

Photo taken June 16, 2010
Peter Cornelison, Hood River
peterc@gorge.net

Comments for WA EFSEC hearing on
Whistling Ridge Energy Project,
Stevenson, WA 6/17/2010
WR - DEIS
Public Comment #200

1. Please hold another hearing, give us more than 3 WEEKS to analyze 1500 pages of technical material.

2. Typical Cloud Line - Proposed Whistling Ridge turbine string will be in cloud/fog for part of the year.
This is not covered in the EIS.

**3. For Hood River WR =
major Visual IMPACT.
Not the scenic view our
multi-million \$ tourist
industry thrives on, or a
view envisioned by the
National Scenic Act
Drafters**



WR - DEIS
Public Comment #201

Dan Spatz mailing address: po Box [REDACTED]
White Salmon, WA 98672
E-mail: [REDACTED]@charter.net

Good evening, and thank you for this opportunity to comment. My name is Dan Spatz, and I reside at 2506 Jordan Street, The Dalles, Oregon. I've lived in the Columbia Gorge since 1967. Although I hold certain official capacities, I'm speaking tonight solely as a private individual. I'm a landowner and taxpayer in The Dalles and also in the Snowden area of Klickitat County, where my property – the place where I grew up -- has a view looking toward the Whistling Ridge project location.

I'm here to speak in favor of this project, for two reasons:

- 1) Global climate change is a reality, and renewable energy is part of the solution. As a society, we want to have our cake and eat it too: we want to reduce our carbon footprint, but we often oppose new sources of energy necessary to achieve that goal. We cannot conserve our way out of the climate change crisis. If we are to maintain our current standard of living, we will need radically different alternatives to fossil fuels on a grand scale, whether this means nuclear power, wind, solar, geothermal, tidal, wave energy, or most likely a combination of all of the above in concert with energy-efficient design. As we build out wind energy in more remote locations, we will inevitably face the need to develop wind power closer to places where people already live. While some may object to the visual appearance of wind turbines, I submit that these are far more attractive than strip-mining coal and tar shales, and drilling for deep-water oil in places like the Gulf of Mexico or Arctic National Wildlife Refuge. Wind energy is clean energy, and for that reason alone we should welcome the project before us.
- 2) I object to the contention that proximity to the Columbia Gorge National Scenic Area should prove a barrier to this project. The project is located outside the national scenic area boundary. The intent of Congress in drafting the scenic area legislation in 1986 was to enhance environmental protection and economic development within the Columbia Gorge. While we still face the need to precisely define certain scenic area boundaries and achieve a necessary mechanism for modifying those boundaries over time, it is very clear that the intent of Congress was not to restrict developments proposed outside the current scenic area boundary. This principle has already been demonstrated in Klickitat and Sherman counties, where wind farms are already visible from within the national scenic area, and the precedent so established should also apply elsewhere in regions adjoining but not included within the national scenic area proper. Yes, there will be some visual impact. But in keeping with my first point, as a society we cannot have our cake and eat it, too. Wind turbines or Gulf Coast oil spills? Not to over-simplify our options, but as a society we will be asked to make precisely this same choice many times, in many places, in the long decades ahead as we confront the global climate change crisis. We might as well face reality now. I vote for wind turbines.

I WAS IN SPAIN IN 2008 AND SAW MANY WINDFARMS-
-I FOUND THEIR MOVEMENT ENCHANTING AND A
THING OF BEAUTY.

AMERICA IS A GREAT COUNTRY--AND A FORTUNATE
ONE, BUT WE ARE AT A CROSSROADS REGARDING
FUTURE ENERGY SOURCES.

I AM GLAD TO SEE SKAMANIA COUNTY TAKING A
LEADERSHIP ROLE IN WIND POWER AND THE GREEN
TECHNOLOGIES OF THE FUTURE.

SOMEDAY, FUTURE SKAMANIAN WILL LOOK BACK IN
PRIDE AND SAY WE WERE AMONG THE FIRST TO
RECOGNIZE THE NEW ENERGY WORLD, PUT ASIDE
OUR PERSONAL DIFFERENCES, AND WENT WITH WHAT
IS BEST FOR THE GREATER GOOD.

THANK YOU

Harold L. Gailey
HAROLD L. GAILEY
PO BOX 

STEVENSON, WA 98648

6/17/10

I wish to state my support for the Whistling Ridge Energy Project. This project will help reach the goal mandated by the voters of our state to make renewable energy a greater part of the state's energy consumption. It will help Skamania County continue to provide the services that we, the residents, demand and expect. It will also provide some much needed, high-paying stable employment opportunities for residents of the Columbia River Gorge.

I believe that we must, as citizens of this planet, accept our responsibility to find ways to utilize clean, renewable resources to meet our energy demands. As a nation we may have to make some sacrifices that will enable us to exploit the renewable energy resources that are available to us. We can no longer expect the rest of the world to provide us with cheap energy. We can no longer accept the damages to our planet caused by continued use of fossil fuels. We must move forward to develop new technologies that reduce our impact on the environment.

In my view, the potential benefits of this project outweigh any detrimental impact on the region.

John Hardham

Underwood resident

Small business owner (Light Wave Communications) located in Underwood

Member, Skamania County Economic Development Commission

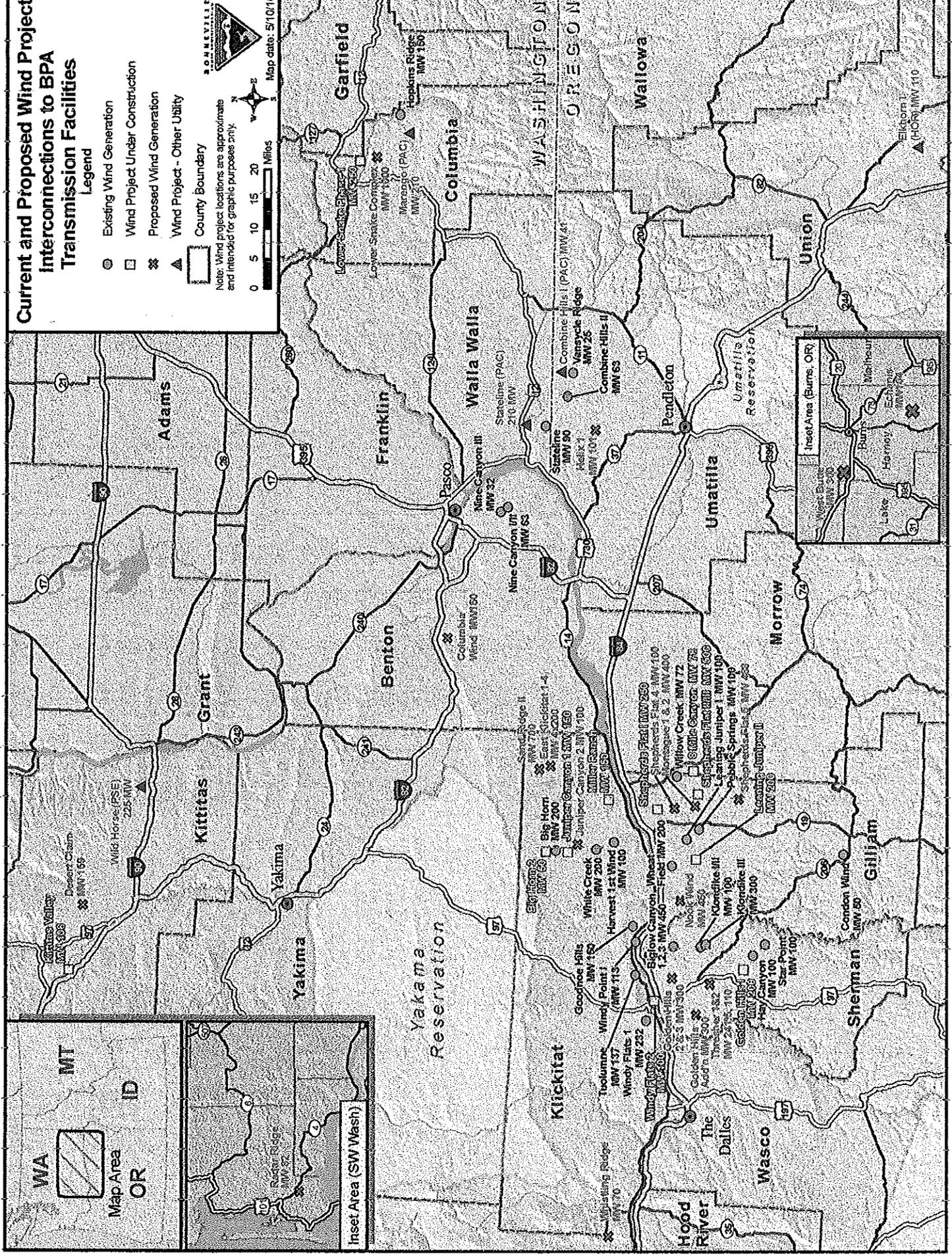
Commissioner, Skamania Fire Protection District 3 (Underwood Volunteer Fire Dept.)

Current and Proposed Wind Project Interconnections to BPA Transmission Facilities

Legend

- ⊙ Existing Wind Generation
- Wind Project Under Construction
- ⊗ Proposed Wind Generation
- ▲ Wind Project - Other Utility
- ▭ County Boundary

Note: Wind project locations are approximate and intended for graphic purposes only.



WA MT
OR ID
Map Area

Inset Area (SW Wash)



Washington State Energy Facility Site Evaluation Council
COMMENT FORM

Whistling Ridge Draft Environmental Impact Statement
Public Hearing and Comment Opportunity

Name: JON OHLSON

Address: SCHOOL HOUSE RD. UNDERWOOD, WA 98651

(Please include your Zip!)

Email Address: @EMBARQMAIL.COM

Add me to the Mailing list/Email list

Please write any comments you have with respect to the

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

Comment letters must be postmarked by Monday, July 19, 2010.

I SUPPORT THE WHISTLING RIDGE WIND PROJECT. RENEWABLE ENERGY HAS STRONG FOUNDATION IN AMERICAS FUTURE ENERGY NEEDS. NEVER MORE SO THAN TODAY CONSIDERING OUR FOSSIL FUEL CRISIS IN THE GULF & OVER SEAS. OPPOSITION TO THIS PROJECT FROM VARIOUS GROUPS ON THE GROUNDS OF IMPACT TO THE SCENIC AREA IS REDICULOUS. IT IS LOCATED OUTSIDE CO. G.S.A BOUNDARY LINES AND THEY HAVE NO RIGHT TO DICTATE LAND USE ON PRIVATE PROPERTY. WE NEED THE ECONOMIC BOOST THIS PROJECT WILL PROVIDE FOR SKAMANIA CNTY. - JOBS/SCHOOLS/TOURISM

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

For more information about EFSEC's review of these project changes, please contact:
Stephen Posner, Compliance Manager, PO Box 43172, Olympia, WA 98504-3172,
call (360) 956-2063, or e-mail efsec@cted.wa.gov.

Comments

Whistling Ridge Energy Project

Washington Energy Siting Council (EFSEC)

Bonneville Power Administration (BPA)

Frank Backus

██████ Hwy 141

White Salmon, Wash. 98672

1. I am in favor of this wind project.
2. Environmental Impact Statement found no significant negative Impacts that would preclude the development of this wind project. Not fauna, flora nor scenic impacts.
3. This project is outside the boundary of the National Scenic Area.
4. Washington Voter have spoken, utilities are required to provide renewable energy to their customers. Here it is!!!
5. This project is compatible with the forestry zone of the surrounding property and it is compatible with the neighboring lands that are zoned agriculture.
6. This project will have a major role in securing the economic stability of Skamania County and of the SDS family of companies.

Frank Backus



Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Whistling Ridge Draft Environmental Impact Statement

Public Hearing and Comment Opportunity

Name: Laurie Balmuth

Address: Box [REDACTED] Hood River 97031

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

Add me to the Mailing list/Email list

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Wind power is important however every possible location is not the right location for windmills. Every windy ridge is not the right place for a wind farm. It is not necessary to put this wind power development in. There are too many people and livestock and wildlife in this area. The impact to the Scenic Area is too great. We may need more energy from sources other than oil. We may need to do more research on conservation. However THIS wind farm is not crucial to solving the energy crisis. The harm to the scenic area and local residents is too great.

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call (360) 956-2063, or e-mail efsec@cted.wa.gov.

Jeff Teague? WPTW

WR - DEIS
Public Comment #208

1. Whistling Ridge comments, Stevenson, 6-17-10

2.

3.

4.

I am opposed to this project as the writer

It is hard for me to believe that the parties responsible for drafting this DEIS can be objective and impartial for this proposal. EFSEC is an agency known for siting energy facilities and the BPA is an agency which deals with power generation and distribution of that power. Nothing personal, ~~it is a business~~ It is your duty to be objective.

2. This DEIS is insufficient in that an appropriate EIS has a list of alternatives. This one only lists one action item and mentions several times throughout the document that it is one of the alternatives. How can the proposed action also be an alternative? The only alternative stated is the No Action Alternative. The applicant says that he cannot go below 70mW and is trying to disguise his unwillingness to minimize this project by saying that public utilities seeking to fulfill their RPS requirements need a minimum of this kind of output "...to be attractive." In one area it states that this project has to be defined as an "integrated whole" to be worthwhile yet in ^{the} design/mitigation measure ~~the~~ under Biological Resources that "Micrositing of turbines and associated facilities would allow any sensitive resources discovered during construction to be avoided." You can't have it both ways.

3. Pg. 1-7 states that "No other federal agencies have been identified as cooperating agencies for this EIS at this time." Cooperating, hmmm, is that because the NPS and FS have made concerned negative comments about this proposal as it now is written. Also, why have the Yakama Nation not been involved in the DEIS when they, as a sovereign nation, have legitimate cultural resource concerns. Any EIS is required to ensure that there are no impacts to cultural resources. On page 1-8 it states that "Other federal, state or local agencies also may have permitting or other approval authority for the proposed Whistling Ridge Energy Program. Those agencies may use this EIS in order to fulfill NEPA or SEPA responsibilities." Those agencies have an obligation to the public to do their own due diligence and evaluations, not depend on the project proponent's potentially biased data.

4. This DEIS states that the BPA substation would cover "4.25 acres and be sufficient for future installation of equipment if required for future development." What kind of future development---50 more wind turbines? I am concerned with scope creep. With the national and state mandates on "going green" I can see how once they are in, it would be much easier to expand the number of turbines. I don't want to see this project look like the ~~Goldendale~~ Klickitat projects,

5. People come from all over the world to enjoy the majestic natural vistas the CRG has to offer, not man made ones. I don't think very many people would like to see wind turbines at Yosemite, Yellowstone or the Grand Canyon. Neither should they at this National Scenic Area, one of only 2 in the whole United States of America.

6. This EIS is whoefully insufficient in its evaluations of wildlife. It does a poor job of covering bat evaluations, lacks significant bird/bat dispersal data and has no mention of large animal. It is so bold as to state, "For potential iimpacts to big game species(deer and elk), coordination with WDFW will occur IF APPROPRIATE. It is a know wintering ground for Elk. Also what about cougar, bobcat, coyotes and all the other ~~so call~~ big game? It states that it will "Convene a Technical Advisory Committee to evaluate mitigation and monitoring programs for ~~for~~ impacts to wildlife and habitat----why is this not already in place?

This project is proposed at a right time in our local and national energy needs but placed in the wrong place. The space Needle is around 605ft. tall, these turbines could all be 426 ft. high. There is no way this project could be defined as "visually subordinate." If I want to see the Space needle, which also has a red light on top, I will go to Seattle. I don't want to see 50 space needles from ~~inside the national scenic area.~~

KVAS in the CRG.

Thank you.

PAUL Smith
[REDACTED] Mabee Mines Road
Washougal, WA 98671
260-837-[REDACTED]
email: [REDACTED]@pacifiac.com



Washington State Energy Facility Site Evaluation Council
COMMENT FORM

Whistling Ridge Draft Environmental Impact Statement
Public Hearing and Comment Opportunity

Name: MARY A. ALVORSON

Address: WINTER CR Rd STEVENSON WA 98448

(Please include your Zip!)

Email Address: [REDACTED]@hotmail.com



Add me to the Mailing list/Email list

Please write any comments you have with respect to the

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

Comment letters must be postmarked by Monday, July 19, 2010.

WHAT GUARANTEE DO YOU GIVE THAT LOCAL PEOPLE

WILL BE HIRED FOR BOTH CONSTRUCTION AND EMPLOYMENT?

~~STEP LANSIDES. RE: W~~

THIS WOULD NOT BE 1ST COMPANY TO COME HERE AND PROMISE

JOBBS - THEN NOT BE ABLE TO BUILD OR NO PERMITS ARE ISSUED.

.DO YOU HAVE PERMITS?

NEXT MEETING PEOPLE OUTSIDE OF THE AREA SHOULD NOT BE ABLE

TO HAVE AN OPINION OR COMMENT ON WHAT HAPPENS IN OUR AREA!

AS WASHOUGAL OVER TIME LIMIT NMAN. OR PORTLAND. OR HOOA RIVER!

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

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call (360) 956-2063, or e-mail efsec@cted.wa.gov.

AS THERE IS BIG GAME THERE - WILL HUNTING STILL BE ALLOWED - MY HUSBAND WOULD LIKE TO KNOW?

FRIENDS OF THE GORGE HAS WAY TOO MUCH TIME ON THEIR HANDS
WIND MILLS HAVE IMPACT ON VIEWS - WHAT ABOUT ^{WHITE} SALMON AND THE
LARGE HOMES ON CLIFFS.

BIRDS MORTALITY! LETS CLOSE THE AIRPORT IN PORTLAND.

Why does Portland get to decide what goes in the gorge because it ruins their view, when we see only lights across the river?

And why should windows in a tunnel come before much needed jobs? THIS WAS A PLAN UP THE RIVER.

IF THERE IS ANOTHER MEETING IT SHOULD BE PEOPLE OF SIERAMIA COUNTY PEOPLE ONLY AS THEY ARE THE ONES IMPACTED.

June 17, 2010

■ Thuja Narrow
Washougal, Washington 98671-7406

Washington Energy Facility Site Evaluation Council
905 Plum Street SE
Olympia, Washington, 98504-3172

Re: Whistling Ridge Energy Project May 2010 Draft Environmental Impact Statement

Members of the Council,

The horrifying, large-scale oil contamination event in the Gulf has increased the pressure to develop viable, alternative sources of energy. Wind-generated power, popularly advertised as being “clean” or “green,” is, however, not without drawbacks. The in-toto, as well as individual problems associated with wind turbines and large turbine arrays may, under certain circumstances and, ^{at particular} locations, outweigh their benefits.

Regardless of opinion regarding this proposed project, there must be unbiased, objective documents that permit the public access to information and to guide decision-makers to their tasks as well. The inattention to detail, lack of thoroughness, and to the appearance of fairness is very discouraging to see, especially in print. This EIS was created, with time to spare, compared to the time we have been allotted to review it and to prepare comment.

1. During a brief review of the referenced document, I was startled to note the appearance throughout, of a distinct bias. Right off the bat, in section 1.2.3.3, a discourse of almost a full page of text – five paragraphs worth – is entitled “Business Needs of the Applicant.” No-one’s “business need” is appropriate material for discussion in any EIS document, for what, I hope, are obvious reasons. (Only in a totalitarian regime is the “need” or desire of an individual more important than large-scale human, wildlife and scenic resources.) The only material in this section that is relevant- that dealing with the large number of temporary construction jobs that would result, and the small number of permanent jobs after project completion belongs elsewhere.

2. In view of the fact that no studies have been conducted in the US that determine what effect wind turbines have upon forest-dwelling species of wildlife, it is inappropriate and misleading to repeatedly state that ‘No impacts are anticipated....’ Frequent statements of conclusion appear throughout the document; some are nebulous, speculative, inaccurate or contradict the material provided in the previous text or appendices and add to the appearance of bias.

On page 3-77, it is confidently stated that "Operation of the project would result in no further impacts to habitats on the project site" despite a statement on Page 3-81 that "Because data on impacts to big game as a result of wind project operations is limited, it is difficult to predict the impact of the proposed project on wildlife using priority habitats on the proposed project site." ("Additional coordination with WDFW is ongoing, and would continue to address this resource.")

3. Almost all the mitigation measure introductory statements end with the phrase "...to the extent feasible." It is not always specifically stated who ultimately determines what is "the extent feasible." The appropriate responsible agency, entity or statute should be provided in the text, in the relevant paragraph, so that it can be more easily evaluated. This lack of clarity regarding responsible parties is also seen in Section 3.4.3 "Mitigation Measures"; it also resorts to "the extent feasible" phrase apparently with no one in mind.

4. More research data on human health in connection with wind turbine arrays is available than has ever been in the past, from both Europe and the United States. Unfortunately, it has not been common knowledge and therefore has not been reflected in public policy regulations. There has been testimony dealing with this subject in detail and this body of yet unrecognized information should be a major determinant in wind farm siting decisions. Please acquaint yourselves with the data before moving ahead.

5. The geologic and soils information is troubling even when one has seen the steep hillsides that this project proposes to disturb. Construction will require blasting, which can destabilize fragile habitats, and unpredictable effects may result over large periods of time. The soil types present at or immediately adjacent to the construction sites are not stable and the planned mitigation measures which aim to control erosion and slides may be difficult, if not impossible to achieve, as can be already seen at numerous locations in this portion of the county. Although downplayed in the EIS, significant erosion events will surely degrade water quality and ^{erect} ~~erect~~ downstream fisheries or will ^{erect} ~~erect~~ local aquatic invertebrate populations.

6. The Scenic Area impacts have been discussed by many already. It would be more than unfortunate to allow all of the effort that has so far been expended to maintain the unoccluded foothill views within the designated area to be despoiled by a project of this magnitude, even though it ^{may be} ~~is~~ located just outside of the Scenic Area. To many, especially in these times, aesthetic values are worth advocating for.

7. The Columbia River flyway could be considered a cultural resource for the avian species. It has likely existed for a longer time than humans have been here and constitutes a known route for both north-south and east-west migrating birds. It is inconceivable that a project that is known to kill birds could be approved for an area located ^{with} ~~in~~ the flyway.

Larger turbine blades and consequent slower rotation speeds have been reported to minimize bird fatalities, but the fact that Columbia River is the major western flyway in the United States negates this improvement since denser concentrations of birds would be present during migration flights. The rotation speeds mentioned in the document stipulated a wide range and was indicative that the authors were not aware that rotation speed guidelines purporting to offer some protection from bird strikes are available.

8. Although a two-year bird mortality monitoring study after construction is mentioned, no concern for documenting bat mortality is evidenced as no provisions for such are listed on Page 3-82, Section 3.4.82 under Mitigation Measures. This, despite the possibility that two federal bat Species of Concern, Townsend's big-eared bat and Keen's myotis, are reported to "likely occur in the project area." The bat echolocation studies that were conducted at the project site were unable to determine bat species, but stated that "we expect that the potential risk to bats from turbine operations to be somewhat higher than the rates observed at other western facilities placed in non-forested environments. One estimate from Buffalo Ridge, Minnesota data sets predicted a mortality range from 2.2 to 20.8 individuals per year which, over time, certainly could have an impact upon a species of concern's breeding population numbers. The bat echolocation study consultants, Western EchoSystems Technology, Inc., recommended that "The post-construction monitoring program should be designed to accurately estimate the level of bat mortality." Why is it not included?

9. There is no mention of the requirement for providing alternative power sources for specific megawatt-production wind facilities. These are usually natural gas facilities. In what nearby communities would these be built? They should also be considered part of the cost of a wind facility.

10. I have never seen an EIS, especially for a project of this scope that has no other action alternatives. Although they are mentioned in the text, they must be dealt with as real possibilities, regardless of the fact that the proponent does not wish to spend the additional funds it is claimed they would require.

I plan to submit a lengthier statement dealing with additional issues by the July deadline. Thank you for the opportunity to comment, if only in a cursory manner. I realize that it would take a great deal of your time, but it would be wonderful if a more generous amount of time were allotted to speak, especially on an issue with so many facets of concern.

Sincerely,

Sallie Tucker Jones

Mary J. Repar
██████ E. Loop Rd., ██████
Stevenson, WA 98648
Tel: 509.427.██████

17 June 2010

EFSEC
905 Plum Street SE
Olympia, WA 98504-3172
e-mail: efsec@commerce.wa.gov

BPA
Public Affairs Office – DKE -7
P.O. Box 14428
Portland, OR 97293-4428
Toll-free comment line: 800.622.4519
FAX: 503.230.3285
503.230.4145
www.bpa.gov/comment

Re: Preliminary Comments and Questions on the Whistling Ridge Energy
Project Draft Environmental Impact Statement: Cumulative Impacts,
Carrying Capacity, Energy Production, *Economic Analysis*

Dear EFSEC and BPA,

These are my preliminary comments and questions. I will be making further
comments during the public comment period.

Let me be blunt: in reading the Cumulative Impact Analysis section in the DEIS,
3.14, p. 3-264, I was perturbed to find that there have not been any cumulative impact
analyses done. There are statements made about cumulative impacts but no analyses.
**The basic refrain appears to be that, in the past, bad environmental things
happened in the project area, bad things will happen in the present because of the
project, and this will lead to more bad things happening in the future!** This is not
cumulative impact analysis.

The NEPA process must use critical analyses for Federal projects and this one
qualifies because of BPA's interest. The **Council on Environmental Quality's
Considering Cumulative Effects: Under the National Environmental Policy Act**
Handbook gives pretty clear methods on analyzing cumulative effects. Table 5.3, p. 56,
Primary and special methods for analyzing cumulative effects, gives seven primary
methods and four special methods for analyzing cumulative effects. (I submit the
Handbook into the record.) For example, what I did not see in the DEIS was a Trends
Analysis, which is #6, in Table 5.3 of the CEQ Handbook—"Trends analysis assesses the
status of a resource, ecosystem, and human community over time and usually results in a
graphical projection of past or future conditions. **Changes in the occurrence or
intensity of stressors over the same period can also be determined. Trends can help
the analyst identify cumulative effects problems, establish appropriate**

environmental baselines, or project future cumulative effects. I saw no environmental baselines data in the DEIS. Where is it? With out baseline data, cumulative impacts/effects are very hard to quantify.

Another example, #5, Modeling, under Primary Methods, states “Modeling is a powerful technique for quantifying the cause-and-effect relationships leading to cumulative effects, can take the form of mathematical equations describing cumulative processes such as soil erosion, or may constitute an expert system that computes the effect of various project scenarios base on a program of logical decisions.” The strengths of this method are: it “can give unequivocal results; addresses cause-effect relationships; quantification; can integrate time and space.” Weaknesses are: “need a lot of data, can be expensive, intractable with many interactions.”

Just two examples, and there are many more, from the DEIS, I believe, show its inadequacy, especially in cumulative impacts analysis:

In 3.14.3.4, Vegetation and Wetlands, p. 3-272, the proponent states: “Past and present land development, timber harvest, and agricultural uses have resulted in a **cumulatively significant change** in the composition of vegetation and habitat types in the project vicinity. In general, land development and agricultural uses have resulted in conversion of forested areas to non-forested areas, and timber harvests have resulted in a mosaic of forest ages, with average stand age declining over time from relatively short stand rotations. Changes in stand structure and complexity, patch size, and species distribution also have occurred. Few large, old-growth conifers or late-successional stands exist [**my questions: how many, where are they located, is there a map, etc?**] in the general project vicinity. **Accordingly, past and present uses have resulted in cumulative habitat conversion and an ongoing pattern of habitat fragmentation. [my questions: how much fragmentation, what kind of fragmentation, affecting which species, etc.]** Reasonably foreseeable future actions, such as ongoing land development and timber harvests, **would continue this trend.**” [my emphasis] And, it goes on to say: “Project construction would take place in the context of the existing use of the project vicinity generally for commercial forestry, which includes regular cycles of clearcutting and reforestation. **Nonetheless, by removing trees and other vegetation in the wind project area for the life of the project, development of the Proposed Action would contribute incrementally, though in a relatively minor way, to these cumulative impacts.**” This is not a cumulative impact analysis, wherein all the past, present, and future habitat fragmentation would have to be quantified, and then a cumulative impact analysis done on the project area. And then this project would also have to look at habitat fragmentation in the geographical areas surrounding the project in order to get a total picture of all the habitat fragmentation. Cumulative impacts are not done on a project by project basis with no additive analyses. Regional cumulative impacts matter.

In the same section, p.3-273, Wetlands, the DEIS states: “Incremental losses and degradation of wetlands over time have cumulatively depleted [**my questions: how much, maps, species affected, etc.**] wetland resources in the United States. In the project

vicinity, wetlands likely were previously impacted by construction of a variety of activities, including development of roads and railroads, agricultural activities, and past timber harvests. **[my questions: what are the cumulative impacts on the wetlands from all this past and present activity? How will your project affect these cumulative impacts?]** Reasonably foreseeable future actions **may also affect** wetlands in the project vicinity, but it is expected that these future projects would be required to avoid, minimize, and compensate for any potential impacts to wetlands from filling or other activities as part of project Section 404 permitting requirements. Regardless, because **construction and operation of the proposed wind project would not impact wetlands, implementation of the Proposed Action would not contribute to cumulative impacts to wetlands.**” [my emphasis]

I’m sorry, we’re supposed to take their word for it that their project would not impact wetlands??? Where is the cumulative impact analysis of the wetlands in the area?

This is not cumulative impacts analysis. It is wishful thinking. And wishful thinking doesn’t get the project okayed. I will be submitting further comments on the cumulative impacts at a later date.

We have not even touched upon **Carrying Capacity Analysis**, which should be applied to a wide range of resources to address cumulative effects. From the CEQ Cumulative Effects handbook: “Cumulative effects are a more complex problem for whole ecosystems, because ecosystems are subject to the widest possible range of direct and indirect effects. Analyzing the cumulative effects on ecosystems requires a better understanding of the interworkings of ecological systems and a more holistic perspective. Specifically, ecosystem analysis entails new indicators of ecological conditions including landscape-scale measures. In addition to these two special methods, analyzing cumulative effects on human communities requires specific economic impact analysis and social impact analysis methods.” Where are the special economic impact analyses and social impact analyses for this project? Cumulative economic impacts don’t just mean the impacts to the local area. Cumulative economic impacts are and should be regional in nature and it is prudent to ask what the cumulative impacts of this wind farm will be on our region. Will the impacts be harmful or beneficial? No one can answer that because there is no in-depth analysis in the DEIS.

I also have some questions for BPA:

Questions for BPA:

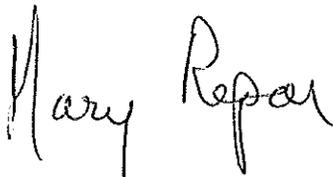
- 1) Even if there are multiple wind farms integrated into your system, do you have to operate the grid as if there were NO wind farms connected to the grid, since wind can be unpredictable and inconsistent?
- 2) If there is no wind and the dams cannot let water through because of other issues (i.e., fish protections), do you have to have backup natural gas plants to produce the added electricity that the wind turbines would be providing? (I am assuming that if the wind farms provide X amount of energy to the grid, BPA will sell X amount of energy to make more money, and the people to whom this X amount of

energy is sold would not be happy if they were not getting their X amount of energy, so if the wind is not blowing and the water is not flowing, the energy would have to come from somewhere, wouldn't it?)

- 3) Does BPA have any plans to build or partner in any natural gas plant projects?
- 4) How big would these natural gas plants have to be?
- 5) How is BPA going to back up the real and potential wind energy production from all of these wind farms?
- 6) Transmission lines:
 - Is BPA going to have to build more transmission lines?
 - Where would these lines have to be built, if they are needed?
 - What kind of lines would have to be built to accommodate all the increased wind energy production?

I would also like to submit the following articles into the record: "Swollen Columbia River churns so much electricity BPA is giving some away," by Ted Sickinger—BPA generating power 144 percent of normal Spring generation—so what to do with all this "extra" power, *The Oregonian*, June 11, 2010; and, "Birds vs. the wind farms," by Hal Bernton, *The Olympian*, June 08, 2010—"Based on that information, the wind power turbines currently operating in Oregon and Washington kill more than 6500 birds and more than 3000 bats annually."; and, "Increased Costs are Blowin' in the Wind," by Todd Wynn and Eric Low, *Cascade Commentary*, from Cascade Policy organization, February 17, 2010—"Wind energy on the Pacific Northwest's electricity grid has increased substantially. Often overlooked are the impacts of increasing wind generation on the reliability and affordability of electricity that very well might outweigh any of the promised environmental benefits."

Thank you for this opportunity to submit my comments. I will be making more comments on the entire DEIS at a future date.



Mary Repar

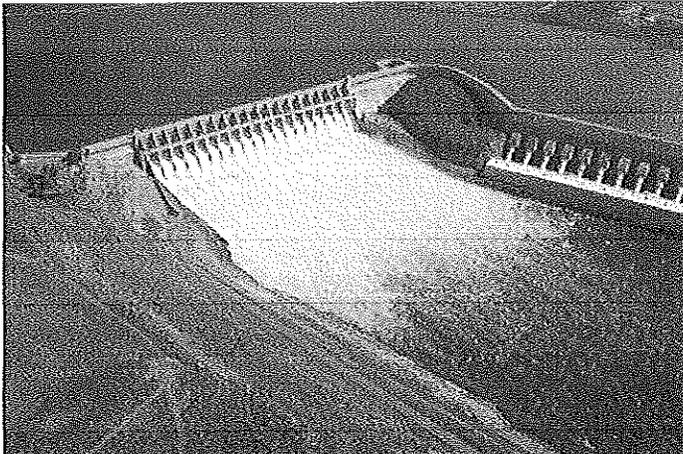


Swollen Columbia River churns so much electricity BPA is giving some away

Published: Friday, June 11, 2010, 7:32 PM Updated: Saturday, June 12, 2010, 8:08 AM



Ted Sickinger, The Oregonian



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Water shoots back up from the flow deflectors immediately below the spillway at Chief Joseph Dam in Washington. The deflectors help moderate oxygen levels to protect fish when river levels are unusually high.

Winter's snow drought has given way to a temporary flood of late spring runoff, forcing regional managers of the electrical grid to give away power, dial back generation at thermal plants and rapidly fill reservoirs to maintain acceptable conditions for migrating fish.

Robust water flows in the region's rivers are typically a blessing, creating a bounty for electricity generation, irrigation, fish passage and recreation. Indeed, only a month ago, the **Bonneville Power Administration** was issuing dire warnings about summer water shortages.

Those shortages are likely to materialize regardless, as rain now won't substitute for snowmelt in July and August. But early June's onslaught of moisture has temporarily pushed the Columbia River and its tributaries toward flood stage and taxed the hydro system's flexibility to manage competing interests.

The prevailing pineapple express has pushed precipitation levels to 700 percent of normal in some areas of the Snake River Basin and 170 to 200 percent of normal on the upper Willamette River, said Jim Barton, chief of water management in the Columbia Basin for the **U.S. Army Corps of Engineers**.

Too much rain means too much water over the dams' spillways, and the resulting turbulence leads to excess dissolved oxygen in the water. That's harmful to fish, so the big dam operators in the region -- the Corps and Bureau of Reclamation -- divert as much water as possible into reservoirs or through the dams turbines to generate electricity.

"All the reservoirs are filling or near full, so that makes it challenging," Barton said. "You can only store so much."

Then you generate.

"The more the dams can generate, the less they spill and the less issue with dissolved oxygen," Barton said.

When you create electricity, however, you need to use it, immediately, or risk an imbalance on the grid.

During the last few days, the 31 federally operated hydroelectric dams in the region have been running full tilt, generating an average of 13,000 megawatts of electricity. That's 144 percent of their normal spring generation -- the equivalent of adding four nuclear plants worth of electricity generation to the regional mix.

Complicating the picture is the region's growing fleet of wind turbines, which have been cranking out extra megawatts as the same storm cells dumping rain into the rivers have whipped wind speeds higher.

"You can only run the turbines as fast as you can find a home for the power," said Michael Milstein, a spokesman for the Bonneville Power Administration, which markets the power from the federal dams and one nuclear plant, and integrates the spikey output of the region's wind fleet onto the grid.

To accommodate the surge, the nuclear plant at Hanford has been dialed back to 25 percent of capacity, Milstein said. BPA has also warned wind farm operators that it won't be accepting much, if any, unscheduled power production.

Meanwhile, the agency has been enticing utilities to turn off their own power plants by giving away electricity for free, or near free, at several junctures since Wednesday.

"That's helpful to customers, as it flows through in lower power costs," said Steve Corson, a spokesman for Portland General Electric.

While the weekend weather is expected to be dry, it takes several days for a slug of moisture to move through the system.

"We expect things to be returning to normal by Monday," Milstein said. "It certainly has been a test of the system."

--Ted Sickinger

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[Back]

Published June 08, 2010

Birds vs. the wind farms

BY HAL BERNTON

SEATTLE - Biologist Orah Zamora spends her days walking around wind turbines in search of dead birds and bats. Most of her surveys turn up nothing, but every once in a while she finds a carcass that may have been felled by a whirring blade.

"It's like a crime scene, and you try to figure out what happened. Sometimes, it's really obvious because you see a slice mark," Zamora says.

Zamora's monitoring at the Windy Flats project near Goldendale is part of a larger series of surveys to assess how the wind-power boom is impacting birds that must now share air space with the towering turbines.

The surveys, which are financed by the wind industry, indicate that wind power is a relatively minor hazard to birds. But some scientists say it is still too soon to discount the risks posed by the rush to develop Northwest wind power. They are particularly concerned with the plight of hawks, eagles and other raptors, which are large, longlived birds at the top of the food chain.

One survey at Big Horn Wind Farm in Klickitat County estimated that more than 30 raptors were killed during an initial year of operations – more than seven times the number forecast in a pre-construction study. The dead raptors included kestrels, red-tailed hawks, shorteared owls and a ferruginous hawk, which Washington state lists as a threatened species.

"It's just too early to say what this all means," said K. Shawn Smallwood, a California ecologist who has published numerous scientific articles on wind farms and raptor deaths. "The science is just not there yet."

There also is uncertainty about how raptors react to wind-power development, which often carves up foraging grounds with miles of new roads. Some say more studies are needed to determine if some species shy away from these areas or eventually abandon nests near the wind farms.

"Some of these projects are going up in undeveloped areas that were kind of havens for these species," said James Watson, a Washington Department of Fish and Wildlife biologist who has spent 40 years studying raptors. "These turbines are occupying some of the flight space that is their bread and butter."

Zamora works for West Inc., an ecological field-study company that has become a major contractor for the wind-power industry. The company's surveys of turbine operations, which typically last a year or more, do miss some dead birds that get quickly picked apart by ravens, vultures or coyotes. Statisticians try to account for such removals in coming up with the final survey estimates that have been released for about a dozen Northwest wind farms.

Based on that information, the wind-power turbines currently operating in Oregon and Washington kill more than 6,500 birds and more than 3,000 bats annually.

In an era of climate change and a massive oil spill off the coast of Louisiana, windpower advocates say these deaths are an acceptable trade-off for development of a renewable energy source.

They note that house cats and other man-made hazards cause tens of millions of bird deaths each year.

Bird mortality "at wind farms, compared to other human-related causes of bird mortality, is biologically and statistically insignificant," wrote Mike Sagrillo, a consultant who writes for American Wind Energy Association.

In recent years, some of the biggest Northwest concerns about raptors and windpower development have been in the plateau country of Klickitat County, whose farm fields and grazing lands offer a buffet of chukars, rabbits and other prey to birds that nest in the nearby Columbia River Gorge.

Wind-power developers, after consultations with state biologists, have agreed to relocate some turbines away from canyon edges

frequented by raptors, and avoid installing them in some areas used by raptors or near their nets.

“We take the questions and concerns of wildlife impacts very seriously,” said Jan Johnson, a spokeswoman for Iberdrola Renewables.

<http://www.cascadepolicy.org/2010/02/17/increased-costs-are-blowin%E2%80%99-in-the-wind/>

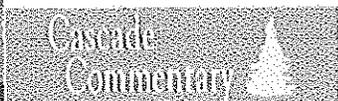
February 17, 2010

Increased Costs Are Blowin' in the Wind

Filed under:

- [Carbon Cartel Education Project](#)
- [Climate Change](#)
- [Commentaries](#)
- [Environment](#)

— Todd Wynn



by Todd Wynn and Eric Lowe

Increased Costs Are Blowin' in the Wind

Summary: Wind energy on the Pacific Northwest's electricity grid has increased substantially. Often overlooked are the impacts of increasing wind generation on the reliability and affordability of electricity that very well might outweigh any of the promised environmental benefits.

Download the [.pdf here](#), or click through the break to read the commentary.

Wind energy on the Pacific Northwest's electricity grid has increased substantially over the years, and this is leading to a number of problems. The Bonneville Power Administration (BPA), the Pacific Northwest's federal power marketing authority, is charged with integrating the large influx of wind power into the electricity grid. In 1998, the BPA's wind generation was roughly 25 megawatts (MW). Today, it totals 2,780 MW; and, with the Oregon [Renewable Portfolio Standards](#) passed in 2007, over 6,000 MW of wind power is expected to be on-line by [2013](#). Often overlooked are the impacts of increasing wind generation on the reliability and affordability of electricity that very well might outweigh any of the promised [environmental benefits](#).

The negative aspects of wind power are quite apparent. Obviously, wind is unpredictable and inconsistent, which creates a significant problem for BPA and electric utilities. To prevent brownouts or overloads on the grid, BPA must schedule energy production in advance.

However, the ability to predict when and how hard the wind will blow is extremely limited (usually a two- or three-day window) and often inaccurate.

Because wind power is so unpredictable, every megawatt must be backed up by an equal amount of reliable energy sources in reserve to replace the energy lost when the wind dies down. This means BPA must have a “balancing” reserve equal to or greater than the wind power capacity utilized at any given time. In the Pacific Northwest the backup source traditionally has been federally owned hydroelectric dams, which are shut on and off to respond to fluctuations in wind energy.

According to BPA, the ability of the federal hydro system to serve as a balancing reserve maxes out between 3,000 and 3,500 MW of installed wind generation. **This means that BPA can only back up roughly half of the projected increase in wind power.** In the near future, BPA will be forced to consider other options to establish a satisfactory reserve for integrating the large influx of unreliable energy.

Some efforts to rectify the integration problem include evaluating the feasibility of dynamic scheduling, which means breaking down the periods of time wind generation is scheduled (e.g. from hour-to-hour to 30-minute increments). Additionally, BPA is analyzing better ways to forecast wind speed and is researching storage technologies (such as compressed air or flywheel technology). Such advances are generally far-off, or would fail to address the problem completely. **Therefore, BPA eventually will be forced either to buy additional dispatchable generation capacity from third-party suppliers or to build additional back up capacity.** This leads to additional costs for BPA, the utilities which purchase power from BPA, and ultimately Oregon ratepayers.

Where this additional backup energy comes from is a critical question. PGE has begun the permitting process for a natural-gas fired plant in North-Central Oregon, and plans for a second natural gas plant in 2015 are underway. These plants will become even more necessary as the ability to use hydroelectric dams as backup is strained and wind generation capacity keeps expanding due to legislative mandates.

Building new natural gas facilities to serve as a backup for additional wind sources has several related problems. **First, natural gas is subject to price volatility, similar to buying gasoline at the pump. Uncertainty in production and delivery lead to significant fluctuations in natural gas costs. Further, natural gas facilities produce greenhouse gas emissions, which at least partly negates the purpose of the renewable energy mandates.** Thus, not only are electricity rates increasing because of additional wind generation, but the subsequent increase of natural gas reliance further exacerbates the problem by introducing volatility.

In 2009, BPA requested the Oregon Public Utility Commission (OPUC) to allow an electricity rate increase to reflect the costs of integrating wind. BPA proposed an increase of \$2.79 per kilowatt-month, and the OPUC set the final rate increase at \$1.29. According to BPA, the associated costs of the \$1.29 rate increase broke down as follows: \$0.05 for regulatory expenses, \$0.26 for load following (e.g. wind forecasting) and \$0.98 to correct imbalances (e.g. balancing reserves such as natural gas or hydro). The previous rate of \$0.68 per kilowatt-month did not reflect the costs associated with imbalances in wind production. The new rate represents a

doubling of wind integration costs, and this rate will continue to increase as more wind energy is added to the grid. These additional costs are eventually passed on to Oregon ratepayers.

It does not seem wise to promote and force Oregonians to purchase an energy source that has so many associated costs. At best, wind power simply replaces a clean, reliable and affordable source of energy: hydroelectricity. At worst, it invites increased price volatility, increased rates, and the prospect of more greenhouse gas-emitting facilities. **Ultimately, increasing wind generation leads to financial burdens on businesses and individuals across the state that ought to be considered further.** Legislators should not attempt to choose “winners” in emerging energy technologies, nor should they force costly energy sources upon ratepayers. Instead, utilities should allow ratepayers to pay the full cost of renewable energy voluntarily and to expand renewable energy according to ratepayer demand.

Todd Wynn is Climate Change and Energy Policy Analyst at Cascade Policy Institute, Oregon's free market public policy research organization. Eric Lowe is a research associate at Cascade Policy Institute.

June 17, 2010

Testimony of the Columbia Gorge Audubon Society, CGAS, before the Bonneville Power Administration and the Washington EFSEC Regarding the Whistling Ridge Wind Energy Project

Whistling Ridge is not so much about renewable energy development. We all support a renewable energy future for our nation, but this simply is the wrong project, at the wrong place, at the wrong time. The Condit Dam on the White Salmon River is going to be removed. Day-after-day, Condit churns out 8-10 megawatts of power, almost half of the firm power Whistling Ridge would produce. Should we rethink the facility's removal? No! Because it's been determined that salmon recovery is a higher priority than renewable energy from the White Salmon River.

So it is with the Columbia Gorge. The Gorge was set aside by Congress as a special place to be preserved and protected for all future generations. No one anticipated the abomination of 500', gleaming white towers with rotating blades being located on ridges just outside the National Scenic Area boundaries, otherwise the lines would have been drawn differently. If this proposal is permitted along with other proposals in the east Gorge, the iconic landscapes that the Scenic Act purports to protect will become subordinate by day to giant towers with whirling blades and by night to flashing red lights. If the Whistling Ridge project is permitted, then it will be time to ask Congress to redraw the boundaries. The incongruity of industrial wind energy projects up-and-down the Gorge on ridge-tops just beyond the Scenic Area boundary flies in the face of the very intent of Scenic Act itself.

A cheer-leading flier sent out by the project proponent asserts that in a "single year" Whistling Ridge will displace X barrels of oil, X tons of CO2 and X numbers of cars off the road. This is a cruel hoax. Where is the evidence for such an assertion? In fact, for every megawatt of wind energy developed, an off-set of fossil fuel-fired megawatt has to be developed as wind energy's unpredictability destabilizes the electrical grid (Northwest Power Planning Council). With a burgeoning population, naked consumerism and a Wall Street-driven, cowboy economy, we'll need every barrel of oil, every ton of coal and every cubic foot of gas to keep the economy humming. The best evidence we have for this is the Gulf oil "volcano". Even though the Gulf Coast is awash in oil - threatening their very way of life - elected officials have lined up to demand that the moratorium on deep-water oil drilling be lifted so that business as usual can continue. Moreover, the Whistling Ridge developer, SDS and its partners, were paid 20 million dollars in public money by BPA to NOT develop a gas-fired project in Bingen. Where was the concern by SDS for CO2 emissions then?

The flyer further asserts that there will be no "harm" to wildlife populations. This also is a hoax. The raptor mortality from wind energy projects developed in Klickitat county is ten times what the EIS predicted ("First Golden Eagle killed by Wind Turbines in WA State", Kathy Durbin, The Columbian). What went so terribly wrong? CGAS believes the cozy relationship between project proponents and EIS preparers is what went wrong. Getting a permit opens the spigots to fat state and federal subsidies, without which projects like Whistling Ridge would be unprofitable to develop.

By comparison, the wind energy industry makes much of birds killed by plate glass windows, cats and vehicle grills, but how many eagles, falcons and hawks are killed by these objects? Wind energy is very selective in its bird mortality and raptors are some of our most threatened bird populations. I would not want to be a raptor trying to negotiate the mid-Columbia landscapes these days, would you? And the US Fish & Wildlife Service wants to reintroduce the California Condor to its former range in the Gorge? What a joke!

At an initial hearing before EFSEC on Whistling Ridge, Wallace Stevenson, owner of SDS, said that his company has always tried to do the "right thing". CGAS assumes that this was said to help persuade EFSEC to render a decision favorable to Whistling Ridge. We would like to balance the record with this: Concurrent with establishing the National Scenic Area, Congress designated the lower White Salmon River under the National Wild and Scenic Rivers Act. The management area boundary included some SDS property, including lands along Spring Creek, a critical area for salmon spawning once they are reintroduced. The Forest Service offered SDS a land exchange so these lands would not be logged and the values for which the river was designated could be preserved. Apparently SDS was unable to get above appraised values for their lands, so the company cut the forest down to include Spring Creek and other areas where hiking trails and picnic areas were planned. Now we ask you, was this the right thing to do?

Lastly, the Northwest is not short on renewable energy. It's conveniently overlooked by industrial wind energy proponents, but 10,000 megawatts of high-quality renewable energy is churned out daily by the Columbia River hydro system. And it's come at a high price: Celilo Falls, once the Northwest's cultural and natural history icon, is gone and the world's greatest natural salmon fishery has been driven to near extinction. A sprawling industrial swath of wind turbines now stretches along both sides of the Columbia from Maryhill, WA to Walla Walla. These Columbia River landscapes of "Lewis and Clark" and "Oregon trail" fame have been disfigured and are no longer available to those who aspire to capture the spirit of these storied places. It would seem that we in the Northwest are selling our souls - our incomparable landscapes - to satisfy California's insatiable need for so-called "green" energy.

So, SDS and your sidekick, WindWorks Northwest, don't tell us that now we need to deface the Columbia Gorge to chase a few more "green" megawatts. The region has paid its dues. The wind energy industry, just like the dam builders, will hound out every wind resource to erect their turbines because a pot of money in state and federal subsidies await a secured permit. It is up to thoughtful citizens to insure that some areas are off-limits. Cries of NIMBYism can be heard, but let us not be made to feel guilty by renewable energy wonks, the wind energy industry, and county commissioners who do their bidding, for standing up to protect the last best places.

CGAS will comment further on the deficiencies our Society considers to be in the DEIS in another document within the comment period.

Thank you,

Jill Barker, spokesperson for the Columbia Gorge Audubon

[redacted]@aol.com
P.O. Box [redacted] - Mesier, OR 97040
(541) 478 - [redacted]

ANN LUEDERS
[REDACTED] WIND RIVER ROAD
CARSON, WA 98610

WR - DEIS
Public Comment #213

Please accept my comments below in support of the Whistling Ridge Energy Project:

Eminent Domain: the right of the government to take property from a private owner for public use by virtue of the superior dominion of its sovereignty of all lands within its jurisdictions.

Many times, over many years - the government has used the power of eminent domain to take property. Skamania County witnessed this in 1986 when Congress passed Public Law 99-663: The Columbia River Gorge National Scenic Area Act. This action, in and of itself was not a physical taking for which compensation was paid. It was a legislative action that caused, and continues to cause great economic hardships for individuals and communities within its boundaries.

Twenty four years later - a different sort of eminent domain is trying to grasp hold, and take something from Skamania County. Again, it isn't a physical taking - but it is a taking that has the potential to exacerbate economic hardships and impede solid, community friendly developments like the Whistling Ridge Energy Project. This taking is done when special interest groups use financial resources to seed public hearings with naysayers, and in essence - drown out the voice of residents whose communities are most directly affected by the proposed project.

Implementation of the Whistling Ridge Energy Project has many benefits, some not yet known, for Skamania County. The initial economic benefits associated with the project construction, such as local procurements and the 100+ family wage jobs are just the boost that we need. Consider the trickle down effects that will continue at completion of the project - \$731,000 in annual tax revenue, small business growth due to increased local spending, which in turn leads to business success, job growth and more.

At this point, many people would like to believe that a growing tourism base will carry us through these dark economic times. Some would even say that tourism can sustain Skamania County. I argue this concept by noting the lack of developable commercial land available within Skamania County. I would further note that while tourism is important to our communities, we need development that provides jobs and increases tax revenues without relying on the ebb and flow of tourists.

Skamania County needs the Whistling Ridge Energy Project to be a success - and SDS can make it happen. Projects such as this, which are environmentally friendly, economically friendly and community friendly spur similar ideas. They almost force existing and new companies to reconsider how they plan to operate in communities that need growth - but hope to maintain the hometown, rural area environment.

As the council continues with the hearing tonight - I would ask that you consider who is sharing their comments for and against this project. Those for the project - I suspect they live here, and have for a long time. I suspect that they have seen what Skamania County once was, what it could be - and how this project will be of great value to our home.


Ann Lueders
Carson, WA

Congress of the United States
Washington, DC 20515

WR - DEIS
Public Comment #214

November 18, 2009

Mr. Rory Westberg
Deputy Regional Director
National Park Service
Pacific West Region
909 First Avenue, Fifth Floor
Seattle, WA 98104

Dear Mr. Westberg:

We are writing to express our disappointment in the letter submitted by the National Park Service (NPS) to the Bonneville Power Administration (BPA) regarding the Whistling Ridge Energy Project. This letter mentions the project's proximity to the Lewis and Clark National Historic trail and the Oregon Pioneer National Historic Trail as well as it being adjacent to the Columbia River Gorge National Scenic Area as the basis for the Agency's objections.

However, as you know, the National Trails System Act (NTSA) does not give authority to regulate or restrict private land that is not part of the designated trail. In fact the only mention of scenic protection in the Act is in Section 7 (k) authorizing private parties to donate scenic, recreational or conservation easements that enhance the trail and have the donation considered as a public gift for tax purposes.

Although the letter was clearly outside any authority the NPS has under the NTSA, you went on to make specific demands, including "at minimum removing turbine corridor A1-A1 from further project consideration." The letter also asserts that "the visual quality of the region is specifically protected by designation of the Columbia Gorge National Scenic Area (CRGNSA) in 1986." However, the National Scenic Act does not provide any authority to regulate activities outside the National Scenic Area, which the letter acknowledges itself is the case with this project. The relevant section of the Act states:

Per Section 17. Savings provisions (Sec. 554o)

(a) Nothing in sections 544 to 544p of this title shall....

(10) establish protective perimeters or buffer zones around the scenic area or each special management area. The fact that activities or uses inconsistent with the management directives for the scenic area or special management areas can be seen or heard from these areas shall not, of itself, preclude such activities or uses up to the boundaries of the scenic area or special management areas.

As supporters of the development of new sources of renewable energy, including wind power, we are concerned that the Agency would act outside of its jurisdiction to attempt to obstruct this specific project and our nation's broader goals for renewable energy development. We therefore recommend that the May 18, 2009 letter be retracted and in the future that the Agency confine its public comments to those matters that are within its jurisdiction and are consistent with the laws and policies adopted by the Administration and Congress.

Please feel free to contact either of our offices if you have any questions.

Sincerely,



Brian Baird
Member of Congress



Doc Hastings
Member of Congress

cc: Andrew Montano, Bonneville Power Administration
Skamania County Board of Commissioners
Jason Spadaro, SDS Lumber

COMMITTEE ON SCIENCE AND TECHNOLOGY

Chairman
Subcommittee on Energy and Environment

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



BRIAN BAIRD
CONGRESS OF THE UNITED STATES
3RD DISTRICT, WASHINGTON

May 20, 2009

Washington Office:
2350 Rayburn HOB
Washington, D.C. 20515
(202) 225-3536

Vancouver Office:
General O.O. Howard House
750 Anderson Street, Suite B
Vancouver, WA 98661
(360) 695-6292

Olympia Office:
120 Union Avenue SE, Suite 105
Olympia, WA 98501
(360) 352-9768

WEBSITE: <http://www.house.gov/baird>

Regional Forester Mary Wagner
US Forest, Region 6
333 SW First Avenue
PO Box 3623
Portland, OR 97208

Dear Ms. Wagner,

I write to express my disappointment in both the United States Forest Service's (USFS) letter submitted to the Energy Facility Site Evaluation Council (EFSEC) and testimony provided by USFS staff at the hearing held on May 6, 2009, regarding the Whistling Ridge Energy Project.

As you know, the National Scenic Act does not provide any authority to regulate activities outside the National Scenic Area.

Per Section 17. Savings provisions (Sec. 544o)

(a) Nothing in sections 544 to 544p of this title shall...

(10) establish protective perimeters or buffer zones around the scenic area or each special management area. The fact that activities or uses inconsistent with the management directives for the scenic area or special management areas can be seen or heard from these areas shall not, of itself, preclude such activities or uses up to the boundaries of the scenic area or special management areas.

Despite no authority to do so, the USFS, as stated on the last page of its letter, recommends ... "the applicant eliminate turbine locations found to be visible from Scenic Areas KVAs." In addition, it is my understanding USFS staff testified that the Wind Energy project in Klickitat County should never have been permitted.

My concern is two-fold. Not only is this project outside of your agency's jurisdiction, but your actions could have detrimental impacts on the project with, as I see it, very minimal benefit. Let me be clear, I support wind turbine projects such as this. I believe them to be worthwhile and consistent with our nation's goal of generating clean, renewable energy. I question the value of blocking such a project and I question the agency's role in this issue.

RECEIVED

JUN 21 2010

P.O. Box 749
Washougal, WA 98671

ENERGY FACILITY SITE
EVALUATION COUNCIL

6-17-10

WR - DEIS
Public Comment #215

Washington Energy Facility Site Evaluation Council
905 Plum Street SE
Olympia, WA 98504-3172

Re: Whistling Ridge Energy Project Draft EIS, May 2010

Council Members:

The Whistling Ridge draft EIS is basically well organized and readable. Nevertheless, it is insufficiently thorough and contains specific inaccuracies and subjective conclusions. Some shortcomings we noted are:

- 1.) An appropriate EIS should list a range of alternatives. However, the draft lists only one action alternative. More alternatives could be developed by such means as relocating or eliminating problematical turbine sites.
- 2.) Applicant SDS owns 70,000 acres of land; within this expanse, the draft claims that Whistling Ridge is best suited for a wind farm. But considering such large ownership, plus numerous valid concerns associated with Whistling Ridge, the draft should address in detail other potential wind power locations on SDS lands.
- 3.) Avoidance of negative visual impacts is a primary objective of the Columbia Gorge Scenic Act, a fact that the draft purposely downplays. For example, no wind turbines are now visible from highways within the Scenic Area, but the draft indicates that they are. The draft achieves this misconception by making no distinction between views of turbines from the east end of the gorge outside of the Scenic Area and views from within the Scenic Area itself. Such intentional deception should be removed.
- 4.) Considering item 3 above, plus information now in the draft (including "Adverse Effects that Cannot be Avoided") and much public testimony about visual concerns, statements like one on page 3-154 are inappropriate and should be excised or restructured; that arbitrary statement claims that: "The project would have only minor to moderate impacts on visual quality as viewed from travel corridors inside the scenic area."
- 5.) The EIS should clearly state that, should this proposal be approved, it would set a precedent by allowing the first wind farm visible from within the Columbia Gorge Scenic Area.

6.) The draft also does not state, as it should, that this project would be the first such project allowed on Pacific Northwest forest lands. Moreover, the draft should recognize that no comprehensive studies have been made concerning effects of wind turbines upon Pacific Northwest forest dwelling wildlife.

7.) Potential impacts on mammals other than draft-mentioned bats and a single squirrel species should be described in the EIS. What animals are present in what relative numbers, and which are most likely to be driven from or avoid the area because of the turbines?

8.) Estimates of expected turbine-caused avian and bat mortalities should be included by utilizing available information from studies at existing wind farm projects. Such estimates would perhaps be difficult for those bird and bat species that prefer forest habitats. But most bird species that frequent Whistling Ridge (87 species, including the bald eagle and five others of "Special Concern", have been recorded there) are also found around wind farms where mortality studies have already been made. To simply state, as the draft now does, that the turbines would "not affect viability" of bird and bat populations "in the region" is quite inadequate. Cumulative impact data, rather than unfounded beliefs, are necessary in making decisions of the magnitude that this proposal encompasses.

9.) Since Class I Underwood Loam soil has "high potential for erosion from water" (pages 3- 5 and 6), why are at least 8 proposed turbines located on or directly adjacent to that soil type? And at least 18 turbines appear to be positioned on or near Class II soils having a "high landslide hazard rating" (pages 3-7 and 8). Consequently, geotech and/or soils scientists should closely examine those sites of questionable stability. Work of that nature has apparently been brief or lacking. Ultimately the EIS should define turbine proximity to both Class I and II soils and provide detailed plans to avoid and correct erosion, especially where those critical soil types might be involved. Another example of unsubstantiated conclusions sprinkled throughout the draft is this statement on page 1-37: "The proposed action would contribute incrementally, though in a minor way, on cumulative impacts to soil erosion as well as vegetation, terrestrial wildlife species and bird and bat species in the region."

10.) The project would require substantial soil relocation. Spoils sites should therefore be approved by a qualified specialist and their locations identified in the EIS draft.

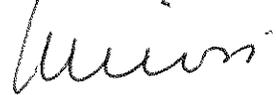
11.) We have examined previously submitted and forthcoming testimony from Keith Brown PhD regarding public health implications of this proposal. Based upon his solid review of pertinent research, we conclude the EIS cannot assure that health of residents living in the Whistling Ridge vicinity would not be adversely affected by turbine noise. Can the developers of the EIS draft provide such assurance? If not, noise concerns should alone exclude approval of this project. And human health concerns from expected turbine noise should be added to the draft's growing list of "Adverse Effects that Cannot be Avoided."

12.) The draft emphasizes anticipated monetary benefits derived from the project. It should also describe expected government expenses associated with the proposal. Too, the draft should include expected short and long term monetary benefits from continued timber harvest (the No Action alternative) at Whistling Ridge.

13.) Amid the draft's generally lucid narrative is the following mysterious sentence on page 1-9: "The site has a long history of commercial logging and associated absence of native habitat, reducing or eliminating the need to clear additional forest land." Could someone decipher that for us?

Thank you for the opportunity to comment on this draft. Please respond to our comments and concerns in the next version of the EIS.

Columbia Gorge residents,


Willemina Niosi MD
and Jim Hutchison 

cc: BPA

TESTIMONY OF JAMES M. HUTCHISON
TO THE WASHINGTON ENERGY SITING COUNCIL
REGARDING SDS WIND POWER APPLICATION

The SDS proposed wind turbine field you are now studying is unique in several respects: It would be the first such project located directly adjacent to the Columbia River Gorge Scenic Area and would introduce turbine towers visible from various locations within the Scenic Area. The Gorge Act, though it did not visualize tall towers that would impact views from the gorge, is very specific about aesthetics. Since the Act's implementation, even single nonconforming houses have generated extensive debate.

Impacts on timber production and wildlife are major concerns related to the proposal. SDS intends to reduce all vegetation to no more than 15 feet high within 150 feet of each turbine. Within the next 350 feet, vegetation would be kept less than 50 feet high. Nearly all timber harvest would thus be permanently eliminated for approximately 18 acres around each turbine. For a 100 turbine field, this would total 1,800 acres, or nearly 3 square miles, of lost timber production. Turbine access roads and appurtenant facilities would multiply this loss several fold.

Numerous wildlife species, not just those threatened or endangered, rely on forest habitats. Bird mortality from wind turbines is fairly well documented, but most such studies have focused on turbines located outside of forest areas. Other wildlife concerns are associated with the SDS proposal; these concerns include seasonal use patterns, travel corridors, habitat alteration or removal, soil loss and associated stream sedimentation, and area abandonment by wildlife due to turbine noise. Many animals, with hearing more acute than ours, can be detrimentally affected by noise. Considering these and related concerns, the Washington Department of Fish and Wildlife's recommendation for a comprehensive cumulative effects analysis should be required for this or any wind turbine application, especially when proposed in a forest setting.

Various kinds of EIS studies are typically prepared and funded by the projects' proponents. However, for this and other wind power projects in Washington, your agency, the Energy Siting Council, prepares the EIS. That approach appears a most questionable use of public funds for this highly contentious proposed gorge project which the Governor may well not approve in the long run.

A Skamania County representative will apparently join the Siting Council to consider the Whistling Ridge turbine proposal. That person should logically be as open-minded and nonbiased as possible. Yet, it should be stressed that Skamania County's Board of Commissioners is already on record as favoring this proposal, plus another controversial proposal by SDS for a large rural resort within the Gorge Scenic Area, plus a big tribe-sponsored gorge gambling casino at Cascade Locks. Perhaps a bit of bias involved there!

This wind power application involves several precedents: No large wind power installations are in or next to the Gorge Scenic Area, and none in the Pacific Northwest

are located on forest lands. Impacts on wildlife and timber harvest in such locations are essentially little studied and unknown. Wind is a legitimate source of power production, but only if it does not conflict overly with other values. In this case, placing multiple wind turbines which would remove hundreds of acres of sustainable tree harvest on forest lands favored by many forms of wildlife immediately adjacent to the Gorge Scenic Area appears substantially unwise.

James M. Hutchison 5-6-09
Retired fish and wildlife biologist
P.O. Box [REDACTED] Washougal, WA 98671

June 17, 2010

EFSEC
905 Plum Street SE
Olympia, Wa 98504-3172

RE: Whistling Ridge Energy Project
Skamania County, Wa

To whom it may concern:

We are residents of Skamania County, Washington and would like to provide our support for the proposed Whistling Ridge wind power site. Alternative sources of energy are a vital part of our future, and fit with National goals of implementing programs to achieve energy sources. We commend SDS for taking the initiative to research and implement this energy source west of the Cascades. The analysis of mitigation methods to achieve a safe and effective energy source such as wind power have already been implemented in other areas of Washington State, as well as throughout the world. We are hoping to see more of these projects implemented in the future.

Sincerely,



James and Cynthia Shank
P.O. Box [REDACTED]
Carson, Wa 98610

RECEIVED

JUN 23 2010

WR - DEIS
Public Comment #217

ENERGY FACILITY SITE
EVALUATION COUNCIL

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Dear Washington EFSEC

RE: Governor Gregoire must Support Whistling Ridge

First and foremost, I wanted to be brief and not waste your time. I am writing to comment on the DEIS for the Whistling Ridge Energy Project, proposed in the Underwood area, along the Skamania and Klickitat county line. The proposed project would have significant positive economic impacts without effecting wildlife and plant habitat. In my opinion, this project would **NOT** affect any scenic beauty of the Columbia River Gorge National Scenic Area. EFSEC should recommend that Governor Gregoire approve this project.

I was born, raised and currently live next to this proposed project site. I have found that many people form an opinion based on untrue facts. I have read and reviewed the draft environmental impact statement, and in doing so have evaluated all the pros and cons of this project. Like any project you have people on both sides and sometimes in the middle. I feel that it is obvious that the pros way outweigh the cons.

This project is a must; and quite frankly a need here in our community! It is good for our economy and for the future need for energy. I am in full support for renewable energy. We need to understand for our future to be successful, this project must go through. SDS Lumber Company has worked hard and has given so much to this community. Most of the people that are opposing this do not live in this area and do not really understand what our needs are right now and what they will be in the future. Thank you for your time.



Ryan Kreps

CEO / RADCOMP Technologies

██████████@radcomp.com

Office. 509.493.██████████

Toll Free. 866.490.██████████

Cell. 541.490.██████████

Fax. 360.844.██████████

PO Box ██████████ | ██████████ N. Main | White Salmon, WA 98672 | www.radcomp.com