Sent: Friday, January 14, 2011 9:11 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.

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,
Laurel I Bushman

Laurel Bushman
Methodist Road
Hood River, OR 97031

Talburt, Tammy (UTC)

From: Brian Beinlich <[redacted]@beinlich.org>
Sent: Friday, January 14, 2011 9:23 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,

Brian Beinlich
PO Box [redacted]
North Plains, OR 97133

Talburt, Tammy (UTC)

From: Barbara Robinson <[redacted]@gorge.net>
Sent: Friday, January 14, 2011 9:46 AM
To: EFSEC (UTC)
Subject: Whistling Ridge Wind Farm comments

Dear EFSEC:
I submitted extensive comments on the proposed Whistling Ridge Wind Farm last fall, sending relevant maps and a diagram as well as a letter in a large manilla envelope. I would like to resubmit these comments. I am currently being a snowbird in Needles, CA, and do not have access to everything I submitted, but you do have it, and I would like you to consider what I sent then as resubmitted to you now. Below is the letter that was enclosed in my submission:

Aug. 22, 2010

RE: Application No. 2009-1

Whistling Ridge Energy LLC

Dear EFSEC,

My name is Barbara Robinson. I live in the Columbia Gorge in Rowena, about 7 miles west of The Dalles, in OR. I will not see the proposed wind towers from my house. I strongly favor wind farms in eastern OR and WA, where the population density is low and the ranchers who live near the towers benefit financially. I frequently drive Wasco to Condon and enjoy seeing the towers. But I strongly oppose towers that are highly visible from National Parks and Scenic Areas, and other places valued and visited by many for their natural beauty, because wind towers are visually dominant and change the landscape. The specific thing that stimulated this letter was seeing a photo simulation of what the wind towers would look like from I-84 in a mailing sent to Gorge residents by wind farm advocates. I was quite shocked at how big and conspicuous they were, even in the advocate's literature. I am writing to oppose the Whistling Ridge wind farm, for the following reasons:

1. There are many appropriate places for Wind Farms in eastern WA where wind towers are currently going in, and many can be added. The big picture is that there is no pressing energy reason to put Wind Towers at the edge of the Columbia Gorge National Scenic Area where they are clearly visable in the Scenic Area and have a clear adverse affect on it. WA is not in short supply of good places for wind farms. In fact, the NW is getting close to capacity on how many wind farms the grid can handle. The only reason for putting wind towers in this particular place is to financially benefit a particular company - SDS Lumber owns the location and can make money this way.

2. The Wind Towers will have a clearly definable adverse impact on the CGNSA. In the Management Plan for the Gorge are a list of "Key Viewing Areas" and guidelines for color, height, etc. for anything built that can be seen from a key viewing area. (See below.) The guidelines are there to prevent new structures from having an adverse impact on key viewing areas. The wind towers proposed would be visible from several key viewing areas in the Gorge.and do not meet the quidelines in the management plan, so they will have a clearly defined adverse impact.

3. Approving this siting will set a precedent for decisions in the rest of WA when a wind farm is near a National Park or other scenically beloved area. The towers are not in the CGNSA, but are set very close (I have heard 20 feet from the boundary, but in any case a look at the enclosed map shows that they are very close) to the boundary. Because they are not in the boundary, the CGNSA has no legal authority over the wind farm placement. In OR, however, the Dept. of Energy Facilities Siting Council has written standards (enclosed) for siting. Two of them are that new energy facilities shall not have adverse effects on certain places, the Columbia Gorge being one, and second that new facilities shall not adversely affect scenic values recognized in federal or local land use plans, and the CGNSA Key Viewing Areas would be a perfect example. If the WA EFSEC fails in this case to consider well defined adverse impacts on a federal National Scenic Area, you are setting a precedent. I realize it is easy for WA government to sacrifice the Columbia Gorge because it is not near Seattle, but if you site towers here, what grounds will you use to deny siting near scenic areas like Mt Rainier, Puget Sound, and the Olympics?

4. The Management plan set the afore-mentioned standards to protect the natural beauty of the Gorge from being overwhelmed by human construction. If you allow wind towers on the rim of the Gorge where they will be very visible, that makes a mockery of all these standards that private landowners have to abide by in building their houses in the CGNSA. Why should someone have to paint their house an inconspicuous dark brown if above him can be seen white spinning towers with red lights at night?

5. If you allow these towers on the rim of the Gorge, you are setting a precedent in the Gorge. On what grounds could you deny any others near the Gorge? This will lead to all the rims of the Gorge, at least on the WA side, being lines with towers, since the wind is good everywhere. In turn, that may break down the objections to towers on the OR side.

I would now like to go into more detail on especially point 2 - Clearly defined adverse scenic impacts:

The Columbia Gorge National Scenic Area was created 25 years ago to protect the beauty of the Gorge. No buffer zone was created for its boundaries, but at the time no one envisioned the possibility of huge (greater than 400 ft. tall) wind towers on the tops of all its ridges. Recently wind towers went in just east of the Gorge Scenic Area boundary along Hwy. 97 as it winds up out of the Gorge going to Goldendale. If you doubt that wind towers impact the landscape, drive that road. You may like them or not, but they are now the first thing you notice, not the land. In fact, their movement is so hypnotic that I have trouble watching the road.

The Gorge Management Plan that was created to carry out the National Scenic Area Act lists "key viewing areas" in the Gorge that deserve special protection, and the Management Plan gives clear standards for anything built that can be seen from the key viewing areas. The proposed wind towers will be just outside the boundary of "General Management Area (GMA)" coniferous forest land. I enclose the relevant Management Plan pages (2007 revision) that govern building on that category of land if it is visible from a "key viewing area.". Some of these are:

"Each development shall be visually subordinate to its setting as seen from key viewing areas." (p.1-1-7)

"The silhouette of new buildings shall remain below the skyline of a bluff, cliff, or ridge as seen from dey viewing areas." (p.1-1-8)

"..Colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or in the surrounding landscape." (1-1-9)

"The exterior of buildings on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity.." (1-1-9)

*Exterior lighting shall be directed downward and sited, hooded, and shielded such that it is not highly visible from key viewing areas." (1-1-10)

"Structure height small remain below the forest canopy level. (1-1-17)

These towers will be visible from several "key viewing areas" Two of these key viewing areas are I-84, the freeway on the OR side, and the Cook-Underwood Rd.in WA. I have put those on the enclosed map as dots. Again, the towers will not be within the Scenic Area boundary, so the Scenic Area rules do not apply directly. On the other hand, the Scenic Area guidelines for building (see above) give clear standards for what "adversely affects" the Columbia Gorge. I have heard that the towers closest to the Scenic Area boundary will be only 20 ft. away from it, but let us say it is 200 ft. I have also heard that the towers area taller than 400 ft, but let us say they are 400 ft, including the blade. By the map enclosed, I find that the Cook-Underwood Rd. simulation viewpoint in the URS is about 1 3/8 miles from the closest tower. Let us say that tower is 200 ft out ot the Scenic Area, and 400 ft. tall. A little math (enclosed) shows that this tower is the visual equivalent of a 389 foot tower built just on the boundary, as seen from the Cook Underwood Rd. Looking at the standards for building within the Scenic Area, it is clear that a 389 ft tower built just inside the boundary would violate every building guideline listed - it would be on the ridge against the sky, far above the trees, shiny white, with a red flashing light at night. In addition, it would be moving, and the human eye and brain instinctively focus on movement. (I taught perception in college, and that was one of the principles.) This tower would be about the furthest thing from "visually subordinate" that could be imagined. It would dominate the landscape. These building guidelines are in the Management Plan to prevent structures from having an adverse impact on the Gorge, and can therefore be taken as criterion for when something would have an adverse impact. In Oregon the Facilities Siting Council has written guidelines for siting energy facilities.(Division 22: General Standards for siting Non-Nuclear Energy Facilities) Two of these are:

(345-022-0040) Protected Areas

1)..the Council shall not issue a site certificate for a proposed facility located in the areas listed below. To issue a site certificate for a proposed facility located outside the areas listed below, the Council must find that, taking into account mitigation, the design, construction and operation of the facility are not likely to result in significant adverse impact to the areas listed below. (The Columbia Gorge National Scenic Area is a listed area.)

(345-022-0080) Scenic and Aesthetic Values

1) ..the Council must find that the design, construction, operation and retirement of the facility, taking into account mitigation, are not likely to result in significant adverse impact to scenic and aesthetic values identified as significant or important in applicable federal land management plans or in local land use plans in the analysis area described in the project order.

A proposed wind farm on the OR side of the Gorge on Sevenmile Hill also would have had towers next to the Scenic Area boundary and visible from many key viewing areas. The question was, is seeing wind towers an "adverse impact?" Given the standards for building structures visible from key viewing areas within the Scenic Area, and the fact that wind towers violate all those standards, there is an objective way of saying that seeing towers would be an adverse impact.

I do not know if the WA facilities siting authority has standards, but it should. Personally, I think that in certain cases it might be OK to see wind towers, and the standard could be quantified. I remember that in a previous version of the managemnet plan, or in Wasco County's ordinances, no house visible from Key Viewing Areas could be built more than 35 ft. high. On my calculations sheet I have figured how far a 400 ft tower would have to be from the Cook-Underwood Rd. to be the visual equivalent of a structure 35 ft. tall at the Scenic Area boundary, 1 3/8 miles from Cook-Underwood. It would have to be 15.7 miles from the Cook-Underwood Rd. Maybe a standard could be make whereby any wind towers, rather than being totally invisible, would have to be equivalent to allowable heights of structures within the Scenic Area. This would mean nothing could be built really close to the boundary.

I hope that the WA council, like OR, will take into account large scenic values, especially when siting facilities near federally or state recognized preserved areas. I hope also that siting facilities of huge towers right on the boundary and very visible from a National Scenic Area will be rejected. I am for wind power, and find most of the wheat field siting satisfactory. But we do not need to put wind towers everywhere, just as we did not need to dam every river. Let us not make the same mistake again.

Very Sincerely,

Barbara Robinson

P.O. Box [redacted] Mosier, OR 97040 (mailing address)

[redacted] Hwy. 30 W., The Dalles, Or 97058 (street address)

541-296[redacted]

Whistling Ridge
Public Comment
#321

Talburt, Tammy (UTC)

From: Keith Brown <[redacted]@teleport.com>
Sent: Friday, January 14, 2011 9:54 AM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am adamantly opposed to the proposed Whistling Ridge Energy project . I sincerely hope and strongly request that you recommend DENIAL to Governor Gregoire to prevent the project from going forward.

I understand that at least 25 of the behemoths would be placed atop prominent ridges and would be HIGHLY VISIBLE (some for several miles along I-84) from certain key viewing areas within the magnificent Columbia River Gorge National Scenic Area.

If this project were allowed to proceed, I feel there would be irreparable harm not only to wildlife and scenic vistas, but also to significant aspects of our national heritage, including natural, historic and cultural resources of the Columbia River Gorge, 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. Further, I am outraged at the attempts to silence this important feedback.

Just say no to the degradation of a world-reknown scenic and natural species treasure.

Sincerely,

ANN DEHAVEN
Skamania County Resident

Keith Brown
[redacted] Malfait Tracts Rd
Washougal, WA 98671

Whistling Ridge
Public Comment
#322

Talburt, Tammy (UTC)

From: joanna bagatta [redacted]@aol.com>
Sent: Friday, January 14, 2011 9:54 AM
To: EFSEC (UTC)
Subject: Opposed to Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing today to recommend that you deny the Whistling Ridge Energy Project to Governor Gregoire.

The Whistling Ridge Energy Project is within three miles of the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

25 of the projects 50 turbines would be highly visible from key viewing areas of the Columbia River Gorge National 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. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

Please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge.

Sincerely,

joanna bagatta
[redacted]casse ct
mahopac, NY 10541

Whistling Ridge
Public Comment
#323

Talburt, Tammy (UTC)

From: Patricia Chor <[redacted]@comcast.net>
Sent: Friday, January 14, 2011 10:42 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,

Patricia Chor
[redacted] SW Delaney Place
Portland, OR 97225

Talburt, Tammy (UTC)

From: Merle Clifton <[redacted]@yahoo.com>
Sent: Friday, January 14, 2011 10:46 AM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I am opposed the poorly planned Whistling Ridge Energy Project. Please recommend that Governor Gregoire deny the project.

The project itself is the most controversial and problematic wind project ever proposed in Washington State and be highly visible along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington.

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.

I am not alone in my opposition; multiple agencies –including 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.

As stewards of this most precious gift, the Columbia River Gorge, we owe it to ourselves and future generations to preserve it and protect it from harm.

Sincerely,

Merle Clifton
[redacted] Ne Campaign St.
Portland, OR 97218

Whistling Ridge
Public Comment
#325

Talburt, Tammy (UTC)

From: Jeri Tess [redacted]@zgf.com>
Sent: Friday, January 14, 2011 10:50 AM
To: EFSEC (UTC)
Subject: Deny Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

Over the years I have found that I am continually surprised by the incredible beauty of the Columbia River Gorge National Scenic Area. The Gorge is one of the wonders of the world and should be preserved for all future generations.

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,

Jeri Tess
[redacted] SW Wilshire St.
Portland, OR 97225

Whistling Ridge
Public Comment
#326

Talburt, Tammy (UTC)

From: OL' DOUG [redacted]@gmail.com>
Sent: Friday, January 14, 2011 10:56 AM
To: EFSEC (UTC)
Subject: Whistling Ridge Project

State of Washington Energy Facility Site Evaluation
Council Jan. 14,20011
1300 Evergreen Park Drive P.O.Box 43172
Olympia, WA. 98504

Evaluation Council:

Having lived in White Salmon for over 60 years I wanted to express my opinion on the Whistling Ridge project.

What a great opportunity to bring new jobs into the area, add tax revenues for badly needed assistance in the county plus providing clean, renewable energy for the Pacific Northwest. Let's not let this marvelous project slip through our fingers.

DOUG HOLLISTON

Whistling Ridge
Public Comment
#327

Talburt, Tammy (UTC)

From: Frances Hannah [redacted]@yahoo.com>
Sent: Friday, January 14, 2011 11:04 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.

This area is very beautiful and worth saving for future generations..

Sincerely,

Frances Hannah
[redacted] SE 33rd Way
[redacted]
Vancouver, WA 98683

Talburt, Tammy (UTC)

From: Caroline Cleaver <[redacted]@att.net>
Sent: Friday, January 14, 2011 11:10 AM
To: EFSEC (UTC)
Subject: Reconfigure the Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing to urge the Council to recommend that Governor Gregoire deny the current 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 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,
Caroline Cleaver
Washington State tourist

Caroline Cleaver
[redacted] Grace Lake Drive
Douglasville, GA 30135

Whistling Ridge
Public Comment
#329

Talburt, Tammy (UTC)

From: [redacted]@gmail.com on behalf of Hugh McMahan <[redacted]@gorge.net>
Sent: Friday, January 14, 2011 11:29 AM
To: EFSEC (UTC)
Subject: Whistling Ridge Energy Project Public Comments
Attachments: Whistling Ridge 1-14-11.docx

Hello Washington Energy Facility Site Evaluation Council-

Attached are our comments; the original will be coming US Postal Service. Thank you for the opportunity to provide our input.

Hugh and Linda McMahan
Mount Hood, OR

Hugh and Linda B. McMahan
[redacted] **Herriot Drive**
Mount Hood, OR 97041

January 14, 2011

Washington Energy Facility Site Evaluation Council
905 Plum Street SE
Olympia, WA 98504-3172
By e-mail efsec@utc.wa.gov and US Postal Service

RE: Whistling Ridge Energy Project

Dear Council:

We were unable to attend the recent public hearings and thank you for this opportunity to provide our input and opinion on this ill-conceived project. After the hearings, we are sure you are familiar with the major siting objections. In the interest of brevity, we will emphasize only two in this letter.

One is the inappropriateness of a project of this magnitude in such close proximity to the Columbia Gorge National Scenic Area where the turbines will be visible from many key viewing areas. The statement, "You would not put a wind farm on the rim of the Grand Canyon" expresses our sentiments precisely and we believe the nationally treasured Columbia Gorge National Scenic Area is every bit as grand as the Canyon! It is particularly galling to destroy forests, wildlife, scenery and human health in Washington to send power to California.

Our second area of concern is the impact upon human health by the wind machines. Wind turbines generate infrasonic to ultrasonic noise, low frequency seismic vibrations and moving blade shadows. There is good neurobiology to clearly link these to the Wind Turbine Syndrome symptoms. These include sleep disturbance, headache, tinnitus (ringing or buzzing in the ears), ear pressure, dizziness, vertigo, nausea, visual blurring, rapid heart rate, irritability, difficulty with concentration and memory, and panic episodes associated with sensations of internal pulsation or quivering. Not all individuals exposed to the wind turbines will experience symptoms and those individuals who do become symptomatic may experience one or more of the above. (Please see: Wind Turbine Syndrome, by Nina Pierpont, M.D., Ph.D., published in 2009 by a K-Selected Books.)

Although the Wind Turbine Syndrome has only recently entered the medical lexicon, for those who are susceptible and suffer from it, it is a very real entity and in severe cases those individuals must give up their homes and relocate. We understand there are two residences and one permitted residence within a half-mile of the turbines and 25 residences on Northwestern Lake within 2 miles or so of the turbines. Based on similar proximity to other wind farms, the occupants of these dwellings will be susceptible. If this project goes forward, there should be within the legal paper work just compensation for those individuals forced to relocate.

It is one thing to build a wind farm in the wheat fields of eastern Washington where the farmer gets a generous lease payment from the developer with which he can buy a new house somewhere else if he or a member of the family is susceptible to the Wind Turbine Syndrome. It is another to build the wind farm and inflict possible injury on innocent, uncompensated individuals on adjacent lands.

Sincerely,

Hugh B. McMahan, M.D.

Linda B. McMahan, M.S.W.

Whistling Ridge
Public Comment
#330

Talburt, Tammy (UTC)

From: Renee Schrock <[redacted]@wesd.org>
Sent: Friday, January 14, 2011 11:36 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,

Renee Schrock
[redacted]Welty Avenue SE
Salem, OR 97302

Whistling Ridge
Public Comment
#331

Talburt, Tammy (UTC)

From: Susan Benedict <[redacted]@jfoto.com>
Sent: Friday, January 14, 2011 11:49 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.

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,

Susan Benedict
[redacted] NE Tohomish St.
White Salmon, WA 98672

Whistling Ridge
Public Comment
#332

Talburt, Tammy (UTC)

From: Phyllis Wolfe <[redacted]@earthlink.net>
Sent: Friday, January 14, 2011 11:52 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.

The Pacific Northwest is already losing approximately 25% of its bird species each year. We cannot continue this trend or our plant life and agriculture will also be affected with increased insect infestation.

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,

Phyllis J. Wolfe

Phyllis Wolfe
[redacted]SE Steele St.
Portland, OR 97206

Whistling Ridge
Public Comment
#333

Talburt, Tammy (UTC)

From: Loreley Drach [redacted]@gorge.net>
Sent: Friday, January 14, 2011 12:37 PM
To: EFSEC (UTC)
Subject: WRE public testimony
Attachments: Final EFSEC Testimony Loreley D 14jan2011.pdf

Please accept my attached pdf into the WRE record for the public comment period ending Jan 15, 2011. Thank you. Loreley Drach

Energy Facility Site Evaluation Council
1300 S. Evergreen Park Dr. SW
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

January 14, 2010

Re: Public Comment on Whistling Ridge Energy Project for period ending January 15, 2011

Dear Chair Luce and Members of the Council,

Thank you for the time and diligence assessing the enormous amount of material on the Whistling Ridge Energy matter before you.

At the end of this letter, you will find the following concluding remark, worth repeating here:

> The state should respect the will of the voters, and not sacrifice societal & environmental treasures to benefit, what is ostensibly, one private industrial developer with an energy project of inconsequential value to the PEOPLE of Washington.

It is the voice of the voters of Washington State that I direct your attention to.
In 2006, two million WA voters weighed in on the general issue of energy efficiency and renewable energy, thru Initiative 937. Most of these voters will have no fore-knowledge of the proposed Whistling Ridge Energy (WRE) project, but they expect its government to apply 937's standards, and all other relevant standards, fairly and appropriately.

Washington voters passed Initiative 937, not resoundingly as the WRE applicant claims, but actually by a slim margin. Compare for example, the I-937 vote 52% to 48% (Exhibit LD-A) to a 2010 Resolution that passed 85% to 15% (Exhibit LD-B). Now 85%-15% is a resounding endorsement.

The people who voted on I-937, both for and against, did not vote in favor of rampant renewable energy development. In fact, upon reading of the initiative the language clearly supports the opposite.

Initiative-937, Section 2, Declaration of Policy, first sentence reads: "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" (Exhibit LD-C) (emphasis added)

This is what people voted for, or thought they were voting for:

They voted for "energy conservation."
They voted for "appropriately sited renewable energy."
They voted for "energy independence in the state" (of Washington), not California.

In applying these words to EFSEC's review of WRE, we do not have to get bogged down in rhetoric, or the representations made by this developer. During the Adjudication, the Applicant clearly stated verbally under oath that WRE will not consider energy independence within WA state; WRE would go to the highest bidder.

When determining whether WRE would be appropriately sited, logical minds can only reach one conclusion, it does not pass the definition by any stretch. This project will significantly harm wildlife, likely more than any other industrial turbine project in the state. This project will harm a nationally recognized SCENIC treasure in Washington and loved by people of the state as well as people visiting from afar. It will harm the gorge tourist economy and businesses serving tourism founded on breathtaking scenery, not industrial landscapes.

The people of Washington love their wildlife, forests, beaches, mountains, waterways, and the vast recreational opportunities available to them. We know this because Washingtonians have spoken and voted exhaustively in favor of protecting their special places. Washingtonians have worked hard and paid significantly to protect endangered species such as the spotted owl and salmon as well as other at risk species and ecosystems.

National & State Wildlife Refuges (regardless of political boundary lines on a map), National Parks (regardless of political boundary lines on a map), and our Columbia River Gorge National Scenic Area (regardless of political boundary lines on a map) would be easily considered by Washingtonians as inappropriate places to site massive industrial developments like industrial wind turbine facilities. These facilities would create significant negative impacts to these established areas, for a well-established number of reasons.

Most voters are not commenting individually, thankfully, or we would never get to go home. But they are here in spirit and intent, through Initiative 937. The people have spoken. Many voters did not believe in this renewable bill at all and for those that did, there are expectations. The facilities were to be appropriately sited to benefit Washingtonians. However, for the WRE project, no mitigation can make such an inappropriate location appropriate. Additionally, there is no benefit to the people of Washington, only the detriments.

With the near split decision on I-937, and the careful consideration of I-937's actual language, only one reasonable conclusion is possible: WRE must be denied in its entirety.

The state should respect the will of the voters, and not sacrifice societal & environmental treasures to benefit, what is ostensibly, one private industrial developer with an energy project of insignificant value to the PEOPLE of Washington.

Thank you, the Council of EFSEC, for hearing and considering the voters voice of our great Evergreen State.

Loreley Drach
P.O. Box [redacted]
Underwood WA 98651
Registered Washington Voter

Exhibit LD-A Election Results from 2006 WA state, one page

Elections

ELECTIONS MENU

2006 General Election Results

Measures | Federal Offices | Judicial Offices | Legislative Offices | All Offices | County Results

View Map of Measure Results By County»

Measures		Results by County
Initiative Measure 920 (Estate Tax)	Vote	Vote %
Yes	778,047	38.2115
No	1,258,110	61.7885
Initiative Measure 933 (Property Rights)	Vote	Vote %
Yes	839,992	41.1827
No	1,199,679	58.8173
Initiative Measure 937 (Energy Resources)	Vote	Vote %
Yes	1,042,679	51.7349
No	972,747	48.2651
House Joint Resolution 4223 (Exemption from personal property tax)	Vote	Vote %
Approved	1,581,373	79.8247
Rejected	399,684	20.1753

Exhibit LD-B Election results for 2010 measures, see page 2 of 2 for 85/15% "resounding" vote

November 2, 2010 General

Measures | Federal | Congressional | Legislative | Judicial | Voter Turnout | Export Results

Search

Initiative Measure 1053 Concerning tax and fee increases imposed by state government. County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Yes	1,575,655	63.75 %
No	895,833	36.25 %
Total Votes	2,471,488	100.00%

Initiative Measure 1082 Concerning industrial insurance. County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Yes	991,153	40.91 %
No	1,431,516	59.09 %
Total Votes	2,422,669	100.00%

Initiative Measure 1098 Concerning establishing a state income tax and reducing other taxes. County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Yes	903,319	35.85 %
No	1,616,273	64.15 %
Total Votes	2,519,592	100.00%

Initiative Measure 1100 Concerning liquor (beer, wine and spirits). County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Yes	1,175,302	46.57 %
No	1,348,213	53.43 %
Total Votes	2,523,515	100.00%

Initiative Measure 1105 Concerning liquor (beer, wine and spirits). County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Yes	878,687	34.96 %
No	1,634,516	65.04 %
Total Votes	2,513,203	100.00%

Initiative Measure 1107 Concerns reversing certain 2010 amendments to state tax laws.

County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Yes	1,522,658	60.44 %
No	996,761	39.56 %
Total Votes	**2,519,419**	**100.00%**

Referendum Bill 52 Concerning authorizing and funding bonds for energy efficiency projects in schools.

County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Approved	1,139,527	46.23 %
Rejected	1,325,253	53.77 %
Total Votes	**2,464,780**	**100.00%**

Senate Joint Resolution 8225 Concerns the limitation on state debt.

County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Approved	1,180,552	52.01 %
Rejected	1,089,100	47.99 %
Total Votes	**2,269,652**	**100.00%**

Engrossed Substitute House Joint Resolution 4220 Concerning denying bail for persons charged with certain criminal offenses.

County Results & Map
Last updated on 11/29/2010 9:49 AM

Measure	Vote	Vote %
Approved	2,082,465	84.62 %
Rejected	378,634	15.38 %
Total Votes	**2,461,099**	**100.00%**

Washington Secretary of State
520 Union Ave SE
PO Box 40229, Olympia WA 98504-0229
(360) 902-4180

Exhibit LD-C Initiative 937 , following 10 pages

INITIATIVE 937

I, Sam Reed, Secretary of State of the State of Washington and custodian of its seal hereby certify that, according to the records on file in my office, the attached copy of Initiative Measure No. 937 to the People is a true and correct copy as it was received by this office.

AN ACT Relating to requirements for new energy resources; adding a new chapter to Title 19 RCW; and prescribing penalties.

BE IT ENACTED BY THE PEOPLE OF THE STATE OF WASHINGTON:

NEW SECTION. **Sec. 1.** INTENT. This chapter concerns requirements for new energy resources. This chapter requires large utilities to obtain fifteen percent of their electricity from new renewable resources such as solar and wind by 2020 and undertake cost-effective energy conservation.

NEW SECTION. **Sec. 2.** 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.

NEW SECTION. **Sec. 3.** DEFINITIONS. The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

(1) "Attorney general" means the Washington state office of the attorney general.

(2) "Auditor" means: (a) The Washington state auditor's office or its designee for qualifying utilities under its jurisdiction that are not investor-owned utilities; or (b) an independent auditor selected by a qualifying utility that is not under the jurisdiction of the state auditor and is not an investor-owned utility.

(3) "Commission" means the Washington state utilities and transportation commission.

(4) "Conservation" means any reduction in electric power consumption resulting from increases in the efficiency of energy use, production, or distribution.

(5) "Cost-effective" has the same meaning as defined in RCW 80.52.030.

(6) "Council" means the Washington state apprenticeship and training council within the department of labor and industries.

(7) "Customer" means a person or entity that purchases electricity for ultimate consumption and not for resale.

(8) "Department" means the department of community, trade, and economic development or its successor.

(9) "Distributed generation" means an eligible renewable resource where the generation facility or any integrated cluster of such facilities has a generating capacity of not more than five megawatts.

(10) "Eligible renewable resource" means:

(a) Electricity from a generation facility powered by a renewable resource other than fresh water that commences operation after March 31, 1999, where: (i) The facility is located in the Pacific Northwest; or (ii) the electricity from the facility is delivered into Washington state on a real-time basis without shaping, storage, or integration services; or

(b) Incremental electricity produced as a result of efficiency improvements completed after March 31, 1999, to hydroelectric generation projects owned by a qualifying utility and located in the

Pacific Northwest or to hydroelectric generation in irrigation pipes and canals located in the Pacific Northwest, where the additional generation in either case does not result in new water diversions or impoundments.

(11) "Investor owned utility" has the same meaning as defined in RCW 19.29A.010.

(12) "Load" means the amount of kilowatt-hours of electricity delivered in the most recently completed year by a qualifying utility to its Washington retail customers.

(13) "Nonpower attributes" means all environmentally related characteristics, exclusive of energy, capacity reliability, and other electrical power service attributes, that are associated with the generation of electricity from a renewable resource, including but not limited to the facility's fuel type, geographic location, vintage, qualification as an eligible renewable resource, and avoided emissions of pollutants to the air, soil, or water, and avoided emissions of carbon dioxide and other greenhouse gases.

(14) "Pacific Northwest" has the same meaning as defined for the Bonneville power administration in section 3 of the Pacific Northwest electric power planning and conservation act (94 Stat. 2698; 16 U.S.C. Sec. 839a).

(15) "Public facility" has the same meaning as defined in RCW 39.35C.010.

(16) "Qualifying utility" means an electric utility, as the term "electric utility" is defined in RCW 19.29A.010, that serves more than twenty-five thousand customers in the state of Washington. The number of customers served may be based on data reported by a utility in form 861, "annual electric utility report," filed with the energy information administration, United States department of energy.

(17) "Renewable energy credit" means a tradable certificate of proof of at least one megawatt-hour of an eligible renewable resource where the generation facility is not powered by fresh water, the certificate includes all of the nonpower attributes associated with that one megawatt-hour of electricity, and the certificate is verified by a renewable energy credit tracking system selected by the department.

(18) "Renewable resource" means: (a) Water; (b) wind; (c) solar energy; (d) geothermal energy; (e) landfill gas; (f) wave, ocean, or tidal power; (g) gas from sewage treatment facilities; (h) biodiesel

fuel as defined in RCW 82.29A.135 that is not derived from crops raised on land cleared from old growth or first-growth forests where the clearing occurred after the effective date of this section; and (i) biomass energy based on animal waste or solid organic fuels from wood, forest, or field residues, or dedicated energy crops that do not include (i) wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenic; (ii) black liquor byproduct from paper production; (iii) wood from old growth forests; or (iv) municipal solid waste.

(19) "Rule" means rules adopted by an agency or other entity of Washington state government to carry out the intent and purposes of this chapter.

(20) "Year" means the twelve-month period commencing January 1st and ending December 31st.

NEW SECTION. **Sec. 4.** ENERGY CONSERVATION AND RENEWABLE ENERGY TARGETS. (1) Each qualifying utility shall pursue all available conservation that is cost-effective, reliable, and feasible.

(a) By January 1, 2010, using methodologies consistent with those used by the Pacific Northwest electric power and conservation planning council in its most recently published regional power plan, each qualifying utility shall identify its achievable cost-effective conservation potential through 2019. At least every two years thereafter, the qualifying utility shall review and update this assessment for the subsequent ten-year period.

(b) Beginning January 2010, each qualifying utility shall establish and make publicly available a biennial acquisition target for cost-effective conservation consistent with its identification of achievable opportunities in (a) of this subsection, and meet that target during the subsequent two-year period. At a minimum, each biennial target must be no lower than the qualifying utility's pro rata share for that two-year period of its cost-effective conservation potential for the subsequent ten-year period.

(c) In meeting its conservation targets, a qualifying utility may count high-efficiency cogeneration owned and used by a retail electric customer to meet its own needs. High-efficiency cogeneration is the sequential production of electricity and useful thermal energy from a common fuel source, where, under normal operating conditions, the facility has a useful thermal energy output of no less than thirty-

three percent of the total energy output. The reduction in load due to high-efficiency cogeneration shall be: (i) Calculated as the ratio of the fuel chargeable to power heat rate of the cogeneration facility compared to the heat rate on a new and clean basis of a best-commercially available technology combined-cycle natural gas-fired combustion turbine; and (ii) counted towards meeting the biennial conservation target in the same manner as other conservation savings.

(d) The commission may determine if a conservation program implemented by an investor-owned utility is cost-effective based on the commission's policies and practice.

(e) The commission may rely on its standard practice for review and approval of investor-owned utility conservation targets.

(2)(a) Each qualifying utility shall use eligible renewable resources or acquire equivalent renewable energy credits, or a combination of both, to meet the following annual targets:

(i) At least three percent of its load by January 1, 2012, and each year thereafter through December 31, 2015;

(ii) At least nine percent of its load by January 1, 2016, and each year thereafter through December 31, 2019; and

(iii) At least fifteen percent of its load by January 1, 2020, and each year thereafter.

(b) A qualifying utility may count distributed generation at double the facility's electrical output if the utility: (i) Owns or has contracted for the distributed generation and the associated renewable energy credits; or (ii) has contracted to purchase the associated renewable energy credits.

(c) In meeting the annual targets in (a) of this subsection, a qualifying utility shall calculate its annual load based on the average of the utility's load for the previous two years.

(d) A qualifying utility shall be considered in compliance with an annual target in (a) of this subsection if: (i) The utility's weather-adjusted load for the previous three years on average did not increase over that time period; (ii) after the effective date of this section, the utility did not commence or renew ownership or incremental purchases of electricity from resources other than renewable resources other than on a daily spot price basis and the electricity is not offset by equivalent renewable energy credits; and (iii) the utility invested at least one percent of its total annual retail revenue

requirement that year on eligible renewable resources, renewable energy credits, or a combination of both.

(e) The requirements of this section may be met for any given year with renewable energy credits produced during that year, the preceding year, or the subsequent year. Each renewable energy credit may be used only once to meet the requirements of this section.

(f) In complying with the targets established in (a) of this subsection, a qualifying utility may not count:

(i) Eligible renewable resources or distributed generation where the associated renewable energy credits are owned by a separate entity; or

(ii) Eligible renewable resources or renewable energy credits obtained for and used in an optional pricing program such as the program established in RCW 19.29A.090.

(g) Where fossil and combustible renewable resources are cofired in one generating unit located in the Pacific Northwest where the cofiring commenced after March 31, 1999, the unit shall be considered to produce eligible renewable resources in direct proportion to the percentage of the total heat value represented by the heat value of the renewable resources.

(h)(i) A qualifying utility that acquires an eligible renewable resource or renewable energy credit may count that acquisition at one and two-tenths times its base value:

(A) Where the eligible renewable resource comes from a facility that commenced operation after December 31, 2005; and

(B) Where the developer of the facility used apprenticeship programs approved by the council during facility construction.

(ii) The council shall establish minimum levels of labor hours to be met through apprenticeship programs to qualify for this extra credit.

(i) A qualifying utility shall be considered in compliance with an annual target in (a) of this subsection if events beyond the reasonable control of the utility that could not have been reasonably anticipated or ameliorated prevented it from meeting the renewable energy target. Such events include weather-related damage, mechanical failure, strikes, lockouts, and actions of a governmental authority that adversely affect the generation, transmission, or distribution of an eligible renewable resource under contract to a qualifying utility.

(3) Utilities that become qualifying utilities after December 31, 2006, shall meet the requirements in this section on a time frame comparable in length to that provided for qualifying utilities as of the effective date of this section.

NEW SECTION. **Sec. 5.** RESOURCE COSTS. (1)(a) A qualifying utility shall be considered in compliance with an annual target created in section 4(2) of this act for a given year if the utility invested four percent of its total annual retail revenue requirement on the incremental costs of eligible renewable resources, the cost of renewable energy credits, or a combination of both, but a utility may elect to invest more than this amount.

(b) The incremental cost of an eligible renewable resource is calculated as the difference between the levelized delivered cost of the eligible renewable resource, regardless of ownership, compared to the levelized delivered cost of an equivalent amount of reasonably available substitute resources that do not qualify as eligible renewable resources, where the resources being compared have the same contract length or facility life.

(2) An investor-owned utility is entitled to recover all prudently incurred costs associated with compliance with this chapter. The commission shall address cost recovery issues of qualifying utilities that are investor-owned utilities that serve both in Washington and in other states in complying with this chapter.

NEW SECTION. **Sec. 6.** ACCOUNTABILITY AND ENFORCEMENT. (1) Except as provided in subsection (2) of this section, a qualifying utility that fails to comply with the energy conservation or renewable energy targets established in section 4 of this act shall pay an administrative penalty to the state of Washington in the amount of fifty dollars for each megawatt-hour of shortfall. Beginning in 2007, this penalty shall be adjusted annually according to the rate of change of the inflation indicator, gross domestic product-implicit price deflator, as published by the bureau of economic analysis of the United States department of commerce or its successor.

(2) A qualifying utility that does not meet an annual renewable energy target established in section 4(2) of this act is exempt from the administrative penalty in subsection (1) of this section for that year if the commission for investor-owned utilities or the auditor for

all other qualifying utilities determines that the utility complied with section 4(2) (d) or (i) or 5(1) of this act.

(3) A qualifying utility must notify its retail electric customers in published form within three months of incurring a penalty regarding the size of the penalty and the reason it was incurred.

(4) The commission shall determine if an investor-owned utility may recover the cost of this administrative penalty in electric rates, and may consider providing positive incentives for an investor-owned utility to exceed the targets established in section 4 of this act.

(5) Administrative penalties collected under this chapter shall be deposited into the energy independence act special account which is hereby created. All receipts from administrative penalties collected under this chapter must be deposited into the account. Expenditures from the account may be used only for the purchase of renewable energy credits or for energy conservation projects at public facilities, local government facilities, community colleges, or state universities. The state shall own and retire any renewable energy credits purchased using moneys from the account. Only the director of general administration or the director's designee may authorize expenditures from the account. The account is subject to allotment procedures under chapter 43.88 RCW, but an appropriation is not required for expenditures.

(6) For a qualifying utility that is an investor-owned utility, the commission shall determine compliance with the provisions of this chapter and assess penalties for noncompliance as provided in subsection (1) of this section.

(7) For qualifying utilities that are not investor-owned utilities, the auditor is responsible for auditing compliance with this chapter and rules adopted under this chapter that apply to those utilities and the attorney general is responsible for enforcing that compliance.

NEW SECTION. **Sec. 7.** REPORTING AND PUBLIC DISCLOSURE. (1) On or before June 1, 2012, and annually thereafter, each qualifying utility shall report to the department on its progress in the preceding year in meeting the targets established in section 4 of this act, including expected electricity savings from the biennial conservation target, expenditures on conservation, actual electricity savings results, the utility's annual load for the prior two years, the amount of megawatt-hours needed to meet the annual renewable energy target, the amount of megawatt-hours of each type of eligible renewable resource

acquired, the type and amount of renewable energy credits acquired, and the percent of its total annual retail revenue requirement invested in the incremental cost of eligible renewable resources and the cost of renewable energy credits. For each year that a qualifying utility elects to demonstrate alternative compliance under section 4(2) (d) or (i) or 5(1) of this act, it must include in its annual report relevant data to demonstrate that it met the criteria in that section. A qualifying utility may submit its report to the department in conjunction with its annual obligations in chapter 19.29A RCW.

(2) A qualifying utility that is an investor-owned utility shall also report all information required in subsection (1) of this section to the commission, and all other qualifying utilities shall also make all information required in subsection (1) of this section available to the auditor.

(3) A qualifying utility shall also make reports required in this section available to its customers.

NEW SECTION. **Sec. 8.** RULE MAKING. (1) The commission may adopt rules to ensure the proper implementation and enforcement of this chapter as it applies to investor-owned utilities.

(2) The department shall adopt rules concerning only process, timelines, and documentation to ensure the proper implementation of this chapter as it applies to qualifying utilities that are not investor-owned utilities. Those rules include, but are not limited to, rules associated with a qualifying utility's development of conservation targets under section 4(1) of this act; a qualifying utility's decision to pursue alternative compliance in section 4(2) (d) or (i) or 5(1) of this act; and the format and content of reports required in section 7 of this act. Nothing in this subsection may be construed to restrict the rate-making authority of the commission or a qualifying utility as otherwise provided by law.

(3) The commission and department may coordinate in developing rules related to process, timelines, and documentation that are necessary for implementation of this chapter.

(4) Pursuant to the administrative procedure act, chapter 34.05 RCW, rules needed for the implementation of this chapter must be adopted by December 31, 2007. These rules may be revised as needed to carry out the intent and purposes of this chapter.

NEW SECTION. **Sec. 9.** CONSTRUCTION. The provisions of this chapter are to be liberally construed to effectuate the intent, policies, and purposes of this chapter.

NEW SECTION. **Sec. 10.** SEVERABILITY. If any provision of this act or its application to any person or circumstance is held invalid, the remainder of the act or the application of the provision to other persons or circumstances is not affected.

NEW SECTION. **Sec. 11.** SHORT TITLE. This chapter may be known and cited as the energy independence act.

NEW SECTION. **Sec. 12.** CAPTIONS NOT LAW. Captions used in this chapter are not any part of the law.

NEW SECTION. **Sec. 13.** Sections 1 through 12 of this act constitute a new chapter in Title 19 RCW.

--- END ---

Talburt, Tammy (UTC)

From: Sarah Burr Arnold <[redacted]@gorge.net>
Sent: Friday, January 14, 2011 12:52 PM
To: EFSEC (UTC)
Subject: Whistling Ridge proposal

Sarah Burr Arnold
[redacted]@gorge.net
January 14, 2011

Stephen Posner
EFSEC
efsec @utc.wa.gov

Dear Mr. Posner,

I am writing to ask that the EFSEC recommend to Governor Gregoire that the proposal submitted by Whistling Ridge Energy be denied.

Wind turbines on the top of a ridge miles away are a beautiful sight but wind turbines on the top of a ridge nearby overwhelm and destroy appreciation of the scenery. This can be seen by driving along the Columbia to the east where large numbers of wind turbines have been placed on the top of ridges running along the river. They introduce a jarringly industrial appearance in this rural area and so visually dominate that it is very difficult to perceive and appreciate the landscape.

One of the points of the Columbia Gorge Scenic Area is to preserve
the appearance of the Gorge, a place unlike any other in the nation.
Industrial wind turbines so close to the River and so eye-catchingly place on a ridge would dramatically alter the appearance of the Gorge in this location. This alteration will affect the lives of all of the people who live in or near and drive through the Gorge, as well as reducing the visual value of the Gorge for the tourists who bring a lot of money to this area every year.

To permit development of this site would run counter to the legislated mandate to assure aesthetically pleasing surroundings for the citizens of Washington.

I am surprised, in view of SDS's plan to build a destination resort on the old Broughton Lumber mill site on the River below the proposed wind farm, that they would even consider actions that would degrade rural scenic beauty, one of the attractions for tourists.

The proposed development site is in an area designated to protect the Northern Spotted Owl. Wind turbines are especially destructive to bird life. It is incongruent to place wind turbines in a location dedicated to protecting birds.

I also am wondering about the long term effect on the people who live
in Underwood of having wind turbines so close to their residences.
Wind turbines are noisy which can be disturbing to people sensitive to noise. I am not sure that the long term effects on humans of living near wind turbines are known. Why take actions that could have long term negative effects on the near by human population, when development could be delayed until possible effects have been researched?

This proposal involves the conversion of a working forest to an industrial wind farm. I believe that working forest should be maintained as working forest. Like farm land, if forests are converted to other uses there is an irreplaceable loss of forest land.

If the energy produced were needed by and to be used by the local community then there might be some justification for the development. However, I understand that all of the energy produced will be going to California so the proposed development would not provide any compensation for the damage to the view and the environment for the local citizens who will be impacted most by the damage.

Thank you for your attention to these comments.

Sincerely yours
Sarah Burr Arnold

Whistling Ridge
Public Comment
#335

Talburt, Tammy (UTC)

From: JoEllen Darling [redacted]@embarqmail.com>
Sent: Friday, January 14, 2011 1:08 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,

JoEllen Darling
[redacted]Berge Road
Stevenson, WA 98648

Whistling Ridge
Public Comment
#336

Talburt, Tammy (UTC)

From: Sue Layton [redacted]@aol.com>
Sent: Friday, January 14, 2011 2:01 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,

Sue Layton
[redacted] NE Laurelwood Lane
Fairview, OR 97024

Whistling Ridge
Public Comment
#337

Talburt, Tammy (UTC)

From: Glenn Teague <[redacted]@pacifier.com>
Sent: Friday, January 14, 2011 2:07 PM
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,

Glenn Teague
[redacted] Highland Dr
Vancouver, WA 98661

Whistling Ridge
Public Comment
#338

Talburt, Tammy (UTC)

From: Laurie Balmuth [redacted]@gorge.net>
Sent: Friday, January 14, 2011 3:17 PM
To: EFSEC (UTC)
Subject: No to Whistling Ridge

To the Energy Facility Site Evaluation Council,

This project will not solve the energy crisis and will only serve to put more millions in the pockets of developers. It will not help the Northwest because there is already a surplus of energy here. The turbine parts must be transported through populated areas on narrow roads, they are over 400 feet in height, consequently, the impact of construction will be greater than normal affecting a great many farms and residences on Underwood mountain. Last but certainly not least is the visual impact to the Columbia Gorge National Scenic Area. Giant towers, whirling blades and flashing lights are an unconscionable destruction of the pristine natural beauty the Scenic Area was created to preserve. This project is unnecessary, burdensome to farmers and residents of Washington and damaging to the Columbia Gorge Scenic Area. There is no valid reason this project should be permitted to go forward

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,

Laurie Balmuth
BOX [redacted]
[redacted] May Street
Hood River, OR 97031

Whistling Ridge
Public Comment
#339

Talburt, Tammy (UTC)

From: maggie turner [redacted]@worldstar.com>
Sent: Friday, January 14, 2011 4:26 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,

maggie turner
[redacted] SW Briar Ln
Portland, OR 97225

Whistling Ridge
Public Comment
#340

Talburt, Tammy (UTC)

From: Brad Sifers <[redacted]@hotmail.com>
Sent: Friday, January 14, 2011 4:35 PM
To: EFSEC (UTC)
Subject: SDS proposed wind farm...

Hello ,

The SDS windfarm is not a good idea. I do believe that renewable energy is a great powersource and I have never talked to anyone who thought otherwise. But with that said, there is a right place and then there is a wrong place for a windfarm. And unfortunately the suggested site for this proposed windfarm is not in the right place. The area is heavily forested and that is how it should be utilized. Though it has been completely hacked down since I can remember (probably the reason SDS wants to develop it...bad management of resources...?) it still is teaming with wildlife and scenic beauty. Yes, it will create jobs and there will be some money but in the longterm... nine permanent jobs. I do believe tourism generates more money than the lumber industry and their proposed ideas of trying to make money. How will this project effect the thousands of people that travel to the gorge yearly to see its beauty? And not just from the river below, but from the mountains that rise above. This is an important decision that will effect everyone in the gorge, from the people that live near the area that will deal with the traffic and noise pollution from the wind turbines to the tourist trying to enjoy not only the scenic beauty of the gorge but the wildlife that inhabit the area. SDS and Broughton have descent intentions but this proposal is not thought through. Like I stated before, good idea, wrong place. When considering this proposal think not only about quick jobs and money but think of the presedence you are setting and the long term effects that this project could potentially create. This area is special and should be used to generate trees, not power. Thank you for taking the time to hear my voice.

Sincerely,

Brad Sifers
Gorge Resident

Whistling Ridge
Public Comment
#341

Talburt, Tammy (UTC)

From: [redacted]@gmail.com on behalf of Sonja Lane <[redacted]@wwnw.org>
Sent: Friday, January 14, 2011 4:37 PM
To: EFSEC (UTC)
Subject: Whistling Ridge Energy Project

Dear Members of the Energy Facilities Site Evaluation Council:

After more than a year of input, the record is clearly sufficient to provide the basis for you to make a positive recommendation to the Governor.

WindWorks! Northwest supports the development – in its entirety – of the Whistling Ridge Energy Project. The EIS has found no significant impacts and the proposed wind farm will be built entirely on private land outside the boundary of the Scenic Area. Moreover, locally elected officials representing the citizens of Skamania County actively back the project; they know what the electorate wants for the sliver of developable lands lying within the county.

While people's opinions are not a factor in your evaluation, it is still noteworthy that the Northwest public remains supportive of wind power development. According to a poll of 1200 Washington, Idaho and Oregon residents just released by KUOW news, "An overwhelming percentage – 80% actually of residents of rural areas of the Northwest – support wind farms being developed within sight of their homes. What's more interesting is that 50% strongly – not just somewhat – but strongly support this." (KUOW, January 7, 2011)

EFSEC has demonstrated time and again that it knows how to separate truth from fiction and reach a recommendation consistent with its mandate. Please continue in that tradition.

Thank you for your hard work on this case.

Sincerely,
Todd Myers

Executive Director,
WindWorks! Northwest
PO Box [redacted]
Ellensburg, WA 98926

Talburt, Tammy (UTC)

From: Amy Carlson <[redacted]@comcast.net>
Sent: Friday, January 14, 2011 4:46 PM
To: EFSEC (UTC)
Subject: Please Oppose Whistling Ridge Energy Project

Dear Energy Facility Site Evaluation Council,

I am writing to ask you to recommend to Governor Gregoire denial of the Whistling Ridge Energy Project.

I am seriously concerned about this impacts of this proposed project on the surrounding natural areas and on the scenic vistas in the Columbia River Gorge National Scenic Area. I spend a lot of my time recreating in the Gorge and I studied the Gorge National Scenic Area Act in my undergraduate work at Willamette University.

The Whistling Ridge Energy Project is within 3 miles of many culturally and environmentally significant areas including: the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Columbia River Highway, the Ice Age Floods National Geologic Trail and the Columbia River Gorge National Scenic Area.

Half of the 50 turbines in the project would be highly visible from key viewing areas of the Columbia River Gorge National Scenic Area. Each turbine would be more than 420 feet tall and equipped with blinking lights that would be visible for miles in all directions. The project would be highly visible from State Route 14, a designated scenic byway in Washington.

I applaud efforts to generate sustainable energy sources, but not at any cost, and I believe we can do better than this proposed project as we seek to meet our energy needs.

Again, I ask that you please recommend denial of the Whistling Ridge project to Governor Gregoire and protect our historic trails and scenery in the Columbia Gorge. It is our responsibility to leave a legacy that our grandchildren can be proud of.

Sincerely,

Amy Carlson
[redacted] N Emerson
Portland, OR 97217

Whistling Ridge
Public Comment
#343

Talburt, Tammy (UTC)

From: LuAnne Mierow <[redacted]@hotmail.com>
Sent: Friday, January 14, 2011 5:24 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,

LuAnne Mierow
[redacted] S. Jewell Rd.
Portland, OR 97004

Whistling Ridge
Public Comment
#344

Talburt, Tammy (UTC)

From: Peggie Schwarz [redacted]@comcast.net>
Sent: Friday, January 14, 2011 5:28 PM
To: EFSEC (UTC)
Subject: I oppose Whistling Ridge Energy Project

Dear Washington Energy Facility Site Evaluation Council,

I am opposed the poorly planned Whistling Ridge Energy Project. Please recommend that Governor Gregoire deny the project.

The project itself is the most controversial and problematic wind project ever proposed in Washington State and be highly visible along the 2,000-foot elevation ridgeline boundary of the Columbia River Gorge National Scenic Area near White Salmon, Washington.

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.

I am not alone in my opposition; multiple agencies –including 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,

Peggie Schwarz
[redacted]SW Cullen Blvd
Portland, OR 97221

Whistling Ridge
Public Comment
#345

Talburt, Tammy (UTC)

From: scott hulbert [redacted]@yahoo.com>
Sent: Friday, January 14, 2011 7:26 PM
To: Talburt, Tammy (UTC)
Cc: EFSEC (UTC); dawn
Subject: Whistling Ridge Energy Project: Feedback from Scott Hulbert
Attachments: MargoBlosserResume.pdf; ScottHulbertLetterToEFSEC.pdf; WRidgeWindPowerDataSources.pdf; WRidgeWindPowerMap1.pdf; WRidgeWindPowerMap2.pdf

Tammy:

I have been attempting to send my comments to efsec@utc.wa.gov. Unfortunately, the address is currently not working. Can you please see that my comments and Maps are forwarded up the proper channels? (5 attachments included)

Thank you,

Scott Hulbert

Scott Hulbert
[redacted] NW Lincoln Street
White Salmon, WA 98672
Energy Facility Site Evaluation Council
1300 S. Evergreen Park Dr. SW
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

January 14, 2010

Dear Chair Luce and Members of the Council,

My name is Scott Hulbert. I am a resident of White Salmon, Washington, and I would be directly affected by the development of the Whistling Ridge Energy Project.

While I recognize the general need to develop renewable sources of energy, I firmly believe that we should not sacrifice one of our nation's most precious and sensitive landscapes for a single, marginal energy project, especially when there are plenty of more appropriate locations for this type of project. The Whistling Ridge Project would provide only minimal benefits, and yet would significantly harm treasured landscapes, sensitive wildlife, tourism, and Gorge communities.

To assist with the Council's evaluation of the costs and benefits of the proposed project, I have retained the company Gorge GIS to prepare maps that identify the wind resources at the proposed project site, based on National Renewable Energy Laboratory wind power data and on the Applicant's representations of the project location. I am attaching the resulting maps, which were prepared by a GIS analyst with more than twenty years' experience.

These maps show that much of the project is proposed in "Marginal" (Class 2) wind resource areas.

Other portions of the project would be located in "Fair" (Class 3) wind resource areas. A small portion would be located in "Good" (Class 4) areas. Absolutely no portion of the project would be in "Excellent" (Class 5), "Outstanding" (Class 6), or "Superb" (Class 7) areas.
Many of the turbine
sites with the worst scenic impacts also have the lowest wind speeds.

These maps confirm that the entire project site has only marginal to good wind speeds. The maps also call into question whether this project could provide abundant energy at reasonable cost to the citizens of Washington State.

In conclusion, the marginal benefits of this project simply do not justify the damage that would be incurred to the natural beauty and other sensitive resources of the Columbia River Gorge. I strongly encourage you to recommend that Governor Gregoire deny the Whistling Ridge Energy Project.

Sincerely,

Scott Hulbert

Margo M. Blosser
[redacted]E 3rd, Hood River, Oregon
[redacted]@gorgegis.com
541.806.[redacted]

EXPERIENCE

Gorge GIS
1999-Present
Sole Proprietor GIS Consulting Business
GIS Mapping/GIS Layer Development

- *GIS Zoning Layer Development.* Developed GIS Layers by reading a variety of paper maps and legal descriptions. Worked closely with City Staff to insure correct interpretation of source documents. Used ArcGIS to create GIS layer. **City of Newport, Planning Department, Newport Oregon**
- *Extraction of Utility Poles from LIDAR Data.* Evaluated feasibility of using LIDAR data for locating utility poles. Looked at existing software and algorithms, worked with data from the Corbett Oregon Area. Did demonstration for owner of Terra Spatial. **Terra Spatial, Hood River Oregon**
- *ESRI ArcGIS Network for Small Electic Utility. Evaluated the use of ESRI ArcGIS Network (geometric) for use by a Map Guide/Auto Desk Shop..* Developed Proto Type
- *GIS for Water/Sewer Master Planning.* Demonstration of Water/Sewer Data Model for tracking flow in a geometric network. Evaluation of project scope for integration of TV camera sewer inspection data into a GIS. ***Demonsttation for Wallis Engineering***
- *LIDAR Mapping for River Restoration Planning.* Developed Large format public meeting maps. Used LIDAR to locate side channels suitable for salmon habitat. Developed Flow regime model from LIDAR data. **Columbia Land Trust, Vancouver, Washington**
- *NSA Regional Tax Lot Layer.* Data from six Gorge counties were integrated to create a regional tax lot GIS layer. Tables from Assessment system were normalized to produce correct database relationships. ***Friends of the Columbia Gorge***
- *Significant Environmental Zones.* Developed GIS layers for scenic resources, wildlife habitat and general overlay zones. ***Multnomah County Land Use Planning Division***
- *GIS Wetland Layer Development.,* ***Multnomah County Land Use Planning Division.***
- *Developed Slope Hazards and Contour GIS Layers.* **Multnomah County Land Use Planning Division.**
- *Data Base Design.* Developed data base schema for development review permit tracking database. ***Columbia River Gorge Commission, White Salmon, Washington.***
- *3D Landscape Simulation of Buildout of National Scenic Area.* Developed a 3D model of Underwood Mountain located in the Columbia Gorge National Scenic Area (NSA). The Underwood Mountain model was

developed to evaluate if current standards for protection of visual resources are adequate. The model showed historical, present and future development patterns. New development was added to the model to reflect house color, location and vegetative screening prescribed by the NSA Management Plan. Animations of three different locations were created that showed changes in development for three time intervals. F***riends of the Columbia Gorge***

- *Viewshed Analysis of Wind Turbine Locations.* Created maps showing wind turbine locations that would be visible from a NSA Key Viewing Area. ***Friends of the Columbia Gorge***
- *Buildable Land Inventory of the National Scenic Area.* Wrote ArcObjects programs that determined the amount of built/vacant and underutilized land. Worked with Friends of the Columbia Gorge staff to insure GIS model reflected National Scenic Area Management Plan. Reviewed model with Gorge Commission staff. ***Friends of the Columbia Gorge***
- *Hot Spot Maps of Development of the National Scenic Area.* Debugged ESRI hot spot mapping algorithms (Bug NIM009652, Service Pack 4). Used Getis Ord G* to identify areas with high levels of development capacity. ***Friends of the Columbia Gorge***
- *GIS for Water/Sewer Master Planning.* Demonstration of Water/Sewer Data Model for tracking flow in a geometric network. Evaluation of project scope for integration of TV camera sewer inspection data into a GIS. ***Demonstration for Wallis Engineering***
- *3D GIS Animation for Communicating the Cumulative Effects of Development on Mt Hood.* Using historical air photographs showed the progression of development on the south side of Mt Hood. Projected into future what proposed development at Cooper Spur would look like. ***Hood River Residents Committee and Mt Hood Mazama***
- ***GIS Training***
- Custom lab manual and ArcGIS training. Using clients data developed labs that covered an introduction to GIS. Gave half-day training session to an audience of, Land Use Attorneys, Land Acquisition Staff and Conservation Planners. ***Friends of the Columbia Gorge***
- Custom lab manual and Arc-Info training. Develop workshop for USFS personnel focused on using GIS for Silva-culture treatments, fire response and natural resource management. USFS workshop given by PSU Geography Department.

GIS Application Development

- ArcGIS ArcExplorer VB.net GIS Applicaton to provide GIS Capabilities for Land Use Planning: Application tracked landuse permits, tracked historical permits, buffered taxlots, performed theme-on-theme selection and created a site map. Implemented with ArcExplorer API. ***City of Newport Community Development Department.***
- ArcGIS ArcExplorer/ArcServer VB.net GIS Applicaton ***Geo File-Cabinet.*** Developed Service layer connection to ArcServer through ArcExplorer API to consume ArcServer GIS Parcel Layer. ***Gorge GIS***

- *ArcObjects VB.Net Programming.* Developed custom ArcGIS ArcObjects interface for land use planning in VB.Net. ***Friends of the Columbia Gorge***
- *ArcObjects VB.net Programming.* Developed ArcGIS ArcObjects programs for creation of a regional tax lot layer in VB.Net. ***Friends of the Columbia Gorge***
- *ArcObjects VB.Net Programming.* Developed ArcGIS ArcObjects Programs for creation and maintenance of NSA Ownership. ***Friends of the Columbia Gorge***
- *ArcView/Avenue Programming.* Developed custom ArcView/Avenue permit tracking system. ***Hood River Residents Committee, Hood River, Oregon.***
- *ArcView/Avenue Programming.* Developed custom ArcView/Avenue tools for land use planning site analysis. ***Multnomah County Land Use Division***

ArcView/Avenue Programming for "Land Division Tracking System". Developed custom ArcView/Avenue tools. ***Multnomah County Land Use Division***

Multnomah County. Division of Transportation. Portland Oregon

1997-1999

Department of Environmental Services GIS Coordinator

- Evaluated GIS dating sharing agreement between City of Portland and Multnomah County. Developed costs associated with implementation of agreement. Identified "pit-falls" of agreement worked with stakeholders to develop new strategy.
- Developed preliminary timeline of all County GIS projects.
- Developed and conducted County GIS needs assessment.
- Prototyped conversion of AutoCad roads data to GIS shape files.
- Prototyped conversion of Micro Station CAD tax lot data to ESRI GIS shape files.
- Wrote ArcView/Avenue GIS interface to a Microsoft Access database.
- Designed Transportation Planning GIS layers using Arc/Info's Route data structure.
- Provided demonstration of ArcView Network Analyst routing capabilities to Fleet Management staff.
- Imported GPS data from County Surveyor for comparison to tax maps.

Clark County. Department of Assessment and Taxation. Vancouver WA.

1993-1997

Geographic Information System Analyst

- Responsible for providing GIS Services for Clark County 911 Center
- Participated in emergency preparedness drill with 911 center staff

- Developed custom Arcview/Avenue GIS link for 911-dispatch system. Address data from 911 dispatch Computer Aided Dispatch systems were geocoded "on-the-fly" and displayed in ArcView.
- Wrote AML programs to create address range GIS layer from Clark Counties roads layer. Address ranges were to be used for 911-Dispatch. Utilized Network "Turn Table" data structure.
- Worked with 911 Center to develop GIS mapping products
- . Provided geocoding services for Crime Analysis maps.
- Wrote Avenue/ArcView GIS programs for Crime Analysis GIS Application.
- Project Manager/Cartographer for award winning Clark County Shaded Relief map. Map won 1st place at URISA National Conference and was published on the cover of URISA, Volume 8, November 2, Fall 1996.
- Project/Manger for Clark County Road Atlas. Coordinated efforts of GIS technicians to produce road atlas.
- Ran weekly training sessions for GIS technicians.
- Provided Data Analysis for Department of Assessment Staff.

Info-Tec Development Inc Contractor for the BLM. Portland Or.
1992-1993

Geographic Information Systems Analyst

- Part of Forest Ecosystem Management Team, Spatial Analysis Group. Developed Arc/INFO maps for 10 different land management options that balanced silva culture treatments with habitat preservation. Plans identified key watersheds intended for future watershed analysis.

- Developed Arc/Info GRID AML programs for automated watershed basin delineation for the entire State of Oregon

- Prototyped GIS data structures for watershed GIS tile system for the entire state of Oregon.

Portland State University. Portland Oregon.
1990-1992

Graduate Research Assistant

- Lead GIS Programmer for Spatial Data Index. Research project for USGS to facilitate GIS data sharing.
- Data analysis for "Buildable Land Inventory" for City of Portland
- Developed Arc/Info training manuals for USFS GIS workshop.

Columbia River Gorge Commission. White Salmon, WA.
1989-1990

Geographic Information Systems Analyst

- Developed Arc/Info maps for support of the National Scenic Area

Act.

- Developed "Cartographic Suitability Model" to determine preliminary land use designations for the National Scenic Area.

Department of Natural Resources. SW Timber Unit. Castle Rock WA.
1988-1989

Geographic Information Systems Cartographer

- Responsible for the analysis and cartographic display of data to support forest management using Arc/INFO Software.
- Developed AML GIS computer programs for support of GIS data use.
- Worked with Field Foresters to track forest stand prescriptions using Arc/Info software.

EDUCATION

Portland State University. Portland Oregon

- BA Geography, Specializing in Mapping, Physical Geography, Digital Cartography and Remote Sensing
- Graduate Level Course work in Geography, specializing in Land Use Planning, GIS and Information Management.

GIS SKILLS

- Visual Nature 3D Modeling Software: *Intermediate Skills*
- ArcGIS ArcMap, ArcCatalog, ArcToolbox: *Expert Skills*
- ArcGIS , Spatial Analyst, 3D Analyst, Network Analyst: *Expert Skills*
- WorkStation Arc/Info: *Expert Skills*
- ArcServer: Intermediate *Skills*
- ArcExplorer SDK Kit, Expert *Skills*
- ArcSDE, *Intermediate Skills*
- SQL Server: *Intermediate Skills*
- MS Access: *Intermediate Skills*
- ArcObjects, VBA, Programming: Expert *Skills*
- ArcObjects, Visual Basic.NET Programming: Expert *Skills*
- Avenue Programming: *Expert Skills*
- Unix AWK programming: *Expert Skills*
- HTML: *Intermediate Skills*
- ERDAS Image Processing Software: *Expert Skills*

TRAINING

- Remote Sensing of Wetlands. Workshop from CRR ASPRS 2008.
- Looking Above the Terrain Model: LIDAR for Vegetation Assessment. Workshop at 2008 ASPRS Conference.
- Intro to Programming Microsoft .NET with Visual Studio
- Training Participant, Seminar for GIS in Support of Emergency Management. University of Wisconsin.
- Arc/Info GIS Software Training. WA. Dept Natural Resources, Olympia WA.
- ERDAS Image Processing Software. Pacific Meridian, Portland Oregon
- Arc/Info GRID GIS Software. ESRI, Olympia WA.
- ArcView Avenue GIS Programming Language. ESRI, Olympia WA.
- Advanced Visual Basic Programming Language. STEP Technology, Portland Oregon.
- Unix System Administration. Hewlett Packard, Menlo Park, Ca.
- Land Records Modernization. 1998 ESRI Training

AWARDS, PAPERS AND COMMITTESS

- GIS 3D Animations for Communicating the Cumulative Effects of Development. *Presentation GIS in Action Conference, 2004*
- Oregon Geographic Information Council. GIS Professional Certification Plan Oregon Geospatial Enterprise Office (GEO) Oregon Geographic Information Council
- Member of Oregon Task Force for Surveying GIS and Mapping. Task Force on Surveying/ GIS/ Mapping
- Session Moderator *GIS in Action Conference.* Is it Surveying or is it GIS, 2001
- Desktop GIS Mapping. *GIS in Action Conference, Portland Or, 1994*
- Modeling Address Ranges. *ESRI National Conference, Palm Springs Ca 1995.*
- http://gis.esri.com/library/userconf/proc95/to300/p258.html
- Computer-Aided Dispatch and ArcView. *ESRI National Conference, 1997.* http://www.esri.com/library/userconf/proc97/PROC97/ABSTRACT/A535.HTM
- Publication of Clark County Shaded Relief Map on the cover of *the Journal of Urban and Regional Processing, 1996*
- President Columbia River Region American Society of Photogrammerty and Remote Sensing *(ASPRS)*, 2002.

Scott Hulbert
742 NW Lincoln Street
White Salmon, WA 98672

Energy Facility Site Evaluation Council
1300 S. Evergreen Park Dr. SW
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

January 14, 2010

Dear Chair Luce and Members of the Council,

My name is Scott Hulbert. I am a resident of White Salmon, Washington, and I would be directly affected by the development of the Whistling Ridge Energy Project.

While I recognize the general need to develop renewable sources of energy, I firmly believe that we should not sacrifice one of our nation's most precious and sensitive landscapes for a single, marginal energy project, especially when there are plenty of more appropriate locations for this type of project. The Whistling Ridge Project would provide only minimal benefits, and yet would significantly harm treasured landscapes, sensitive wildlife, tourism, and Gorge communities.

To assist with the Council's evaluation of the costs and benefits of the proposed project, I have retained the company Gorge GIS to prepare maps that identify the wind resources at the proposed project site, based on National Renewable Energy Laboratory wind power data and on the Applicant's representations of the project location. I am attaching the resulting maps, which were prepared by a GIS analyst with more than twenty years' experience.

These maps show that much of the project is proposed in "Marginal" (Class 2) wind resource areas. Other portions of the project would be located in "Fair" (Class 3) wind resource areas. A small portion would be located in "Good" (Class 4) areas. Absolutely no portion of the project would be in "Excellent" (Class 5), "Outstanding" (Class 6), or "Superb" (Class 7) areas. Many of the turbine sites with the worst scenic impacts also have the lowest wind speeds.

These maps confirm that the entire project site has only marginal to good wind speeds. The maps also call into question whether this project could provide abundant energy at reasonable cost to the citizens of Washington State.

In conclusion, the marginal benefits of this project simply do not justify the damage that would be incurred to the natural beauty and other sensitive resources of the Columbia River Gorge. I strongly encourage you to recommend that Governor Gregoire deny the Whistling Ridge Energy Project.

Sincerely,

Scott Hulbert

Wind Power Classes Maps, Whistling Ridge Energy Project

The Wind Power Classes maps for the Whistling Ridge Energy Project were compiled by Margo Blosser, Gorge GIS, using ArcGIS 9.3.

The GIS layers were obtained from the following sources:

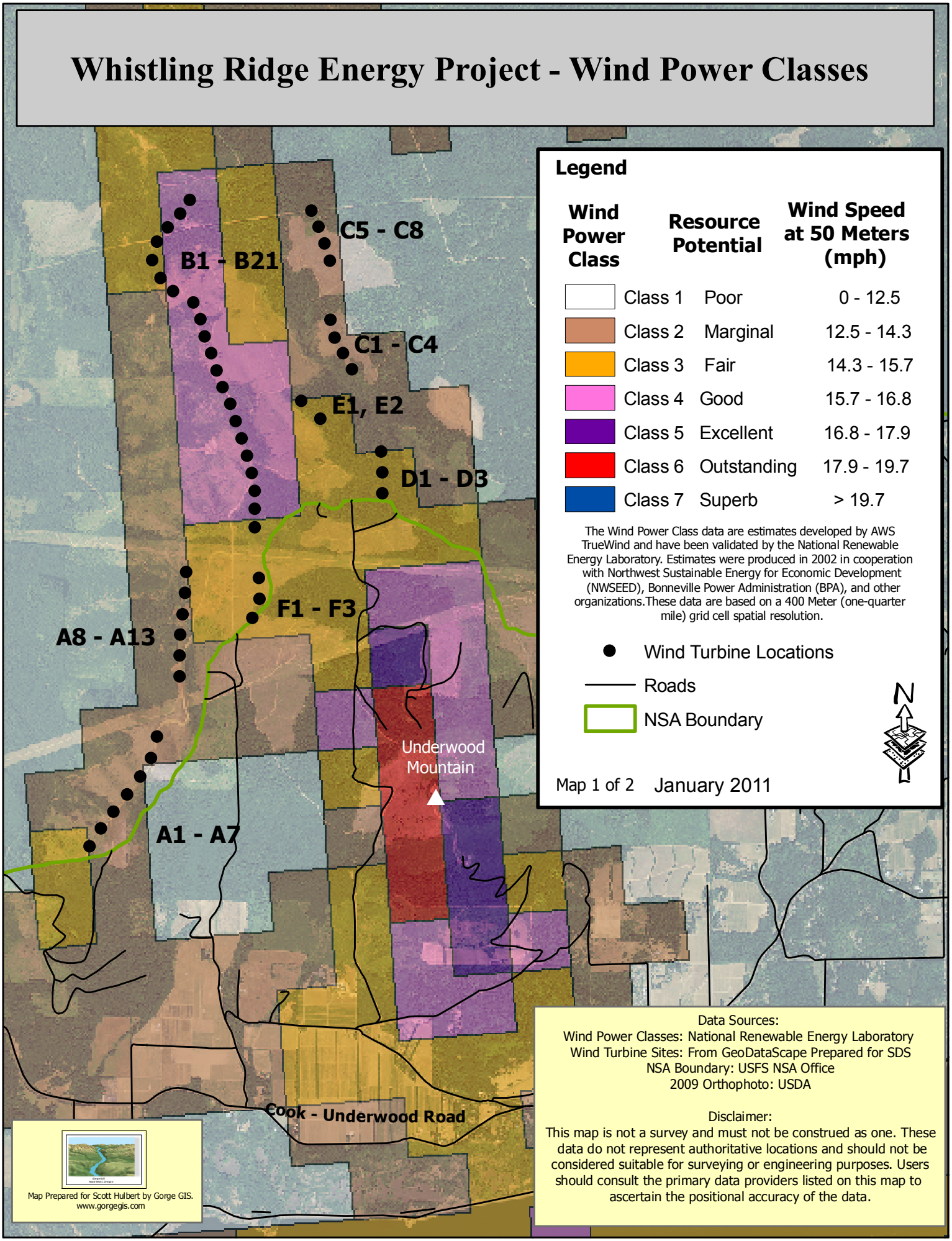
Layer	Source
Wind Power Classes	National Renewable Energy Laboratory (NREL) web site, www.nrel.gov. The pnw_50mwindnouma.shp file was downloaded from the NREL FTP site. Metadata verified via consultation with NREL representative Donna Hiller.
Wind Turbine Locations	Data prepared for SDS/Whistling Ridge Energy, apparently by GeoDataScape. Verified via visual comparison with SDS Lumber's "Proposed Project Elements" map. SDS data and map provided to Gorge GIS by Friends of the Columbia Gorge.
10 Meter Digital Elevation Model (DEM)	Bureau of Land Management web site, www.blm.gov.
Hillshade data	Created by Gorge GIS from the 10 Meter DEM.
National Scenic Area (NSA) boundary and roads within the NSA	USFS National Scenic Area Office, Hood River, Oregon.
2009 Orthophoto	USDA Natural Resources Conservation Service.
Roads outside of the NSA	Digitized from 2009 Orthophoto, verified with the Columbia River Gorge 2007 National Scenic Area paper map.

To the best of my knowledge, these data represent the best publicly available data to show the Wind Power Classes at the Whistling Ridge Energy Project location.

It should be noted that NREL states in its documentation that the Wind Power Classes were generated from a 400 Meter GRID cell dataset.

Margo Blosser
Gorge GIS

Whistling Ridge Energy Project - Wind Power Classes



Legend

Wind Power Class	Resource Potential	Wind Speed at 50 Meters (mph)
Class 1	Poor	0 - 12.5
Class 2	Marginal	12.5 - 14.3
Class 3	Fair	14.3 - 15.7
Class 4	Good	15.7 - 16.8
Class 5	Excellent	16.8 - 17.9
Class 6	Outstanding	17.9 - 19.7
Class 7	Superb	> 19.7

The Wind Power Class data are estimates developed by AWS TrueWind and have been validated by the National Renewable Energy Laboratory. Estimates were produced in 2002 in cooperation with Northwest Sustainable Energy for Economic Development (NWSEED), Bonneville Power Administration (BPA), and other organizations.These data are based on a 400 Meter (one-quarter mile) grid cell spatial resolution.

- Wind Turbine Locations
- Roads
- NSA Boundary

N

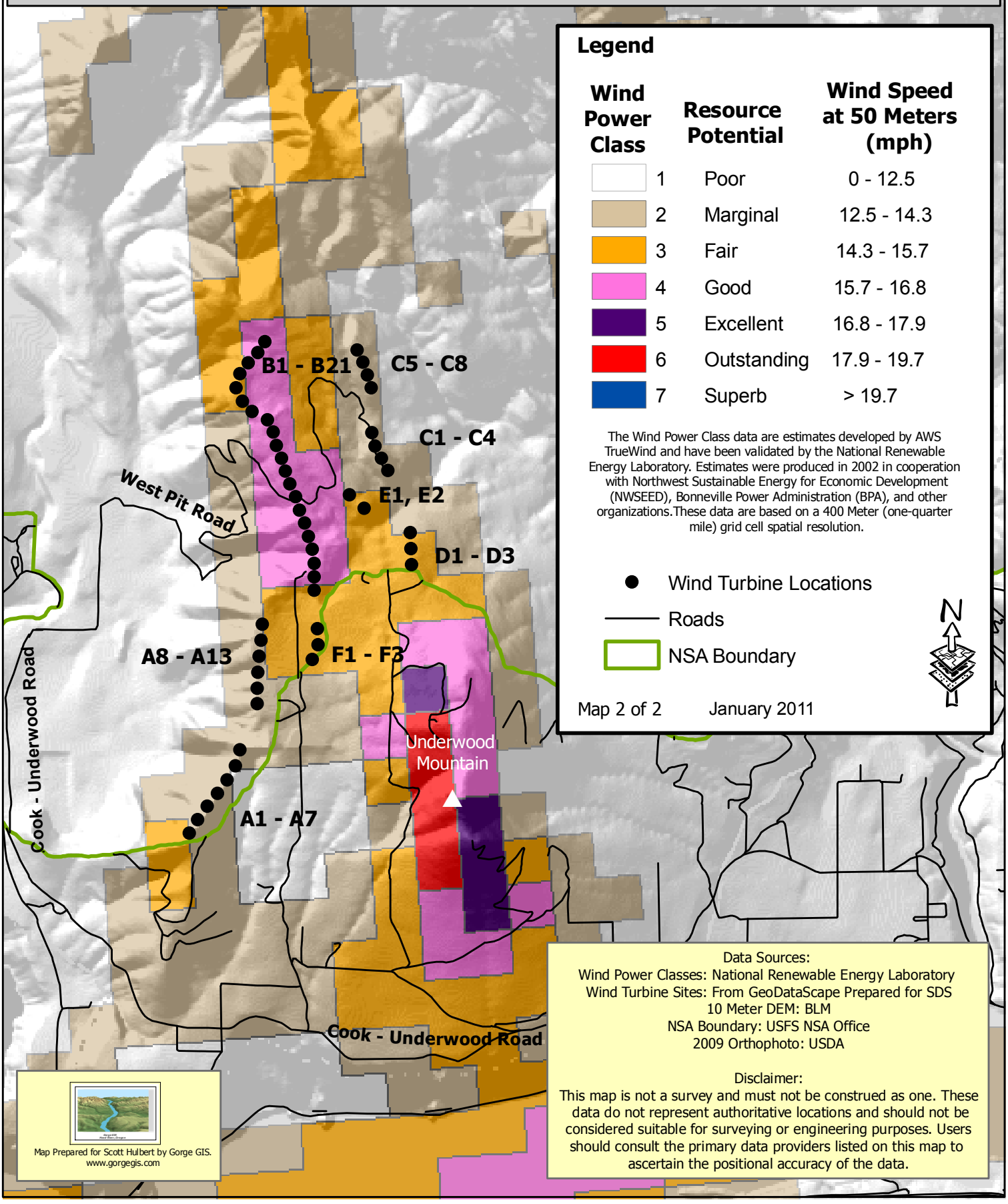
Map 1 of 2 January 2011

Data Sources:
Wind Power Classes: National Renewable Energy Laboratory
Wind Turbine Sites: From GeoDataScape Prepared for SDS
NSA Boundary: USFS NSA Office
2009 Orthophoto: USDA

Disclaimer:
This map is not a survey and must not be construed as one. These data do not represent authoritative locations and should not be considered suitable for surveying or engineering purposes. Users should consult the primary data providers listed on this map to ascertain the positional accuracy of the data.

Map Prepared for Scott Hulbert by Gorge GIS.
www.gorgegis.com

Whistling Ridge Energy Project - Wind Power Classes



Legend

Wind Power Class		Resource Potential	Wind Speed at 50 Meters (mph)
	1	Poor	0 - 12.5
	2	Marginal	12.5 - 14.3
	3	Fair	14.3 - 15.7
	4	Good	15.7 - 16.8
	5	Excellent	16.8 - 17.9
	6	Outstanding	17.9 - 19.7
	7	Superb	> 19.7

The Wind Power Class data are estimates developed by AWS TrueWind and have been validated by the National Renewable Energy Laboratory. Estimates were produced in 2002 in cooperation with Northwest Sustainable Energy for Economic Development (NWSEED), Bonneville Power Administration (BPA), and other organizations.These data are based on a 400 Meter (one-quarter mile) grid cell spatial resolution.

- Wind Turbine Locations
- Roads
- NSA Boundary

N

Map 2 of 2 January 2011

Map Prepared for Scott Hulbert by Gorge GIS.
www.gorgegis.com

Data Sources:
Wind Power Classes: National Renewable Energy Laboratory
Wind Turbine Sites: From GeoDataScape Prepared for SDS
10 Meter DEM: BLM
NSA Boundary: USFS NSA Office
2009 Orthophoto: USDA

Disclaimer:
This map is not a survey and must not be construed as one. These data do not represent authoritative locations and should not be considered suitable for surveying or engineering purposes. Users should consult the primary data providers listed on this map to ascertain the positional accuracy of the data.

Whistling Ridge
Public Comment
#346

Posner, Stephen (UTC)

From: Jennifer De Groot [[redacted]@yahoo.com]
Sent: Friday, January 14, 2011 7:28 PM
To: Posner, Stephen (UTC)
Subject: Whistling Ridge is a mistake

Stephen,

I own a home and 2.5 acres of land in Underwood, Washington and I oppose the plan to construct wind turbines in my community. My husband and I purchased our home (our first) in 2005, and have had nothing but nightmares in our dealings with SDS andSkamania County commissioners and planners. When we purchased our home in the National Scenic Area, we had 20 acres of forested, county land behind us. The county auctioned the land off without the knowledge of the majority of neighboring homeowners, removed a state biologist that documented eight threatened squirrel nests on the land, and has turned a blind eye to the recent flooding we have experienced. They only seemed more than willing to go along with anything SDS wants to do with the land on a daily basis.

I mention this only to give a current and personal account of how SDS and the county have dealt with us on our land issues. In the past few years, our community has become divided with those opposed and those in support of the wind farm. In the earlier years, we used to discuss the environmental impacts of a Spotted owl corridor near the proposed Whistling Ridge project. How would this affect wildlife? Now this topic seems to be a dead one. In the last year, SDS logged virtually the whole hillside and "removed" this wildlife issue.

I support wind generation. I voted for renewal energy as a Washington voter. I didn't vote for massive wind turbines to be placed near my children's school and home. I didn't vote to have the surrounding National Scenic Area clearcut for wind generators. I didn't vote for my roads to be widened, and for the delays. And, ultimately, I will have to deal with the reality that our property values will plummet with SDS's new ventures. Wind farms. Vineyards. Industrial waste sites. Condos at the old Broughton Lumber Mill. These are their plans for our community. Proposed projects like the Whistling Ridge Wind Farm, if approved, will kill the rural, scenic charm we initial moved here for.

Please oppose this plan.

Sincerely,
Jennifer De Groot

Whistling Ridge
Public Comment
#347

Talburt, Tammy (UTC)

From: [redacted]@gorge.net
Sent: Friday, January 14, 2011 8:46 PM
To: Talburt, Tammy (UTC)
Subject: public comment for EFSEC
Attachments: U.S. Census Hood River County.pdf; U.S. Census Klickitat County.pdf; U.S. Census Skamania County.pdf

Dear EFSEC,

My name is Vicki Pryse. I am a citizen of Skamania County. I am opposed to the Whistling Ridge Energy Project and I am concerned about the very misleading representations made by project advocates regarding the supposedly dire economic conditions in Skamania County. I've attached data from the most recent U.S. Census that sheds some light on the actual economic conditions in Skamania County.

The U.S. Census shows that Skamania County is actually in fine shape, particularly when compared to neighboring, and other, rural counties. For example, Skamania has the largest median household income of three central gorge counties - Skamania, Klickitat, and Hood River (OR). Skamania had an increase of 35.6% in private non-farm employment from 2000-2007, compared to 10.3% for the Washington as a whole. And interestingly, Klickitat County thinks it's doing so well economically, with all the wind energy it's brought to its county, but the census numbers show otherwise.

Other information in this census data also contradicts the claims of project proponents and local officials that have made a living off false claims regarding the economic conditions in this county.

Please base your decision on the Whistling Ridge Project on credible sources, such as the U.S. Census, rather than the misleading assertions of project advocates.

Sincerely,

Vicki Pryse

[redacted] Hale Drive

Underwood, WA 98651

State & County QuickFacts

Hood River County, Oregon

People QuickFacts	Hood River County	Oregon
Population, 2009 estimate	21,883	3,825,657
Population, percent change, April 1, 2000 to July 1, 2009	7.2%	11.8%
Population estimates base (April 1) 2000	20,411	3,421,437
Persons under 5 years old, percent, 2009	7.5%	6.5%
Persons under 18 years old, percent, 2009	26.6%	22.8%
Persons 65 years old and over, percent, 2009	12.7%	13.5%
Female persons, percent, 2009	50.7%	50.4%
White persons, percent, 2009 (a)	94.5%	89.8%
Black persons, percent, 2009 (a)	0.8%	2.0%
American Indian and Alaska Native persons, percent, 2009 (a)	1.6%	1.6%
Asian persons, percent, 2009 (a)	1.5%	3.7%
Native Hawaiian and Other Pacific Islander, percent, 2009 (a)	0.2%	0.3%
Persons reporting two or more races, percent, 2009	1.5%	2.6%
Persons of Hispanic or Latino origin, percent, 2009 (b)	27.4%	11.2%
White persons not Hispanic, percent, 2009	68.5%	79.6%
Living in same house in 1995 and 2000, pct 5 yrs old & over	52.0%	46.8%
Foreign born persons, percent, 2000	16.4%	8.5%
Language other than English spoken at home, pct age 5+, 2000	24.7%	12.1%
High school graduates, percent of persons age 25+, 2000	78.2%	85.1%
Bachelor's degree or higher, pct of persons age 25+, 2000	23.1%	25.1%
Persons with a disability, age 5+, 2000	3,139	593,301
Mean travel time to work (minutes), workers age 16+, 2000	19.1	22.2
Housing units, 2009	8,978	1,638,583
Homeownership rate, 2000	64.9%	64.3%
Housing units in multi-unit structures, percent, 2000	15.6%	23.1%
Median value of owner-occupied housing units, 2000	$152,400	$152,100
Households, 2000	7,248	1,333,723
Persons per household, 2000	2.70	2.51
Median household income, 2008	$48,895	$50,165
Per capita money income, 1999	$17,877	$20,940
Persons below poverty level, percent, 2008	13.2%	13.5%

Business QuickFacts	Hood River County	Oregon
Private nonfarm establishments, 2007	921	113,389[1]
Private nonfarm employment, 2007	9,757	1,477,553[1]
Private nonfarm employment, percent change 2000-2007	27.1%	9.0%[1]
Nonemployer establishments, 2007	1,746	261,731
Total number of firms, 2002	2,127	299,505
Black-owned firms, percent, 2002	F	0.7%
American Indian and Alaska Native owned firms, percent, 2002	F	1.0%

Asian-owned firms, percent, 2002	F	3.0%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	F	0.1%
Hispanic-owned firms, percent, 2002	F	2.1%
Women-owned firms, percent, 2002	S	29.5%
Manufacturers shipments, 2002 ($1000)	D	45,864,552
Wholesale trade sales, 2002 ($1000)	128,237	56,855,958
Retail sales, 2002 ($1000)	219,415	37,896,022
Retail sales per capita, 2002	$10,594	$10,756
Accommodation and foodservices sales, 2002 ($1000)	39,637	5,527,223
Building permits, 2009	49	7,039[1]
Federal spending, 2008	116,747	27,530,151[1]

Geography QuickFacts	Hood River County	Oregon
Land area, 2000 (square miles)	522.35	95,996.79
Persons per square mile, 2000	39.1	35.6
FIPS Code	027	41
Metropolitan or Micropolitan Statistical Area	Hood River, OR Micro Area	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.
(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information
F: Fewer than 100 firms
FN: Footnote on this item for this area in place of data
NA: Not available
S: Suppressed; does not meet publication standards
X: Not applicable
Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, Census of Population and Housing, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report
Last Revised: Monday, 16-Aug-2010 08:49:49 EDT

State & County QuickFacts

Klickitat County, Washington

People QuickFacts	Klickitat County	Washington
Population, 2009 estimate	20,554	6,664,195
Population, percent change, April 1, 2000 to July 1, 2009	7.3%	13.1%
Population estimates base (April 1) 2000	19,161	5,894,143
Persons under 5 years old, percent, 2009	6.0%	6.8%
Persons under 18 years old, percent, 2009	22.8%	23.6%
Persons 65 years old and over, percent, 2009	17.0%	12.1%
Female persons, percent, 2009	50.0%	50.0%
White persons, percent, 2009 (a)	92.8%	83.8%
Black persons, percent, 2009 (a)	0.4%	3.9%
American Indian and Alaska Native persons, percent, 2009 (a)	3.5%	1.8%
Asian persons, percent, 2009 (a)	0.8%	7.0%
Native Hawaiian and Other Pacific Islander, percent, 2009 (a)	0.2%	0.5%
Persons reporting two or more races, percent, 2009	2.2%	3.1%
Persons of Hispanic or Latino origin, percent, 2009 (b)	9.7%	10.3%
White persons not Hispanic, percent, 2009	83.8%	74.6%
Living in same house in 1995 and 2000, pct 5 yrs old & over	53.3%	48.6%
Foreign born persons, percent, 2000	6.0%	10.4%
Language other than English spoken at home, pct age 5+, 2000	10.6%	14.0%
High school graduates, percent of persons age 25+, 2000	81.7%	87.1%
Bachelor's degree or higher, pct of persons age 25+, 2000	16.4%	27.7%
Persons with a disability, age 5+, 2000	3,814	981,007
Mean travel time to work (minutes), workers age 16+, 2000	21.9	25.5
Housing units, 2009	9,518	2,813,372
Homeownership rate, 2000	68.8%	64.6%
Housing units in multi-unit structures, percent, 2000	9.6%	25.6%
Median value of owner-occupied housing units, 2000	$110,400	$168,300
Households, 2000	7,473	2,271,398
Persons per household, 2000	2.54	2.53
Median household income, 2008	$40,953	$58,081
Per capita money income, 1999	$16,502	$22,973
Persons below poverty level, percent, 2008	16.8%	11.3%

Business QuickFacts	Klickitat County	Washington
Private nonfarm establishments, 2007	574	184,542[1]
Private nonfarm employment, 2007	3,474	2,501,684[1]
Private nonfarm employment, percent change 2000-2007	-4.4%	10.3%[1]
Nonemployer establishments, 2007	1,422	412,651
Total number of firms, 2002	1,666	467,290
Black-owned firms, percent, 2002	F	1.5%
American Indian and Alaska Native owned firms, percent, 2002	F	1.2%

Asian-owned firms, percent, 2002	F	5.8%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	F	0.2%
Hispanic-owned firms, percent, 2002	F	2.2%
Women-owned firms, percent, 2002	S	29.4%
Manufacturers shipments, 2002 ($1000)	165,979	79,313,884
Wholesale trade sales, 2002 ($1000)	25,039	84,634,499
Retail sales, 2002 ($1000)	56,938	65,262,333
Retail sales per capita, 2002	$2,934	$10,757
Accommodation and foodservices sales, 2002 ($1000)	14,971	8,642,681
Building permits, 2009	91	17,011
Federal spending, 2008	183,940	56,435,550[1]

Geography QuickFacts	Klickitat County	Washington
Land area, 2000 (square miles)	1,872.37	66,544.06
Persons per square mile, 2000	10.2	88.6
FIPS Code	039	53
Metropolitan or Micropolitan Statistical Area	None	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.
(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information
F: Fewer than 100 firms
FN: Footnote on this item for this area in place of data
NA: Not available
S: Suppressed; does not meet publication standards
X: Not applicable
Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, Census of Population and Housing, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report
Last Revised: Monday, 16-Aug-2010 08:50:14 EDT

State & County QuickFacts

Skamania County, Washington

People QuickFacts	Skamania County	Washington
Population, 2009 estimate	10,894	6,664,195
Population, percent change, April 1, 2000 to July 1, 2009	10.4%	13.1%
Population estimates base (April 1) 2000	9,872	5,894,143
Persons under 5 years old, percent, 2009	5.1%	6.8%
Persons under 18 years old, percent, 2009	22.4%	23.6%
Persons 65 years old and over, percent, 2009	13.0%	12.1%
Female persons, percent, 2009	49.7%	50.0%
White persons, percent, 2009 (a)	94.4%	83.8%
Black persons, percent, 2009 (a)	0.3%	3.9%
American Indian and Alaska Native persons, percent, 2009 (a)	2.4%	1.8%
Asian persons, percent, 2009 (a)	0.6%	7.0%
Native Hawaiian and Other Pacific Islander, percent, 2009 (a)	0.2%	0.5%
Persons reporting two or more races, percent, 2009	2.1%	3.1%
Persons of Hispanic or Latino origin, percent, 2009 (b)	6.0%	10.3%
White persons not Hispanic, percent, 2009	89.1%	74.6%
Living in same house in 1995 and 2000, pct 5 yrs old & over	53.0%	48.6%
Foreign born persons, percent, 2000	3.5%	10.4%
Language other than English spoken at home, pct age 5+, 2000	4.9%	14.0%
High school graduates, percent of persons age 25+, 2000	85.9%	87.1%
Bachelor's degree or higher, pct of persons age 25+, 2000	16.8%	27.7%
Persons with a disability, age 5+, 2000	1,604	981,007
Mean travel time to work (minutes), workers age 16+, 2000	29.2	25.5
Housing units, 2009	5,255	2,813,372
Homeownership rate, 2000	73.8%	64.6%
Housing units in multi-unit structures, percent, 2000	5.9%	25.6%
Median value of owner-occupied housing units, 2000	$150,200	$168,300
Households, 2000	3,755	2,271,398
Persons per household, 2000	2.61	2.53
Median household income, 2008	$51,331	$58,081
Per capita money income, 1999	$18,002	$22,973
Persons below poverty level, percent, 2008	12.2%	11.3%

Business QuickFacts	Skamania County	Washington
Private nonfarm establishments, 2007	214	184,542[1]
Private nonfarm employment, 2007	1,662	2,501,684[1]
Private nonfarm employment, percent change 2000-2007	35.6%	10.3%[1]
Nonemployer establishments, 2007	632	412,651
Total number of firms, 2002	682	467,290
Black-owned firms, percent, 2002	F	1.5%
American Indian and Alaska Native owned firms, percent, 2002	F	1.2%

Asian-owned firms, percent, 2002	F	5.8%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	F	0.2%
Hispanic-owned firms, percent, 2002	F	2.2%
Women-owned firms, percent, 2002	S	29.4%
Manufacturers shipments, 2002 ($1000)	NA	79,313,884
Wholesale trade sales, 2002 ($1000)	D	84,634,499
Retail sales, 2002 ($1000)	17,157	65,262,333
Retail sales per capita, 2002	$1,704	$10,757
Accommodation and foodservices sales, 2002 ($1000)	19,973	8,642,681
Building permits, 2009	32	17,011
Federal spending, 2008	63,997	56,435,550[1]

Geography QuickFacts	Skamania County	Washington
Land area, 2000 (square miles)	1,656.44	66,544.06
Persons per square mile, 2000	6.0	88.6
FIPS Code	059	53
Metropolitan or Micropolitan Statistical Area	Portland-Vancouver-Beaverton, OR-WA Metro Area	

1: Includes data not distributed by county.

(a) Includes persons reporting only one race.
(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information
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Last Revised: Monday, 16-Aug-2010 08:50:13 EDT

Whistling Ridge
Public Comment
#348

Talburt, Tammy (UTC)

From: Loreley Drach [redacted]@gorge.net>
Sent: Saturday, January 15, 2011 1:46 PM
To: Talburt, Tammy (UTC)
Subject: FW: WRE public comments
Attachments: Planning response to met towers on forag zone.pdf

Dear Tammy, I tried to send this to the general mailbox, but it got bounced back. Sorry to have to send to yours I hope it goes through. Loreley

---

From: Loreley Drach [mailto:loreley@gorge.net]
Sent: Saturday, January 15, 2011 1:43 PM
To: efsec@utc.wa.gov
Subject: WRE public comments

Dear EFSEC Council Members,

I am concerned by claims I heard during Jason Spadero's testimony on Monday Jan 3, 2011 regarding the "best winds" in the WRE project are in the A 1-7 area.

I would like to direct your attention to the attached letter. This letter from the Skamania County Community Development Department, dated August 11, 2010, clearly shows that no conditional use permits were applied for or permitted to erect MET towers in zoned lands at any time during the past 8 years where the southern 7 towers of the A-Array are proposed. A conditional use permit would have been and still is required to erect a MET tower in this land use area. All other areas are unzoned and would not require a permit from Skamania County to erect a tower and collect data.

At one point during the EFSEC adjudicative hearing, Jason stated that the A 1-7 portion of the project had the "best winds." This is an outrageous unsupported claim! There could not be MET data for the A 1-7 area of the proposed project because of the lack of a permit, per above. A permit would have allowed the applicant to erect a MET tower in this portion of the proposed project. The applicant never did this, and now has no basis to claim any relative or absolute wind regime for this portion of the proposed project. Any honest comparison could only occur from publicly available models or predictions such as those from NREL.

There obviously needs to be a heavy dose of skepticism applied to any claims by the applicant regarding the wind regime at the WRE site.

Thank you for the ability to comment.

Loreley Drach
P.O. Box [redacted]
Underwood WA 98651

Skamania County
Community Development Department

Skamania County Courthouse Annex
Post Office Box 790
Stevenson, Washington 98648
509-427-3900 FAX: 866-266-1534

August 11, 2010

Tom & Loreley Drach
P.O. Box [redacted]
Underwood, WA 98651

RE: Request for Public Information dated July 6, 2010

Dear Mr. & Mrs. Drach,

This letter is in response to your Request for Public Information for any Skamania County Community Development issued permits, allowed administrative uses, or allowed outright uses, within the Forest Agriculture 20 zone in Township-Range-Section 03-10-18 and 03-09-13, between the years 2002 – 2010.

Our department has searched our paper records, electronic records, and emails as per your request. We have not received any applications or permitted any uses within the geographic area described, including records or correspondence related to meteorological towers. There is one Boundary Line Adjustment review, file number BLA-04-09, that was completed in 2004 that falls within the described area however it was not related to meteorological towers as far as any of our record show. Copies of this Boundary Line Adjustment (BLA) file are available to you by confirmation.

Sincerely,

Bonnie L. Anderson
Administrative Assistant

Talburt, Tammy (UTC)

From: Dawn Stover [redacted]@hughes.net>
Sent: Saturday, January 15, 2011 2:44 PM
To: EFSEC (UTC)
Cc: Talburt, Tammy (UTC)
Subject: Dawn Stover's comments on Whistling Ridge
Attachments: WhistlingRidgecomments_DawnStover.pdf; Journal of Wildlife Management 74(5)1089-1097 (2010).pdf

Please see attached comment letter and journal paper.

I am copying Tammy Talburt because I understand that some people have had emails bounced from the EFSEC email address.

Best regards,
Dawn

Dawn Stover
[redacted] Snowden Rd.
White Salmon, WA 98672
509-493-[redacted]

January 15, 2011

Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

To Whom It May Concern:

I am writing to comment on the Whistling Ridge Energy Project. I have previously commented on this project and the Draft Environmental Impact Statement (DEIS). Today I write to respond to the baseless and defamatory attacks that the Applicant's attorneys and at least one witness have made against Dr. K. Shawn Smallwood, an expert witness who has provided sworn testimony to the Council in this matter.

Dr. Smallwood is a world-renowned expert on the wildlife impacts of wind energy projects. Dr. Smallwood's work is highly regarded in his field, and is in fact cited and relied upon by the U.S. Fish and Wildlife Service's Wind Turbine Advisory Committee Recommendations and even in the Whistling Ridge Application and DEIS.

I have more than 25 years of professional experience as a science communicator, and I frequently speak with scientists and read their research papers in scientific journals. I have collaborated with Dr. Smallwood in reviewing wind projects in Klickitat County, and I have been consistently impressed by his professionalism, integrity, thoroughness, and attention to detail.

In their zeal to discredit Dr. Smallwood, the Applicant's attorneys and experts have twisted reality and fabricated controversy out of whole cloth. I am deeply offended at their assassination of Dr. Smallwood's character, and I wish to set the record straight.

The Applicant's first disingenuous attempt to discredit Dr. Smallwood occurs at page 8 of its Opening Statement, an unsigned document filed by Mr. Eric Martin of the Stoel Rives law firm. In an apparent challenge to the veracity of Dr. Smallwood's curriculum vitae (Exhibit 22.01), Stoel Rives has fabricated its own facts about Dr. Smallwood's education, falsely asserting that he has "built a career as an expert consulting witness out of his four years' PhD studies at a single project site—the Altamont Wind Resource Area in California."

To the contrary, and as stated in his vitae, Dr. Smallwood obtained his Ph.D. in Ecology in September 1990 through his work on the ecology of invasive species, which work had nothing to do with wind energy. Approximately ten years later, Dr. Smallwood began studying, analyzing, and writing about wind energy impacts. He has continued that work ever since.

Also contrary to the Applicant's assertions, Dr. Smallwood has studied far more than "one single wind resource area (Altamont)." Although Dr. Smallwood is very familiar

with wind projects in the Altamont area, having studied that area for the past 12 years, he has also studied numerous other wind projects throughout the country. It is nothing less than dishonest to imply that Dr. Smallwood's experience is limited to a "single project site," as the Applicant's attorneys have done here.

Furthermore, Dr. Smallwood has not "built a career as an expert consulting witness." He has simply followed the science where it leads, and in doing so has sometimes come to conclusions that wind developers find uncomfortable. As an independent scientist, Dr. Smallwood hews to the principle that all science—including the wildlife monitoring methods favored by the wind power industry, as well as the results of that monitoring—should be subject to peer review, statistical analysis, verification, and replication.

It is beyond comprehension why the Stoel Rives law firm would ask the Council to disbelieve Dr. Smallwood's curriculum vitae, but that is exactly what they are doing by manufacturing their own version of Dr. Smallwood's educational and professional background.

Next, and perhaps even more reprehensible, Stoel Rives asserts (also at page 8 of the Applicant's Opening Statement) that "*many, many* of [Dr. Smallwood's] 'peer-reviewed' publications were published in journals on which he contemporaneously sat as either Associate Editor or Editorial Board Member" (emphasis added). This assertion is patently untrue. In reality, only one of Dr. Smallwood's 61 peer-reviewed papers was published by a journal at a time when he served as an associate editor or editorial board member for the same journal. Another associate editor handled the administration of peer review for that particular article, and Dr. Smallwood had no say in how it was administered or who performed the reviews.

Stoel Rives and the Applicant seem to be attacking the very system of peer review itself, by implying that this system somehow allowed Dr. Smallwood to edit, review, and/or self-select his own work for publication. Nothing could be further from the truth. Scientific peer review is a rigorous, objective, and transparent process. This Council should repudiate Stoel Rives' smear campaign against Dr. Smallwood and the scientific journals with which he has been affiliated.

Finally, the Applicant's attorneys and witness have seized upon a single word in the title of one of Dr. Smallwood's recent publications—the word "novel" in the following article, which I am attaching to this letter:

> Smallwood, K. S., D. A. Bell, S. A. Snyder, and J. E. DiDonato. 2010. Novel scavenger removal trials increase wind turbine-caused avian fatality estimates. Journal of Wildlife Management 74:1089-1097 + Online Supplemental Material.

The project described in this paper was funded by the Public Interest Energy Research Program administered by the California Energy Commission and the East Bay Regional

Park District. These agencies are accountable to the public, and the paper in question appeared in a widely respected peer-reviewed journal.

The Applicant's witness and attorneys used the words "novel" and "novelty" to describe Dr. Smallwood's work no less than a dozen times in their Opening Statement and Rebuttal Testimony, every time attributing their unique interpretation of "novel" and its derivations to Dr. Smallwood himself. And yet, nowhere do they acknowledge the true meaning of "novel" in the context of Dr. Smallwood's paper.

The article's "novelty" had nothing to do with theory or statistical modeling. Rather, the novelty was in the authors' efforts to avoid scavenger swamping, and their innovative placement of carcasses in front of event-triggered cameras so that the authors would know which species were visiting and removing carcasses. The meaning and context of "novel" is readily apparent in the paper itself:

> Our objectives were to 1) avoid scavenger swamping by placing only 1–5 bird carcasses at a time at randomly chosen locations throughout the study area, 2) record scavenging events by placing each carcass in front of camera traps, 3) compare fatality rates adjusted by scavenger removal rates based on our novel trials and conventional trials . . . .

The Applicant is effectively hoping that the Council will be fooled into discounting the entirety of Dr. Smallwood's testimony based on the Applicant's exploitation of a single word out of context. The Council should reject these word games.

Thank you for the opportunity to comment on the Applicant's inappropriate and dishonest attacks against an accomplished and respected scientist. I ask EFSEC to join me in disavowing such tactics.

Please include my comments in the public record, and include my name on the mailing list for all future notices and decisions.

Sincerely,

Dawn Stover
[redacted] Snowden Rd.
White Salmon, WA 98672
[redacted]@hughes.net

Journal of Wildlife Management 74(5):1089–1097; 2010; DOI: 10.2193/2009-266

Management and Conservation Article

Novel Scavenger Removal Trials Increase Wind Turbine–Caused Avian Fatality Estimates

K. SHAWN SMALLWOOD,[1] *3108 Finch Street, Davis, CA 95616, USA*
DOUGLAS A. BELL, *East Bay Regional Park District, 2950 Peralta Oaks Court, Oakland, CA 94605, USA*
SARA A. SNYDER, *East Bay Regional Park District, 2950 Peralta Oaks Court, Oakland, CA 94605, USA*
JOSEPH E. DIDONATO, *East Bay Regional Park District, 2950 Peralta Oaks Court, Oakland, CA 94605, USA*

ABSTRACT For comparing impacts of bird and bat collisions with wind turbines, investigators estimate fatalities/megawatt (MW) of rated capacity/year, based on periodic carcass searches and trials used to estimate carcasses not found due to scavenger removal and searcher error. However, scavenger trials typically place ≥10 carcasses at once within small areas already supplying scavengers with carcasses deposited by wind turbines, so scavengers may be unable to process and remove all placed carcasses. To avoid scavenger swamping, which might bias fatality estimates low, we placed only 1–5 bird carcasses at a time amongst 52 wind turbines in our 249.7-ha study area, each carcass monitored by a motion-activated camera. Scavengers removed 50 of 63 carcasses, averaging 4.45 days to the first scavenging event. By 15 days, which corresponded with most of our search intervals, scavengers removed 0% and 67% of large-bodied raptors placed in winter and summer, respectively, and 15% and 71% of small birds placed in winter and summer, respectively. By 15 days, scavengers removed 42% of large raptors as compared to 15% removed in conventional trials, and scavengers removed 62% of small birds as compared to 52% removed in conventional trials. Based on our methodology, we estimated mean annual fatalities caused by 21.9 MW of wind turbines in Vasco Caves Regional Preserve (within Altamont Pass Wind Resource Area, California, USA) were 13 red-tailed hawks (*Buteo jamaicensis*), 12 barn owls (*Tyto alba*), 18 burrowing owls (*Athene cunicularia*), 48 total raptors, and 99 total birds. Compared to fatality rates estimated from conventional scavenger trials, our estimates were nearly 3 times higher for red-tailed hawk and barn owl, 68% higher for all raptors, and 67% higher for all birds. We also found that deaths/gigawatt-hour of power generation declined quickly with increasing capacity factor among wind turbines, indicating collision hazard increased with greater intermittency in turbine operations. Fatality monitoring at wind turbines might improve by using scavenger removal trials free of scavenger swamping and by relating fatality rates to power output data in addition to rated capacity (i.e., turbine size). The resulting greater precision in mortality estimates will assist wildlife managers to assess wind farm impacts and to more accurately measure the effects of mitigation measures implemented to lessen those impacts.

KEY WORDS bird fatalities, scavenger removal, scavenger swamping, Vasco Caves Regional Preserve, wind energy, wind turbine.

Wind energy generation has been expanding worldwide for 3 decades, but bird and bat impacts remain largely unknown at the population level and measures to minimize or reduce collisions with wind turbines unproven (Government Accountability Office 2005). Even in California's (USA) 580-megawatt (MW) Altamont Pass Wind Resource Area (APWRA), the world's first large wind farm and notorious for raptor fatalities, years of research has not contributed to detectable bird fatality reductions (Orloff and Flannery 1992, Howell 1997, Smallwood 2008, Smallwood and Karas 2009). Repowering the APWRA's aging, original wind turbines with modern turbines could provide opportunities to more carefully site and operate the new turbines based on lessons learned from past research. However, fatality rate estimates, which are necessary for assessing effectiveness of impact-reduction measures or repowering at wind resource areas worldwide, remain imprecise and potentially biased by common field methods (Smallwood 2007, Smallwood and Thelander 2008). Fatality rate estimates improve as biases are identified and either avoided or countered analytically.

A small repowering project has been proposed in Vasco Caves Regional Preserve, which is managed by East Bay Regional Park District (EBRPD) within the APWRA. The Preserve included 249.7 ha and 292.3 ha with and without wind turbines, respectively. It also supported a nesting population of burrowing owls (*Athene cunicularia*) and its large turbine-free area was intensively used by multiple other species of raptor. East Bay Regional Park District, facing a decision to renew wind farm leases and likely repowering, initiated fatality monitoring and related studies at existing wind turbines in June 2006 to assess ongoing impacts and possible repowering scenarios. Fatality monitoring was needed to estimate fatality rates, but fatality rates must be adjusted by estimates of scavenger removal rates to account for undetected fatalities during periodic fatality searches. Conventional scavenger removal trials might have produced biased estimates by placing groups of 10, 20, and more bird carcasses at once in open terrain study areas, exceeding the capacity of vertebrate scavengers to process and remove all evidence of the carcasses by trial's end (Smallwood 2007). This bias was termed scavenger swamping and can lead to low estimates of fatality rates (Smallwood 2007). We developed a novel scavenger removal trial that attempted to avoid scavenger swamping.

Our purpose was to accurately estimate fatality rates caused by wind turbines in our study area and to compare fatality rates adjusted by conventional scavenger removal rates and by those unbiased by scavenger swamping. Our objectives were to 1) avoid scavenger swamping by placing only 1–5 bird carcasses at a time at randomly chosen

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locations throughout the study area, 2) record scavenging events by placing each carcass in front of camera traps, 3) compare fatality rates adjusted by scavenger removal rates based on our novel trials and conventional trials, 4) compare fatality rates expressed as fatalities/MW of rated capacity and as fatalities/gigawatt-hour (GWh) of energy generated, and 5) test whether fatalities/GWh related to capacity factor, which is a measure of wind turbine efficiency (i.e., capacity factor = MW hr generation/(MW rated capacity)/hr available × 100%, where hr available are typically 8,760 hr/yr). Objectives 4 and 5 emerged toward the study's end, when Babcock and Brown Group supplied us with monthly wind-power generation totals for each of their wind turbines within Vasco Caves Regional Preserve, allowing us to test a hypothesis that less efficient turbines, characterized by more intermittent operations, could be more dangerous to birds and, hence, of highest priority for removal or repowering (Smallwood and Thelander 2004, 2008).

STUDY AREA

Our 249.7-ha study area was 6.4 km southwest of Byron, Contra Costa County, California, within the northern portion of the APWRA. In 2005 EBRPD acquired the property, which included leases to wind companies operating 62 wind turbines representing 21.9 MW of rated capacity. Babcock and Brown, Inc., owned 42 300-kilowatt (KW) Howden model turbines (James Howden and Company, Renfrew, Scotland) in the middle-to-western portions of the study area, and Northwind, Inc., owned 20 65-KW Nordtank model turbines (Nordtank Energy Group, Balle, Denmark) in the northeast portion. The study area included some existing easements for mitigation and conservation purposes and included habitat for San Joaquin kit fox (*Vulpes macrotis mutica*), burrowing owl, long-horned fairy shrimp (*Branchinecta longiantenna*), vernal pool fairy shrimp (*B. lynchi*), California tiger salamander (*Ambystoma californiense*), and California red-legged frog (*Rana aurora draytonii*).

Located in the Inner Coast Range geomorphic province and bordering the Central Valley province, elevations ranged 70 m to 300 m, and slopes were steep above several intermittent streams, springs, and stock ponds. Cattle grazed the study area for longer than a century before being replaced by sheep in late 2005. Soils were well-drained clays and silty clay loams. The major plant community was California Annual Grassland, dominated by nonnative annuals such as rye grass (*Lolium multiflorum*), wild oat (*Avena fatua*), soft chess (*Bromus hordeaceus*), and ripgut brome (*B. diandrus*). Native perennial grasses included creeping wild rye (*Leymus triticoides*), purple needlegrass (*Nassella pulchra*), and one-sided bluegrass (*Poa secunda*).

METHODS

Scavenger Removal Trial

We obtained avian carcasses for use in scavenger trials by salvaging carcasses resulting from bird collisions with automobiles, windows, and other manmade objects and from euthanized birds from wildlife rehabilitation centers or public institutions. We used the latter only if euthanasia was by nonpharmacological means under veterinarian directive. We stored all carcasses frozen prior to use.

From a pool of 10-m digital elevation model centroid points in a Geographic Information System (GIS) layer, we randomly selected 20 carcass placement sites within the 60-m fatality search radius around 52 wind turbines separated by 50 m within rows and farther between rows. Of the 20 placement sites, we only used 1–5 at once and we rotationally placed carcasses to avoid swamping any one turbine area with carcasses and possibly entraining scavengers to repeated food sources. We ran scavenger trials from 12 December 2006 through 28 September 2007. Each placed carcass represented one trial, and was monitored by an event-triggered camera trap (see below) for 21 days or until scavenger(s) removed the carcass, whichever came first. We monitored remaining carcasses weekly for carcass condition through 28 September 2007. We determined carcasses as removed when we could not locate body parts containing flesh or bone or ≥10 disarticulated feathers, or for any reason we felt a fatality searcher would no longer regard the remains as evidence of a fatality. Even if a carcass was removed, we monitored any trace evidence left behind until the study's end.

We marked carcasses to distinguish them from carcasses found during fatality searches by clipping 1 cm of the feather vane from the distal end of each rectrix and remige. We attached a shoat ring or cage clip to each leg at the tibiotarsus or tarsometatarsus and to each wing at the humerus. Shoat rings were steel wire about 3 mm in diameter and 15 mm, 22 mm, and 25 mm long. Cage clips were 8 × 22-mm strips of malleable metal. Usually, we used cage clips on small birds and shoat rings on larger birds, but we discontinued using shoat rings after several weeks because rings rusted quickly, and we discontinued attaching any metal markers to wings of carcasses by halfway through the study. We washed our hands before and after carcass handling, wore fresh latex gloves while handling and marking carcasses, and rinsed all marking tools with alcohol before use to avoid imparting human scent.

After placing a carcass, we mounted an infrared digital game camera (Silent Image [RECONYX, Inc., Holmen, WI], Model RM30, developed for Primos, Inc.) on an angle-iron post and faced the camera north to minimize direct sunlight on the camera's lens and infrared sensors (Fig. S1, <www.wildlife.journals.org>). Usually, we placed cameras 1–2 m from the carcass and <1 m above ground and tilted it slightly downward to center the carcass in the camera's field of view. We recorded the distance and bearing from the carcass to the closest wind turbine and took a position using a Trimble Geo XT or Magellan Meridian Gold Global Positioning System (GPS). We recorded carcass orientation relative to north, photographed the carcass using an object for scale, and then estimated effective vegetation height around the carcass using a 25.4 × 40.6-cm board marked off in 2.54 × 2.54-cm alternating black and white squares.

We trained one camera on each placed carcass, deploying ≤5 cameras at once. Animal intrusion into an infrared field triggered a camera, which took 5 photos at 1-second intervals upon each trigger event, with a camera recovery period of 1 second between trigger events. We checked cameras weekly, but we checked them biweekly during July and August when the cameras' compact flash (CF) cards often filled in 3–4 days due to wind-induced grass movement. The CF memory cards of 256 megabytes (MB) and 512 MB stored up to 5,000 and 10,000 photos, respectively. Images were stamped with time, date, temperature, and moon phase.

During weekly to twice weekly carcass checks, we recorded time and date and whether the carcass was intact (noting feather loss or soft-tissue loss), dismembered, feathers only, or removed. We photographed and described the condition and location of each body part affected by vertebrate scavenging throughout the removal trial or until no evidence remained. When carcass remains were not evident at placement sites, we thoroughly searched the area within a 20-m radius and visually scanned within 60 m of the nearest turbine. If we found no feathers or other carcass remains, we designated the carcass as removed. In cases where exact times of scavenging events were not captured by cameras due to equipment failure or other reasons, we estimated time to scavenging event as the midpoint between field checks of the carcass site, never >7 days.

We employed 2 carcass-free controls, one using a camera trained on a placed black rubber object about the size of a European starling (*Sturnus vulgaris*) and the other with no object. We interspersed these control trials in time and space with the regular trials. Also, during control trials we followed the same field procedures and camera set-up protocols as if we were placing carcasses to control for potential scavenger cues caused by time spent at the site, patterns of human behavior, and presence of vehicles.

Fatality Searches

We searched for bird carcasses from 16 June 2006 through 26 September 2007, every 2 weeks during the first 13 months of the study, then monthly during the last 3 months. Searchers walked parallel paths 6–8 m apart, 0–60 m from the axis of the wind turbine row. Search areas included all wind turbines regardless of their operational status, except for 7 derelict turbines on the west side of the study area and 2 vacant Howden towers that had not operated in many years.

We took ≥2 photos of each carcass, including an engineers' survey card for scale. We recorded species, sex, age class, discovery date, searcher's name, and whether the carcass was discovered during a standard search or incidental to travel or other study activities. We determined cause of death as blade strike, entrapment in the turbine (typically indicated by oiled feathers), collision with electric distribution lines, electrocution on electric distribution pole, auto collision, predation, unknown, or specified other cause. We described the injury(s) and noted carcass condition and surroundings.

Searchers estimated number of days since death and rated carcass articulation 1–5, where 1 indicated complete disassembly of the skeleton and 5 indicated a completely intact, articulated skeleton. The articulation rating represented decay, not dismemberment caused directly by collision, electrocution, or predation. We numbered each body part, described it, reported distance and bearing to the nearest wind turbine, and reported photo numbers. We subsequently monitored each body part. Monitoring data included revisit dates, photo numbers, carcass condition, and color. Upon each visit we described the carcass as stiff or loose, flesh as fresh (i.e., no decay), gooey, or dried; enamel as present or absent on culmen, talons, and feathers; bones as exposed or not; feather color as original, intermediate, bleached, or not applicable; and flies or beetles present as larvae, pupae, or adults. For skeletal remains, we monitored presence, condition, width, and length of the skull, sternum, pelvis, and of each coracoid, scapula, humerus, ulna, radius, carpometacarpus, femur, tibiotarsus, and tarsometatarsus. We classified bone condition as broken, complete, smooth, or weathered.

We estimated fatality rates only from carcasses ≤90 days since death. We determined carcasses were older than 90 days if flesh was gone, culmen and talon enamel had separated from bone, and bones and feathers were bleached, but we also used judgment because carcass decomposition varies with environmental conditions. Presence of blood generally indicated <4 days since death, but rigor mortis, odor, and presence of insect larvae varied with temperature, so we interpreted all these indicators in the environmental context to estimate time since death. We assumed the wind turbine caused the fatality when we found the carcass within the search radius, unless evidence indicated another cause of death.

To assess potential levels of background mortality and crippling bias possibly ongoing in the APWRA, we also recorded bird and bat fatalities found while mapping mammal burrow systems (Smallwood et al. 2009). In late summer to early winter 2006, we mapped mammal burrow systems on foot along transects 12–15 m apart across 381 ha, overlapping all fatality search areas around wind turbines and large areas without wind turbines. In autumn 2007, we mapped burrows in 12 randomly selected plots covering 87.6 ha. We photographed, described, and logged positions with a GPS of carcasses found during burrow mapping.

Analytical Methods

For each wind turbine row, we expressed unadjusted fatality rate (F_U) as the number of fatalities/MW/year, where MW was the sum of the rated power output of the wind turbines composing a row of turbines. For those turbines for which the owners (Babcock & Brown Group) provided power output data, we also expressed F_U as the number of fatalities/GWh, where GWh was the electric energy generated by each Howden wind turbine during the study and averaged across the turbines in the row. We defined the wind turbine row as our study unit because we sometimes could not determine which turbine in the row killed the bird. We added 15 days to the number of years used in the fatality rate estimate, to represent the time period when carcasses could have accumulated before the first search (Smallwood and Thelander 2008).

We adjusted fatality rates (F_A) for carcasses not found due to searcher detection error and scavenger removals as

$$F_A = F_U/(p \times R_C), \quad (1)$$

where p was the proportion of fatalities found by searchers and R_C was the estimated cumulative proportion of carcasses remaining since the last fatality search, assuming wind turbines deposit carcasses at a steady rate through the search interval. We averaged both p and R_C from trials throughout the United States (Smallwood 2007). We also estimated new R_C values based on our novel scavenger removal trials. To estimate R_C, we first used least-squares regression to develop predictive models of the proportions of bird carcasses remaining each day into a fatality search rotation. We developed models for groups of species that were typically small-bodied (i.e., <38 cm body length) or medium- or large-bodied (>38 cm length) and whether raptors or nonraptors. We also developed models from our new scavenger removal trials for groups defined by season of carcass placement (i.e., winter and early spring vs. summer), and we estimated adjusted fatality rates separately for these seasons. We used model predictions to calculate R_C (Smallwood 2007):

$$R_C = \frac{\sum_{i=1}^{I} R_i}{I}, \quad (2)$$

where R_i was the model-predicted proportion of carcasses remaining by the ith day following the initiation of a scavenger removal trial, and I was duration of the scavenger removal trial.

For fatality rate estimates based on conventional scavenger removal trials, we used R_C values from Smallwood (2007; Appendix) for the corresponding search interval (d) and appropriate species group (i.e., small nonraptors, medium and large nonraptors, and rock pigeons [*Columba livia*]). We calculated standard error of the adjusted fatality rate (SE[F_A]) using the delta method (Goodman 1960).

RESULTS

Scavenger Removals

We determined the fates of 63 of 64 avian carcasses placed before remote cameras (Table S1, <www.wildlifejournals.org>) and recorded scavenger visits to 65% of carcasses (Figs. S2 and S3, <www.wildlifejournals.org>). Scavengers removed 50 carcasses (79%) from search areas, including all remains of 37 carcasses (59%) and enough of the remains of 8 carcasses (13%) to probably not have been determined as fatalities by fatality searchers. By 21 days after placement, which was the trial duration we used for predictive model development, scavengers removed 73% of all carcasses. However, of 14 carcasses placed during winter and early spring, scavengers removed only 4 (29%) within 21 days.

Among all carcasses, the first scavenging event averaged 4.45 days (SD = 5.69) since placement (Table S1, <www.wildlifejournals.org>). Only an American crow (*Corvus brachyrhynchos*) carcass remained unvisited until after 30 days

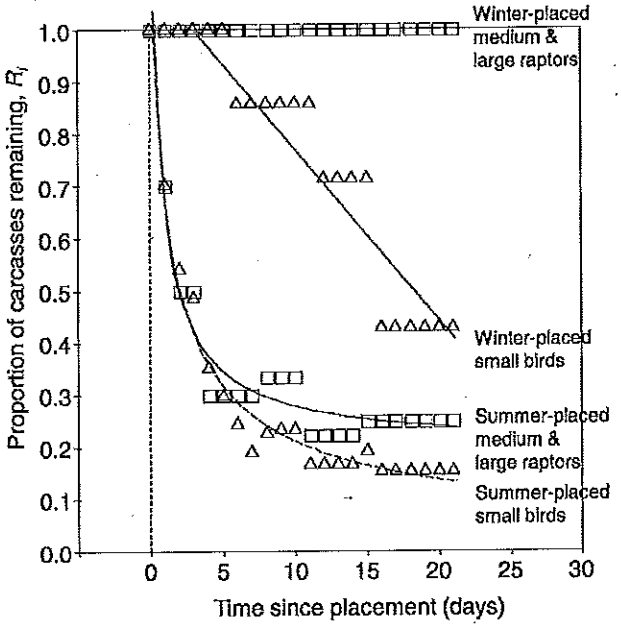

Figure 1. Proportions of carcasses remaining as functions of days since placement for small nonraptor birds (triangles) placed in summer (dashed line) and winter (dotted line) and for medium and large raptors (squares) placed in summer (solid line) and winter (aligned along top of graph) during 12 December 2006 to 28 September 2007 in Vasco Caves Regional Preserve, California, USA.

(Table S1, <www.wildlifejournals.org>). Days until first scavenging event did not relate with species' body mass, suggesting that carcass size did not affect how fast scavengers detected carcasses. Nevertheless, carcass removal rates were slower for large-bodied species than for small-bodied species (Fig. 1; Fig. S4, <www.wildlifejournals.org>).

Power and inverse functions were the least-squares regression models that best fit relationships between proportions of carcasses remaining and days into the scavenger removal trial (Table 1). No model was fit to data representing medium and large raptor removals during winter-time placement because none were removed until after the 21-day trial duration. Average proportions of carcasses remaining, assuming steady rates of carcass deposition, were lower than those based on conventional scavenger removal trials (Fig. 2; Appendix).

Cameras set as controls produced no photos of scavengers during 3 weeks of trials without a carcass. Cameras produced no photos during 4 weeks of trials with an inorganic object placed in front of the camera.

Fatality Rates at Wind Turbines

We found carcasses of 59 birds and 1 bat (Table 2), but only 18 birds (31%) and the bat during standard fatality searches. We found the other 41 birds incidentally while performing other related research activities, and we included 7 of these in fatality rate estimation because we found them within the standard fatality search areas. One fatality had been found by wind company personnel as documented in the wind companies' Wildlife Reporting and Response System.

Table 1. Least-squares regression models fit to the proportion of placed carcasses remaining each day into scavenger removal trials during 2006–2007 in Vasco Caves Regional Preserve, California, USA, where a and b represented the model's intercept and slope parameters, respectively.

Proportion of carcasses remaining	Season placed	Model	a	b	r^2	SE	P
Small birds	Summer	Power	1.010	−0.654	0.95	0.12	<0.001
	Winter	Linear	1.132	−0.033	0.90	0.07	<0.001
	All	Power	1.058	−0.523	0.96	0.09	<0.001
Medium-large raptors	Summer	Inverse	0.201	0.843	0.95	0.04	<0.001
	All	Inverse	0.492	0.520	0.93	0.03	<0.001
All carcasses	Summer	Inverse	0.151	0.930	0.95	0.05	<0.001
	Winter	Power	1.161	−0.143	0.85	0.06	<0.001
	All	Power	0.928	−0.353	0.94	0.04	<0.001

Adjusted by conventional scavenger removal rates, estimated mean annual fatality rates at wind turbines in Vasco Caves Regional Preserve were 4.6 red-tailed hawks (*Buteo jamaicensis*), 4.2 barn owls (*Tyto alba*), 18.1 burrowing owls (*Athene cunicularia*), 28.3 total raptors, and 59.3 total birds (Table 3). Adjusted by new scavenger removal rates, estimated mean annual fatality rates at these wind turbines were 13.4 red-tailed hawks, 12.3 barn owls, 17.7 burrowing owls, 47.5 total raptors, and 98.7 total birds (Table 3).

Adjusted by new scavenger removal rates, we estimated Howden model wind turbines caused about the same annual number of fatalities regardless of whether we calculated fatality rates from MW of rated capacity or GWh of energy actually produced (Table 4). However, fatalities/GWh generated in Howden turbine rows declined quickly with increasing capacity factor (Fig. 3).

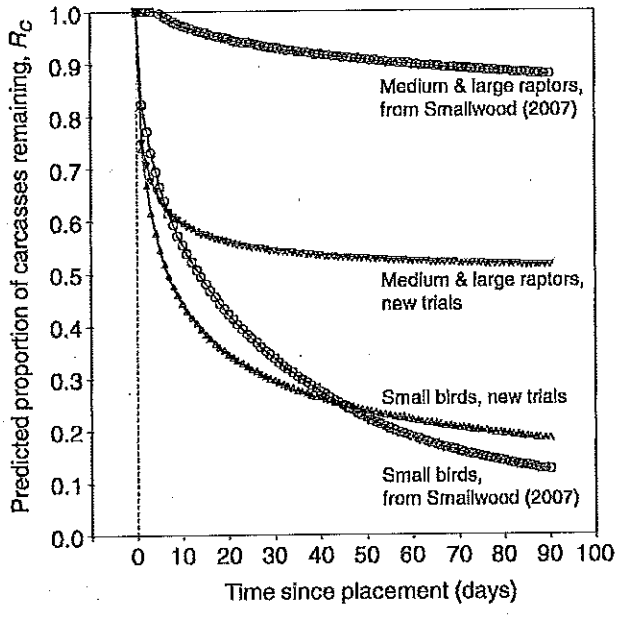

Figure 2. Predicted proportions of bird carcasses remaining each day into a fatality search rotation, R_C, assuming a steady rate of bird collisions at wind turbines (Smallwood 2007). Predicted proportions of carcasses remaining each day into a fatality search rotation declined at similar rates between small birds placed in our new scavenger removal trials (upward triangles) in 2006–2007 in Vasco Caves Regional Preserve, California, USA, and in conventional trials across the United States (lower set of circles), but declined more quickly for medium- and large-sized raptors in our trials (downward triangles) as compared to conventional trials (upper set of circles).

Outside of standard searches, we found a loggerhead shrike (*Lanius ludovicianus*) carcass under an electric distribution line servicing wind turbines, and we assumed the bird died after striking the line. We found carcasses of 2 barn owls and 1 burrowing owl that were dragged from the direction of wind turbines, but we did not include them in fatality rate estimates because 2 of the feather trails were to turbines outside our study and the other did not extend into the fatality search area. We found a severely injured golden eagle (*Aquila chrysaetos*) atop the study area's largest hill, 558 m and 588 m from the nearest Nordtank and Howden wind turbines, respectively. The eagle's injury was typical of wind turbine blade strikes, consisting of a compound fracture to the right radius and ulna. Three weeks after our study we captured an emaciated red-tailed hawk about 500 m from the nearest wind turbine. This hawk also had a compound fracture to the right radius and ulna. We found carcasses of 5 other birds that we thought likely transported themselves away from wind turbines before perishing from injuries, including a red-tailed hawk, a ferruginous hawk (*Buteo regalis*), a Cooper's hawk (*Accipter cooperii*), and an American kestrel (*Falco sparverius*). However, we were uncertain about what killed these birds or how they ended up where we found them. We assumed another 22 bird carcasses we found incidentally or during mammal burrow surveys to have represented background mortality, but we had no way of determining how many had died of natural causes, traveled from wind turbines on their own after being struck, or were transported from wind turbines by vertebrate scavengers.

DISCUSSION

We remain uncertain whether our efforts to avoid scavenger swamping succeeded entirely because we do not know how many volitionally placed carcasses was too many for the scavengers to process and remove. Experimentally varying numbers of placed carcasses might reveal how many carcasses are too many in a particular project area, but such an experiment would require much more space and time than we had available to prevent confounding. As it was, our placement of carcasses automatically exceeded normal deposition rates by wind turbines because our study did not modify ongoing fatality rates. How many additional carcasses is enough to swamp scavengers remains an open question, but at a minimum our trial lessened the effects of scavenger swamping and probably improved accuracy of our fatality rate estimates.

Table 2. Species found dead or mortally wounded in the study area and number used to estimate wind turbine-caused fatality rates in 2006–2007, Vasco Caves Regional Preserve, California, USA.

Common name	No. dead birds found during:				No. used in fatality rate estimation
	Total	Standard search	Incidental	Burrow surveys	
Bat sp.	1	1	0	0	0
Golden eagle	1	0	1	0	0
American kestrel	1	0	1	0	0
Red-tailed hawk	8	2	5	1	4
Ferruginous hawk	1	0	1	0	1
Cooper's hawk	1	0	0	1	0
White-tailed kite	1	0	0	1	0
Great horned owl	2	0	0	2	0
Barn owl	12	1	1	10	3
Burrowing owl	13	8	1	4	10
Rock pigeon (*Columba livia*)	5	3	0	2	2
Say's phoebe (*Sayornis saya*)	1	0	0	1	0
White-throated swift (*Hirundapus caudacutus*)	1	1	0	0	1
Cliff swallow (*Hirundo pyrrhonota*)	1	1	0	0	1
Loggerhead shrike	2	0	0	2	0
European starling	2	0	2	0	2
Common raven	2	0	1	1	0
Western meadowlark (*Sturnella neglecta*)	3	1	0	2	1
Passerine spp.	2	1	0	1	0
All raptors	40	11	10	19	18
All birds	59	18	13	28	25

Our new scavenger removal rates led to higher estimates of fatality rates for most species and groups (Table 5). Using the old removal rates in Table 5, however, we compared our estimated fatality rates in Vasco Caves Regional Preserve to those derived from Alameda County's concurrent fatality monitoring at 2,650 (53%) of the APWRA's old-generation wind turbines (Smallwood and Karas 2009). Our mean fatality rates were lower than the APWRA-wide rates by 53% for red-tailed hawk, 75% for burrowing owl, 58% for all raptors, and 28% for all birds. A possible explanation for differences might be that most wind turbines in our study area, though old-generation, were >3 times larger in rated capacity than most of the rest of the APWRA's wind turbines.

Consistent with other fatality estimates in the APWRA, ours herein were undoubtedly biased low by crippling bias as evidenced by wounded birds we recovered outside of the turbine search areas. One golden eagle walked ≥500 m across a ravine and up a very steep hill from the closest turbines it could have collided with, and a red-tailed hawk had covered at least this distance. One of us (D. A. Bell) participated in the recovery of 2 other wounded golden eagles in the APWRA, showing this species' resilience once grounded by wing injuries. We found one male golden eagle with a broken but not severed right manus 414 m from the closest turbine; the eagle flew and ran another 450 m before capture. Another golden eagle with a severed right manus evaded capture for ≥8 days. Medical examination of the latter eagle, along with photographs of a severed right manus found 28 days prior to its capture, suggested that it survived on the ground for ≥28 days. Whereas some unknown portion of carcasses we found incidentally was undoubtedly caused by predation or other natural causes, wind turbines likely caused some if not many of the

Table 3. Estimates of annual fatalities adjusted by conventional scavenger removal trials conducted across the United States (Smallwood 2007) and new trials intended to prevent scavenger swamping during 2006–2007 in Vasco Caves Regional Preserve, California, USA. Estimates apply to 54 operating wind turbines in 11 rows, totaling 12.52 MW of rated capacity, and include lower and upper confidence limits (LCL and UCL, respectively) of 80% confidence intervals.

Species	Adjusted annual fatalities and 80% CI					
	Old scavenging rates			New scavenging rates		
	$\bar{x}$	LCL	UCL	$\bar{x}$	LCL	UCL
Red-tailed hawk	4.6	−0.7	9.9	13.4	−2.2	29.1
Ferruginous hawk	1.4	−0.4	3.2	4.1	−1.2	9.3
Barn owl	4.2	0.7	7.7	12.3	−0.1	25.2
Burrowing owl	18.1	6.7	29.5	17.7	−0.8	36.1
Rock pigeon	2.8	0.2	5.4	4.9	−1.5	11.2
Cliff swallow	5.7	−2.1	13.6	9.5	−3.8	22.8
European starling	10.9	−1.3	23.1	18.0	−3.0	39.0
Western meadowlark	2.9	−1.0	6.8	4.7	−1.9	11.4
White-throated swift	8.6	−3.1	20.3	14.2	−5.7	34.1
All raptors	28.3	6.3	50.3	47.5	−4.7	99.7
All birds	59.3	−1.0	119.5	98.7	−20.6	218.1

Table 4. Estimates of annual fatalities caused by 34 operating Howden wind turbines (James Howden and Company, Renfrew, Scotland) in 7 rows, totaling 11.22 megawatts (MW) of rated capacity during 2006–2007 in Vasco Caves Regional Preserve, California, USA, calculated from fatalities/MW of rated capacity/year and from fatalities/gigawatt-hour (GWh) generated during the study. We adjusted all estimates by novel scavenger removal trials intended to prevent scavenger swamping, and include lower and upper confidence limits (LCL and UCL, respectively) of 80% confidence intervals.

	Adjusted annual fatalities and 80% CI					
	Based on per-MW rates			Based on per-GWh rates		
Species	$\bar{x}$	LCL	UCL	$\bar{x}$	LCL	UCL
Red-tailed hawk	1.7	−0.5	4.0	0.8	−0.2	1.8
Ferruginous hawk	5.6	−1.6	12.9	5.5	−1.6	12.5
Barn owl	6.4	−1.9	14.7	4.3	−1.2	9.8
Burrowing owl	24.3	−0.5	49.1	29.5	−1.4	60.4
Rock pigeon	6.7	−2.0	15.5	8.2	−2.4	18.9
Cliff swallow	13.0	−5.2	31.2	6.8	−2.7	16.4
European starling	5.2	−2.1	12.4	3.7	−1.5	8.9
Western meadowlark	6.5	−2.6	15.6	5.9	−2.3	14.0
All raptors	38.1	−4.5	80.7	40.1	−4.4	84.6
All birds	69.5	−16.3	155.4	64.7	−13.4	142.9

fatalities. Scavengers likely carried some of these birds from the wind turbines to locations where we found dropped carcasses, consistent with the high scavenger removal rates we recorded. As additional evidence of scavenger carries, we found a white-tailed kite (*Elanus leucurus*) carcass on an animal trail and multiple other carcasses under trees, a fence post, and under rock overhangs, all places where vertebrate scavengers would likely bring food. However, we still do not know what proportion of incidental carcasses represented background mortality, crippling bias, or scavenger removal from wind turbines.

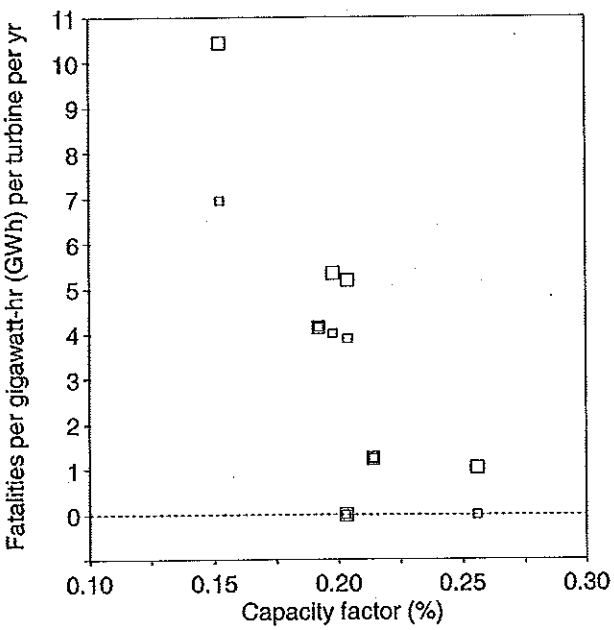

Figure 3. Fatality rates of raptors (small squares) and all birds (large squares) decreased with increasing capacity factor of all operable wind turbines in the turbine row during 2006–2007 in Vasco Caves Regional Preserve, California, USA. Note that these capacity factors were larger than annual capacity factors, because they were based on 2 summers, a season of peak power generation. The Howden turbines (James Howden and Company, Renfrew, Scotland) in our study achieved a capacity factor of 11.8% in 2006.

Camera traps revealed the vertebrate scavenger guild in our study area, including coyote (*Canis latrans*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), common raven (*Corvus corax*), red-tailed hawk, and great horned owl (*Bubo virginianus*). Other species visiting carcasses included American badger (*Taxidea taxus*), turkey vulture (*Cathartes aura*), and California ground squirrel (*Spermophilus beecheyi*). Cameras revealed a coyote urinating on a red-tailed hawk carcass 2 days after placement and scent-rolling on it 3 other times; this carcass was not removed until 31 days, suggesting that mammalian carnivores might sometimes use large raptor carcasses as territory markers. Cameras also photographed a coyote swallowing a California quail (*Callipepla californica*) whole, coyotes and common ravens removing carcasses without leaving a trace, and on-site feeding on carcasses resulting in carcass parts remaining to the end of the trial. We also saw photos of potential scavengers (i.e., coyotes, American badgers, and a California ground squirrel) staring at the camera, including at 3 carcasses not removed by trial's end, suggesting that camera traps might sometimes discourage mammalian scavengers from removing carcasses. (Other scavenger trials have used flags or other carcass markers, which might have the same effect.)

The Reconyx cameras sometimes failed to record scavenger visits and carcass removals due to battery failures, incorrect time stamps on CF memory cards, and unsuitable sensitivity levels (n = 5). Missed recordings might have resulted from scavengers removing carcasses between photos or during the camera-recovery phase, from cameras firing until memory cards filled or batteries depleted due to vegetation movement in high winds or due to reflected sunlight or ambient heat flooding trigger sensors. Nevertheless, set up to avoid these problems, event-triggered camera traps offer researchers more informative means to perform scavenger removal trials for generating more accurate fatality rate estimates at wind resource areas worldwide.

MANAGEMENT IMPLICATIONS

Many estimates of scavenger removal rates prior to our study were likely biased low due to scavenger swamping, so

Table 5. Estimates of wind-turbine–caused fatality rates adjusted by conventional scavenger removal trials conducted across the United States (Smallwood 2007) and new trials intended to prevent scavenger swamping during 2006–2007 in Vasco Caves Regional Preserve, California, USA. Estimates were from 54 operating wind turbines in 11 rows, totaling 12.52 megawatts of rated capacity.

Species	Adjusted fatality rate (deaths/megawatt/yr)				Fatality rate change (%) from old to new scavenging rates
	Old scavenging rates		New scavenging rates		
	$\bar{x}$	SE	$\bar{x}$	SE	
Red-tailed hawk	0.367	0.333	1.072	0.976	+192
Ferruginous hawk	0.111	0.111	0.324	0.326	+192
Barn owl	0.337	0.217	0.984	0.802	+192
Burrowing owl	1.445	0.710	1.411	1.147	−2
Rock pigeon	0.225	0.163	0.388	0.393	+73
Cliff swallow	0.459	0.487	0.757	0.828	+65
European starling	0.872	0.760	1.437	1.309	+65
Western meadowlark	0.230	0.244	0.379	0.414	+65
White-throated swift	0.688	0.730	1.135	1.240	+65
All raptors	2.259	2.097	3.791	3.252	+68
All birds	4.733	5.742	7.886	7.436	+67

managers should reconsider earlier estimates at wind farms throughout the United States and should pursue additional trials that limit carcass placement to more realistically simulate deposition rates from wind turbines and that place carcasses of small birds instead of larger surrogate species. Previously reported estimates of avian fatality rates in the APWRA and elsewhere should be adjusted upwards. Given that >50% of all summer-placed bird carcasses were removed in <10 days, fatality search intervals should be ≤14 days. Also, we found that fatalities/GWh increased at wind turbines with lower capacity factors, indicating that fatalities might be lessened by relocating less efficient turbines to sites where they will operate more often or by repowering them with modern, more efficient turbines. Power output data should be routinely provided to fatality monitors at wind resource areas.

ACKNOWLEDGMENTS

Our project was funded by the Public Interest Energy Research Program administered by the California Energy Commission (CEC) and the East Bay Regional Park District. We thank L. Spiegel (CEC) and J. Rasmussen (EBRPD) for administrative support. J. Rivera was the caretaker of Vasco Caves Regional Preserve and helped the study in many ways. We also thank B. Karas, H. Snively, J. Barclay, and L. Harmon for data collection, L. Neher for GIS support, and B. Walton, P. Peeters, and H. Peeters for helping to get the project started. We also thank Lindsay Wildlife Hospital, University of California at Davis Raptor Center, Sulphur Creek Nature Center, and the Vertebrate Museum of California State University, Sacramento for providing bird carcasses, and we thank M. Taylor, EBRPD Park Supervisor, of Hayward Regional Shoreline for allowing us to store carcasses. G. Hardie and Babcock and Brown Group provided wind turbine power output data, which we appreciate. We thank L. Hall, A. J. Krzysik, A. Palleroni, J. Linthecum, and G. Hunt for providing review comments on an agency report that preceded this paper. We also thank Associate Editor L. Brennan and 2 anonymous reviewers for helpful comments.

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Appendix. Predicted percentages of cumulative carcasses remaining within search areas of wind turbines, based on volitionally placed carcasses at random locations and at intervals intended to prevent scavenger swamping during 2006–2007 in Vasco Caves Regional Preserve, California, USA. We converted all predicted values <0 to 0 and all values >1 to 1, and we presented predictions daily through 30 days and every third day thereafter to 90 days. All predictions were from Table 1.

	Predicted carcasses remaining (%)								
	Placed in winter			Placed in summer			Placed all seasons		
Days since trial start	Small birds	Medium and large raptors	All bird species	Small birds	Medium and large raptors	All bird species	Small birds	Medium and large raptors	All bird species
1	1.000	1.000	1.000	0.642	0.623	0.616	0.736	0.753	0.727
2	1.000	1.000	0.996	0.567	0.553	0.538	0.666	0.709	0.678
3	1.000	1.000	0.981	0.514	0.506	0.487	0.615	0.680	0.642
4	1.000	1.000	0.967	0.474	0.472	0.449	0.575	0.659	0.613
5	0.993	1.000	0.953	0.442	0.446	0.421	0.543	0.643	0.589
6	0.984	1.000	0.941	0.415	0.425	0.398	0.516	0.631	0.568
7	0.972	1.000	0.929	0.393	0.408	0.379	0.493	0.620	0.551
8	0.959	1.000	0.919	0.374	0.394	0.364	0.474	0.611	0.535
9	0.945	1.000	0.910	0.357	0.382	0.350	0.456	0.604	0.522
10	0.931	1.000	0.901	0.342	0.372	0.339	0.441	0.597	0.509
11	0.916	1.000	0.893	0.329	0.362	0.329	0.427	0.592	0.498
12	0.901	1.000	0.886	0.318	0.354	0.320	0.414	0.587	0.488
13	0.886	1.000	0.879	0.307	0.347	0.312	0.403	0.582	0.478
14	0.871	1.000	0.872	0.297	0.341	0.305	0.392	0.578	0.470
15	0.855	1.000	0.866	0.289	0.335	0.299	0.383	0.575	0.462
16	0.840	1.000	0.860	0.280	0.330	0.293	0.374	0.572	0.454
17	0.824	1.000	0.855	0.273	0.325	0.287	0.366	0.569	0.447
18	0.808	1.000	0.850	0.266	0.321	0.283	0.358	0.566	0.440
19	0.792	1.000	0.845	0.259	0.317	0.278	0.351	0.563	0.434
20	0.776	1.000	0.840	0.253	0.313	0.274	0.344	0.561	0.428
21	0.760	1.000	0.836	0.248	0.309	0.270	0.338	0.559	0.423
22	0.744	1.000	0.831	0.242	0.306	0.267	0.332	0.557	0.417
23	0.728	1.000	0.827	0.237	0.303	0.263	0.326	0.555	0.412
24	0.712	1.000	0.823	0.233	0.300	0.260	0.320	0.553	0.408
25	0.696	1.000	0.820	0.228	0.297	0.257	0.315	0.552	0.403
26	0.680	1.000	0.816	0.224	0.295	0.254	0.310	0.550	0.399
27	0.664	1.000	0.812	0.220	0.293	0.252	0.306	0.549	0.395
28	0.647	1.000	0.809	0.216	0.290	0.249	0.301	0.547	0.391
29	0.631	1.000	0.806	0.212	0.288	0.247	0.297	0.546	0.387
30	0.615	1.000	0.802	0.209	0.286	0.245	0.293	0.545	0.383
33	0.566	0.800	0.793	0.199	0.281	0.239	0.282	0.541	0.373
36	0.519	0.800	0.785	0.191	0.276	0.234	0.272	0.539	0.363
39	0.479	0.800	0.778	0.183	0.272	0.229	0.263	0.536	0.355
42	0.445	0.800	0.771	0.176	0.268	0.225	0.255	0.534	0.347
45	0.416	0.800	0.764	0.170	0.265	0.222	0.247	0.532	0.340
48	0.390	0.800	0.758	0.164	0.262	0.218	0.241	0.530	0.334
51	0.367	0.800	0.752	0.159	0.260	0.215	0.235	0.528	0.328
54	0.346	0.800	0.747	0.155	0.257	0.213	0.229	0.527	0.322
57	0.328	0.800	0.742	0.150	0.255	0.210	0.223	0.526	0.317
60	0.312	0.800	0.737	0.146	0.253	0.208	0.219	0.524	0.312
63	0.297	0.800	0.733	0.142	0.251	0.206	0.214	0.523	0.307
66	0.283	0.800	0.728	0.139	0.250	0.204	0.210	0.522	0.303
69	0.271	0.800	0.724	0.136	0.248	0.203	0.205	0.521	0.299
72	0.260	0.800	0.720	0.133	0.247	0.201	0.202	0.520	0.295
75	0.249	0.800	0.716	0.130	0.245	0.200	0.198	0.519	0.291
78	0.240	0.800	0.713	0.127	0.244	0.198	0.194	0.519	0.288
81	0.231	0.800	0.709	0.124	0.243	0.197	0.191	0.518	0.284
84	0.223	0.800	0.706	0.122	0.242	0.196	0.188	0.517	0.281
87	0.215	0.800	0.703	0.120	0.241	0.194	0.185	0.517	0.278
90	0.208	0.800	0.700	0.117	0.240	0.193	0.182	0.516	0.275