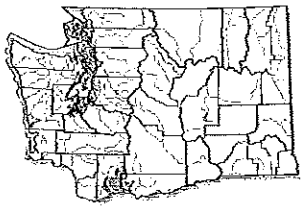
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 19, 2010

Andrew M. Montaño
Environmental Protection Specialist
Bonneville Power Administration
PO Box 3621 KEC-4
Portland, OR 92708-3621



Your address is in the **Wind-White Salmon** watershed

Stephen Posner
Energy Facility Site Manager
Washington EFSEC
905 Plum Street Southeast, Third Floor
Olympia, WA 98504-3172

Dear Mr. Montaño and Mr. Posner:

Thank you for the opportunity to comment on the draft environmental impact statement for the Whistling Ridge Energy project located about seven miles north of the City of White Salmon in Skamania County. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

TOXICS CLEANUP: Connie Groven (360) 407-6254

Toxics Cleanup program comments submitted May 12, 2009, still apply to the project described (see enclosure). There are no new comments submitted at this time.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM: 10-2884)
Enclosure

cc: Connie Groven, TCP

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

May 12, 2009

Mr. Allen Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172

Dear Mr. Fisksdal:

Thank you for the opportunity to comment on the determination of significance scoping notice for the Whistling Ridge Energy project (Application No. 2009-01) located in Skamania County as proposed by Whistling Ridge Energy LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SEPA REGIONAL PROJECT LEAD: Sarah Lukas (360) 407-7459

SHORELANDS:
The submitted scoping notice identifies the intent of preparing a floodplain and wetland assessment as part of the analysis used in the draft environmental impact statement (DEIS). The assessment should include: An inventory of all wetlands and areas of floodplain in the project area and within the vicinity of the proposal; the environmental values these aquatic features provide to the landscape; what and how the floodplain areas and wetlands will be impacted by the proposal; what environmental values will be lost from these impacts; and mitigation measures to offset the proposed environmental impacts that cannot be avoided.

The DEIS should also include an analysis of all other surface water bodies in, and within the vicinity of, the project site. An equivalent documentation of existing environmental values, proposed impacts, and proposed mitigation measures to unavoidable impacts should be outlined in the DEIS as requested for the wetlands and floodplain areas above.

TOXICS CLEANUP: Connie Groven (360) 407-6254

If contamination is currently known or suspected during construction, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily visible, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required contact Connie Groven with the Toxic Cleanup Program at the Southwest Regional Office at the phone number given above.

WATER QUALITY: Roberta Woods (360) 407-6269

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other

Michelle, Kayce (COM)

From: Posner, Stephen (COM)
Sent: Monday, July 19, 2010 12:31 PM
To: Michelle, Kayce (COM)
Subject: FW: SEPA No. 10-2884 "DEIS: Whistling Ridge Energy project" Comment Letter
Attachments: 10-2884.pdf; Enclosure.pdf

Importance: High

Please log in as a WR DEIS comment. Thanks.

From: Mendoza, Sonia (ECY)
Sent: Monday, July 19, 2010 9:58 AM
To: ammontano@bpa.gov; Posner, Stephen (COM)
Cc: Groven, Connie (ECY)
Subject: SEPA No. 10-2884 "DEIS: Whistling Ridge Energy project" Comment Letter
Importance: High

Mr. Montaño and Mr. Posner,
Per your request is our comments for the Whistling Ridge Energy project (Ecology File No. 10-2884) Comments are due today 7/19/10.

Please reply to this message for confirmation. Thank you.

Sonia Mendoza
Department of Ecology-SWRO
SEPA Coordinator
360-407-6313 (P)
360-407-6305(F)
Please consider the environment before printing this e-mail

WR - DEIS
Agency Comment #2

Michelle, Kayce (COM)

From: Posner, Stephen (COM)
Sent: Monday, July 19, 2010 3:29 PM
To: Michelle, Kayce (COM)
Subject: FW: DNR Comments on Whistling Ridge DEIS

Kayce,

Please log in as a comment on the DEIS for WR. Thanks.

From: O NEAL, ELIZABETH (DNR) **On Behalf Of** KIHIA, SIMON (DNR)
Sent: Monday, July 19, 2010 3:05 PM
To: Posner, Stephen (COM)
Cc: TURLEY, CHUCK (DNR); SPRAGUE, CLAY (DNR); CRAMER, DARIN (DNR); NORMAN, DAVE (DNR); HERMAN, JED (DNR); SHRAMEK, JOSEPH (DNR); YOUNG, LENNY (DNR)
Subject: DNR Comments on Whistling Ridge DEIS

Whistling Ridge Comments.pdf

July 19, 2010

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

RE: DNR Comments on Whistling Ridge DEIS

Dear Stephen:

Thank you for the opportunity to review and comment on the joint NEPA SEPA Whistling Ridge draft environmental impact statement (DEIS). We looked primarily at fire hazard, plant species and communities, northern spotted owls and WA Department of Natural Resources' Habitat Conservation Plan (DNR HCP), forest practice requirements, and surface mines and reclamation.

Some of our concerns include: the presence or impacts to Oregon white oak/Idaho fescue plant communities; northern spotted owls, their habitat and associated HCPs; forest practice requirements for this proposal, and a permitted source of aggregate for roads and structures. Our adjacent HCP land to the north is managed to provide habitat that makes a significant contribution to demographic support, maintenance of species distribution and facilitation of owl dispersal. The DEIS on page 3-56 states there are no HCPs in or near the project area. Forest practices owl protection requirements were also not correctly explained. Please also note that state agency wildlife species review is typically done by WA Department of Fish and Wildlife (WDFW), and DNR biologists did not look at impacts to species not protected under the DNR forest land HCP in eastern Washington, other than compliance with Forest Practices Rules.

FPA conversion permits and DNR surface mining reclamation permits (SMRP) are required for timber harvest and rock or gravel mining associated with conversion of forest land and the associated building or construction at the wind tower sites. This was not clear in the DEIS and the SMRP was not listed in Table 4-1. For more details as to DNR concerns and specific requests for DEIS corrections or DEIS additions on the topics noted above please see the following text. Staff contacts are also included for more information or questions.

Fire Hazard

DNR has fire protection responsibility on a significant portion of the land within the project area. After review of the DEIS, we believe that implementation of the fire related mitigation measures listed in Chapter 3, section 3.6.3 of the DEIS (5/1/2010) would adequately address fire prevention responsibility and response on those lands. Thank you for this consideration.

Contact:
Darrel Johnston
Phone: (360) 902-2112
darrel.johnston@dnr.wa.gov

Plant Species and Communities

Issues:

- The EIS appears to adequately address 'Special Status Plant Species.' They appear to have queried appropriate sources of information and to have done on-the-ground surveys at the appropriate times. Thank you for this consideration.
- On page 3-43, there is mention of the Oregon white oak/Idaho fescue plant community. However, there is no subsequent mention of it. Was it surveyed for and not found? Was it not surveyed for, because there was no requirement to do so?

Request:

Add a statement(s?) about the Oregon white oak/Idaho fescue plant community on page 3-74 where the impacts to special status plant species are discussed.

Contact:
John Gamon
(360) 902-1661
john.gamon@dnr.wa.gov

Northern Spotted Owls and Associated DNR HCP

Note: State agency wildlife species review is typically done by WDFW. DNR biologists looked at impacts to those species protected under our DNR forest land HCP in the range of the northern spotted owl, not other eastern Washington wildlife species. See also DNR comments as to Forest Practice Rule requirements related to spotted owls in the next DNR comment section.

- Whistling Ridge Energy Project Draft EIS, Page 3-50 states surveys were conducted for northern spotted owl presence in 2008-2009 using the 1992 USFWS survey protocol. No spotted owls were detected during these surveys. Page 3-52 states that the longstanding absence of any northern spotted owls at the historic

site centers suggest that these site centers likely no longer qualify for special protection. Page 3-53 states that the Turnstone and DNR/NCASI surveys affirmatively documented the absence of northern spotted owl site centers in these historic sites. They also state that surveys conducted in and near the project area indicate that spotted owls are not present. Additional surveys were conducted during three daytime site visits over the seasonal breeding window in 2009 to determine if spotted owls may be in the vicinity but were not vocalizing due to the presence of barred owls. No spotted owls were detected.

Comment: It is widely understood that one of the most serious threats facing the northern spotted owl is the recent range expansion of another closely related owl species, the barred owl, ***Strix varia***. Because barred owls may attack and kill spotted owls, spotted owls are known to vocalize less when around barred owls. This poses a serious problem when the primary means of establishing spotted owl presence is spotted owl vocal response to simulated calls. Hence, vocalization survey results may be unreliable as spotted owls are unlikely to vocalize due to the presence of barred owls, which was the case during the surveys for this project.

Request:

Please note that DNR biologists do not believe that three daytime visits over one season is sufficient evidence to determine that spotted owls are not in the vicinity and are just not vocalizing. Vocalization survey results may be unreliable.

- Whistling Ridge Energy Project Draft EIS, Page 3-56 "A review of USFWS habitat conservation plans issued in the Pacific region indicates there are no spotted owl-related habitat conservation plans applicable in or near the project area." (USFWS 2009b)

  Literature citation: U.S. Fish and Wildlife Service (USFWS). 2009b. Conservation Plan and Agreement Database. Accessed via the Internet at:
  http://ecos.fws.gov/conserv_plans/public.jsp

  Comment: DNR accessed this website and found the Washington Dept. of Natural Resources HCP identified with 5 listed species covered under this HCP. One of the listed species identified is the northern spotted owl. The area covered under the Washington Dept. of Natural Resources HCP conservation strategy for the northern spotted owl covers DNR managed land directly adjacent to the Whistling Ridge Energy Project to the north.

  Hence, the information provided in the Whistling Ridge Energy Project Draft EIS that "...there are no spotted owl-related habitat conservation plans applicable in or near the project area".... is incorrect.

  Comment: This project may interfere with a spotted owl's ability to disperse from the DNR HCP conservation area to other areas in the vicinity. The state trust lands *HCP Amendment #1 Administrative Amendment to the Northern Spotted Owl Conservation Strategy for the Klickitat HCP Planning Unit,* April 2004 has designated areas for northern spotted owl Nesting, Roosting, and Foraging (NRF) habitat management located directly adjacent to this project's northern boundary. The DNR conservation objective for the northern spotted owl is to provide habitat that makes a significant contribution to demographic support, maintenance of species distribution and facilitation of dispersal.

Request:

Please correct the DEIS text concerning DNR HCP location. You might also reconsider and reword your conclusion that no project impacts are expected to spotted owls.

Contact:

Tami Miketa (360) 902-1481

tamara.miketa@dnr.wa.gov

Forest Practices

Resources at risk by section (from DNR Forest Practices Risk Assessment Tracking GIS data):

- All sections in the proposal are within the Bull Trout overlay delineated in state FP rules (WAC- 222).
- T3N-R10E-S5 There is an F type stream with possible Bull Trout required protections. There are potential unstable slopes indicated.
- T3N-R10E-S6 There is an F type stream with possible Bull Trout required protections. There are potential unstable slopes indicated. There is a Spotted Owl circle.
- T3N-R10E-S7 There is an historic site and there are potential unstable slopes indicated.
- T3N-R10E-S8 There is an historic site.
- T3N-R9E-S12 No issues
- T3N-R9E-S13 There are potential unstable slopes indicated.

Applicable FP rules that may be relevant to the project. Most of these would come into play if there is logging or road building near any waters.

- 222-16-030 Water typing systems
- 222-16-050 Classes of Forest Practices
- 222-20-010 Applications and Notifications
- 222-24-030 Road construction
- 222-24-040 Water crossing structures
- 222-24-052 Road maintenance
- 222-30-020 Harvest unit planning and designs (wetland management zones)
- 222-30-022 Eastern Washington RMZs
- 222-30-050 Felling and Bucking
- 222-30-070 Ground based logging systems.

Comments, concerns and potential mitigation that would be required (for specific DEIS page numbers):

- 2-9, 2-15. Harvesting trees in areas that are not already cleared. This would require an approved Forest Practices Application prior to harvest. Need for Forest Practices Application is already listed in required permits on page 4-3.
- 2-11. The map shows a riparian area. The wetland is described in 3-24. County protection measures are described on 3-39 for category II wetlands.

Request:

If this is on forest land you should verify if it is a Type A or Type B wetland and that the 100 foot buffer would also meet or exceed any FP Rule requirements for a Type A or B wetland (WAC 222-30-020) for that location.

- 3-11. The potential for landslides is described with building of the wind towers. On 3-12, it is stated that there will be no impact to drainages and on 3-12 and 3-13 are mitigation measures.

Request:

Acknowledge that unstable slopes with potential to deliver to public resources would require appropriate protection under forest practices rules to minimize impacts to any unstable areas and associated public resources and/or public safety. This mitigation requirement is not noted.

- 3-28. Approximately 22 acres of the site will be converted from timber management to non forestry use around the wind turbine sites. All of the Forest Practices Applications that were applied for in the area

indicated that the sites would be kept in forestry, not converted to a non-forestry use. This appears to be a violation of the Forest Practices Rules. Potential conversion impacts were not considered. Any future FPAs to harvest trees near wind tower locations will require a conversion FPA (Class IV-General) and any current timber harvesting under current FPAs may be in violation as well. State law (RCW 76.09.460) allows that Skamania County may deny any conversion permits for up to six years on any sites where FPAs were not submitted as conversion FPAs. Under Forest Practices Rules and Regulations (WAC 222-34) DNR requires reforestation to occur on all harvested acres that will remain in forestry.

Request:

All applicable FPAs should be amended or reapplied for to reflect conversion activities (RCW 76.09.470). Any new Class IV-General FPAs must await completion of the final EIS before they can be approved for harvest by DNR.

- 3-50. The comment is made that the project is not sited in or near any Spotted Owls or Spotted Owl activity site centers. There are two Spotted Owl circles within portions of the proposal area.

Request:

Please correct the inaccurate statement concerning spotted owls.

- 3-50 and 3-53. "The two Spotted Owl site centers are no longer considered to be occupied pursuant to USF&W protocols and state law." This is an inaccurate statement. The two Spotted Owl circles are still in the state data base and have not been decertified as of this date. Forest Practices rules and regulations still require appropriate protections (WAC 222-16-080(6)).

Request:

Please correct the inaccurate statement concerning spotted owls and correctly state the appropriate FP Rule mitigation measures that are required.

- 3-75 and 3-78. "The proposal would not impact the White Salmon SOSEA's 40% suitable Spotted Owl habitat level." This is an inaccurate statement. The habitat level is calculated on a circle by circle basis, not over the entire SOSEA. There is a small mapped portion of potential habitat in one of the two circles in the proposal.

Request:

Please document whether this proposal (including all of the associated timber harvests) will harvest suitable owl habitat (WAC 222-16-085) and or impact the suitable habitat totals for one of the spotted owl circles, if that is the case (WAC 222-10-040).

- 3-209 "The Haran Farmstead is recommended as ineligible for the NRHP." This statement may or may not be accurate. This site has been listed in DNR's GIS FP Risk Assessment Tool as a site that may require protection if there is any potential for disturbance to the site. Any potential impacts to the historic site may require a site protection plan.

Request:

Contact the Washington State Department of Archaeology and Historic Preservation. Document why there will be no adverse impacts or how such impacts can be mitigated with a site protection plan if necessary.

Contact:

Joseph L. Blazek
office: 509-925-0913
cell: 509-856-6465
joe.blazek@dnr.wa.gov

Surface Mines and Reclamation

Issue:

DNR permits and regulates surface mining reclamation on state and private lands.
The proposal calls for at least 2.5 miles of new road construction as well as significant improvements and widening of the existing forestry roads to handle the oversized loads not associated with timber management. Since this work as proposed is being performed primarily to facilitate a wind power project, the DNR will not allow the use of aggregate from pits or quarries that do not have an active surface mine reclamation permit.

Request:

Please note that aggregate used to improve/construct roads, or for construction of Whistling Ridge project related foundations and infrastructure must come from a permitted surface mine, not from a forestry pit or quarry locations (exempt/unpermitted surface mine sites).

Contact:
John Bromley
Office (360) 902-1452
Cell (360) 280-7518
Email john.bromley@dnr.wa.gov

For any other general questions regarding these comments please do not hesitate to contact me.

Best Regards,

Simon M. Kihia,
Manager, Environmental Review and Analysis

WASHINGTON STATE DEPARTMENT OF
Natural Resources
Peter Goldmark - Commissioner of Public Lands

Caring for
your natural resources
... now and forever

July 19, 2010

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

RE: DNR Comments on Whistling Ridge DEIS

Dear Stephen:

Thank you for the opportunity to review and comment on the joint NEPA SEPA Whistling Ridge draft environmental impact statement (DEIS). We looked primarily at fire hazard, plant species and communities, northern spotted owls and WA Department of Natural Resources' Habitat Conservation Plan (DNR HCP), forest practice requirements, and surface mines and reclamation.

Some of our concerns include: the presence or impacts to Oregon white oak/Idaho fescue plant communities; northern spotted owls, their habitat and associated HCPs; forest practice requirements for this proposal, and a permitted source of aggregate for roads and structures. Our adjacent HCP land to the north is managed to provide habitat that makes a significant contribution to demographic support, maintenance of species distribution and facilitation of owl dispersal. The DEIS on page 3-56 states there are no HCPs in or near the project area. Forest practices owl protection requirements were also not correctly explained. Please also note that state agency wildlife species review is typically done by WA Department of Fish and Wildlife (WDFW), and DNR biologists did not look at impacts to species not protected under the DNR forest land HCP in eastern Washington, other than compliance with Forest Practices Rules.

FPA conversion permits and DNR surface mining reclamation permits (SMRP) are required for timber harvest and rock or gravel mining associated with conversion of forest land and the associated building or construction at the wind tower sites. This was not clear in the DEIS and the SMRP was not listed in Table 4-1. For more details as to DNR concerns and specific requests for DEIS corrections or DEIS additions on the topics noted above please see the following text. Staff contacts are also included for more information or questions.

Fire Hazard

DNR has fire protection responsibility on a significant portion of the land within the project area. After review of the DEIS, we believe that implementation of the fire related mitigation measures listed in Chapter 3, section 3.6.3 of the DEIS (5/1/2010) would adequately address fire prevention responsibility and response on those lands. Thank you for this consideration.

Contact:

Contact:
Darrel Johnston
Phone: (360) 902-2112
darrel.johnston@dnr.wa.gov

Plant Species and Communities

Issues:

- The EIS appears to adequately address 'Special Status Plant Species.' They appear to have queried appropriate sources of information and to have done on-the-ground surveys at the appropriate times. Thank you for this consideration.
- On page 3-43, there is mention of the Oregon white oak/Idaho fescue plant community. However, there is no subsequent mention of it. Was it surveyed for and not found? Was it not surveyed for, because there was no requirement to do so?

Request:

Add a statement(s?) about the Oregon white oak/Idaho fescue plant community on page 3-74 where the impacts to special status plant species are discussed.

Contact:
John Gamon
(360) 902-1661
john.gamon@dnr.wa.gov

Northern Spotted Owls and Associated DNR HCP

Note: State agency wildlife species review is typically done by WDFW. DNR biologists looked at impacts to those species protected under our DNR forest land HCP in the range of the northern spotted owl, not other eastern Washington wildlife species. See also DNR comments as to Forest Practice Rule requirements related to spotted owls in the next DNR comment section.

- Whistling Ridge Energy Project Draft EIS, Page 3-50 states surveys were conducted for northern spotted owl presence in 2008-2009 using the 1992 USFWS survey protocol. No spotted owls were detected during these surveys. Page 3-52 states that the longstanding absence of any northern spotted owls at the historic site centers suggest that these site centers likely no longer qualify for special protection. Page 3-53 states that the Turnstone and DNR/NCASI surveys affirmatively documented the absence of northern spotted owl site centers in these historic sites. They also state that surveys conducted in and near the project area indicate that spotted owls are not present. Additional surveys were conducted during three daytime site visits over the seasonal breeding window in 2009 to determine if spotted owls may be in the vicinity but were not vocalizing due to the presence of barred owls. No spotted owls were detected.

  Comment: It is widely understood that one of the most serious threats facing the northern spotted owl is the recent range expansion of another closely related owl species, the barred owl, ***Strix varia.*** Because barred owls may attack and kill spotted owls, spotted owls are

known to vocalize less when around barred owls. This poses a serious problem when the primary means of establishing spotted owl presence is spotted owl vocal response to simulated calls. Hence, vocalization survey results may be unreliable as spotted owls are unlikely to vocalize due to the presence of barred owls, which was the case during the surveys for this project.

Request:

Please note that DNR biologists do not believe that three daytime visits over one season is sufficient evidence to determine that spotted owls are not in the vicinity and are just not vocalizing. Vocalization survey results may be unreliable.

- Whistling Ridge Energy Project Draft EIS, Page 3-56 "A review of USFWS habitat conservation plans issued in the Pacific region indicates there are no spotted owl-related habitat conservation plans applicable in or near the project area." (USFWS 2009b)

  Literature citation: U.S. Fish and Wildlife Service (USFWS). 2009b. Conservation Plan and Agreement Database. Accessed via the Internet at: http://ecos.fws.gov/conserv_plans/public.jsp

  Comment: DNR accessed this website and found the Washington Dept. of Natural Resources HCP identified with 5 listed species covered under this HCP. One of the listed species identified is the northern spotted owl. The area covered under the Washington Dept. of Natural Resources HCP conservation strategy for the northern spotted owl covers DNR managed land directly adjacent to the Whistling Ridge Energy Project to the north.

  Hence, the information provided in the Whistling Ridge Energy Project Draft EIS that "...there are no spotted owl-related habitat conservation plans applicable in or near the project area".... is incorrect.

  Comment: This project may interfere with a spotted owl's ability to disperse from the DNR HCP conservation area to other areas in the vicinity. The state trust lands *HCP Amendment #1 Administrative Amendment to the Northern Spotted Owl Conservation Strategy for the Klickitat HCP Planning Unit,* April 2004 has designated areas for northern spotted owl Nesting, Roosting, and Foraging (NRF) habitat management located directly adjacent to this project's northern boundary. The DNR conservation objective for the northern spotted owl is to provide habitat that makes a significant contribution to demographic support, maintenance of species distribution and facilitation of dispersal.

Request:

Please correct the DEIS text concerning DNR HCP location. You might also reconsider and reword your conclusion that no project impacts are expected to spotted owls.

Contact:

Tami Miketa (360) 902-1481
tamara.miketa@dnr.wa.gov

Forest Practices

Resources at risk by section (from DNR Forest Practices Risk Assessment Tracking GIS data):

- All sections in the proposal are within the Bull Trout overlay delineated in state FP rules (WAC- 222).
- T3N-R10E-S5 There is an F type stream with possible Bull Trout required protections. There are potential unstable slopes indicated.
- T3N-R10E-S6 There is an F type stream with possible Bull Trout required protections. There are potential unstable slopes indicated. There is a Spotted Owl circle.
- T3N-R10E-S7 There is an historic site and there are potential unstable slopes indicated.
- T3N-R10E-S8 There is an historic site.
- T3N-R9E-S12 No issues
- T3N-R9E-S13 There are potential unstable slopes indicated.

Applicable FP rules that may be relevant to the project. Most of these would come into play if there is logging or road building near any waters.

- 222-16-030 Water typing systems
- 222-16-050 Classes of Forest Practices
- 222-20-010 Applications and Notifications
- 222-24-030 Road construction
- 222-24-040 Water crossing structures
- 222-24-052 Road maintenance
- 222-30-020 Harvest unit planning and designs (wetland management zones)
- 222-30-022 Eastern Washington RMZs
- 222-30-050 Felling and Bucking
- 222-30-070 Ground based logging systems.

Comments, concerns and potential mitigation that would be required (for specific DEIS page numbers):

- 2-9, 2-15. Harvesting trees in areas that are not already cleared. This would require an approved Forest Practices Application prior to harvest. Need for Forest Practices Application is already listed in required permits on page 4-3.
- 2-11. The map shows a riparian area. The wetland is described in 3-24. County protection measures are described on 3-39 for category II wetlands.

Request:

If this is on forest land you should verify if it is a Type A or Type B wetland and that the 100 foot buffer would also meet or exceed any FP Rule requirements for a Type A or B wetland (WAC 222-30-020) for that location.

- 3-11. The potential for landslides is described with building of the wind towers. On 3-12, it is stated that there will be no impact to drainages and on 3-12 and 3-13 are mitigation measures.

Request:

Acknowledge that unstable slopes with potential to deliver to public resources would require appropriate protection under forest practices rules to minimize impacts to any

unstable areas and associated public resources and/or public safety. This mitigation requirement is not noted.

- 3-28. Approximately 22 acres of the site will be converted from timber management to non forestry use around the wind turbine sites. All of the Forest Practices Applications that were applied for in the area indicated that the sites would be kept in forestry, not converted to a non-forestry use. This appears to be a violation of the Forest Practices Rules. Potential conversion impacts were not considered. Any future FPAs to harvest trees near wind tower locations will require a conversion FPA (Class IV-General) and any current timber harvesting under current FPAs may be in violation as well. State law (RCW 76.09.460) allows that Skamania County may deny any conversion permits for up to six years on any sites where FPAs were not submitted as conversion FPAs. Under Forest Practices Rules and Regulations (WAC 222-34) DNR requires reforestation to occur on all harvested acres that will remain in forestry.

Request:

All applicable FPAs should be amended or reapplied for to reflect conversion activities (RCW 76.09.470). Any new Class IV-General FPAs must await completion of the final EIS before they can be approved for harvest by DNR.

- 3-50. The comment is made that the project is not sited in or near any Spotted Owls or Spotted Owl activity site centers. There are two Spotted Owl circles within portions of the proposal area.

Request:

Please correct the inaccurate statement concerning spotted owls.

- 3-50 and 3-53. "The two Spotted Owl site centers are no longer considered to be occupied pursuant to USF&W protocols and state law." This is an inaccurate statement. The two Spotted Owl circles are still in the state data base and have not been decertified as of this date. Forest Practices rules and regulations still require appropriate protections (WAC 222-16-080(6)).

Request:

Please correct the inaccurate statement concerning spotted owls and correctly state the appropriate FP Rule mitigation measures that are required.

- 3-75 and 3-78. "The proposal would not impact the White Salmon SOSEA's 40% suitable Spotted Owl habitat level." This is an inaccurate statement. The habitat level is calculated on a circle by circle basis, not over the entire SOSEA. There is a small mapped portion of potential habitat in one of the two circles in the proposal.

Request:

Please document whether this proposal (including all of the associated timber harvests) will harvest suitable owl habitat (WAC 222-16-085) and or impact the suitable habitat totals for one of the spotted owl circles, if that is the case (WAC 222-10-040).

- 3-209 "The Haran Farmstead is recommended as ineligible for the NRHP." This statement may or may not be accurate. This site has been listed in DNR's GIS FP Risk Assessment Tool as a site that may require protection if there is any potential for disturbance to the site. Any potential impacts to the historic site may require a site

protection plan.

Request:

Contact the Washington State Department of Archaeology and Historic Preservation. Document why there will be no adverse impacts or how such impacts can be mitigated with a site protection plan if necessary.

Contact:
Joseph L. Blazek
office: 509-925-0913
cell: 509-856-6465
joe.blazek@dnr.wa.gov

Surface Mines and Reclamation

Issue:

DNR permits and regulates surface mining reclamation on state and private lands. The proposal calls for at least 2.5 miles of new road construction as well as significant improvements and widening of the existing forestry roads to handle the oversized loads not associated with timber management. Since this work as proposed is being performed primarily to facilitate a wind power project, the DNR will not allow the use of aggregate from pits or quarries that do not have an active surface mine reclamation permit.

Request:

Please note that aggregate used to improve/construct roads, or for construction of Whistling Ridge project related foundations and infrastructure must come from a permitted surface mine, not from a forestry pit or quarry locations (exempt/unpermitted surface mine sites).

Contact:
John Bromley
Office (360) 902-1452
Cell (360) 280-7518
Email john.bromley@dnr.wa.gov

For any other general questions regarding these comments please do not hesitate to contact me.

Best Regards,

Simon M. Kihia,
Manager, Environmental Review and Analysis

WR - DEIS
Agency Comment #3

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

In Reply Refer To:
13410-2010-I-0447

JUL 19 2010

Mr. Andrew Montano
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Subject: Whistling Ridge Energy Project (Your Reference: KEC-4)

Dear Mr. Montano:

This letter responds to your request for consultation under section 7(a)(2) of the Endangered Species Act of 1973, (ESA) as amended (16 U.S.C. 1531 *et seq.*) on the proposed Whistling Ridge Energy Project LLC (Project). Your biological assessment (BA), dated June 8, 2010, was received by the U.S. Fish and Wildlife Service's (Service) Washington Fish and Wildlife Office on June 9, 2010. You requested concurrence with your determination that the Project "may affect, but is not likely to adversely affect" the threatened northern spotted owl (*Strix occidentalis caurina)* (spotted owl). No designated spotted owl critical habitat occurs on or near the Project; therefore, no critical habitat will be affected.

This letter is based on information provided in the BA, the 2009 Final Report "*Results of Northern Owl, Western Gray Squirrel and Northern Goshawk Surveys Conducted for the Whistling Ridge Wind Energy Project*", the Draft Environmental Impact Statement, a field trip to the Project attended by staff of the Service and the Washington Department of Fish and Wildlife on May 14, 2009, and a meeting between Service and Washington Department of Fish and Wildlife staff on August 28, 2009.

Project Location

The proposed Project is located on private land, approximately 7 miles northwest of the city of White Salmon in Skamania County, Washington. The Project encompasses approximately 1,152 acres of land in sections 5, 6, 7, 8, and 18 of Township 3 North, Range 10 East, and in section 13 of Township 3 North, Range 9 East, Willamette Meridian.

TAKE PRIDE IN AMERICA

Service on May 29, 2009, how to call for spotted owls in light of the numerous barred owl detections north of the Project and was provided the changes to the 1992 surveying protocol prior to the release of the 2010 revised protocol on February 18, 2010). However, in 2010 surveys were continued in the Project area. On May 6, 2010, a single male spotted owl was detected while conducting a night visit in the far north edge of the Mill Creek provincial range on DNR property. On May 7th, the biologist conducted a follow-up visit during the daytime. The bird exhibited non-nesting behaviors. On May 29, the biologist conducted a second visit and located what appeared to be the same male owl that was detected on May 7th. The bird on both survey visits took and consumed mice, indicating that it is a single male not supporting young. Spotted owl survey protocol requires 3 sightings of a spotted owl single within the same area within the breeding season to be regarded as a territorial single. This does not change the analyses of effects of the Project to spotted owls, as addressed below, regardless of whether or not a territorial status is established.

Effects from Construction

Approximately 2 acres of spotted owl dispersal habitat (with some patches of foraging habitat) would be removed from the Moss Creek spotted owl site by the construction of the Project from the northern end of the turbine string. This habitat is located at the southern extremity of the circle and is on the edge of the Project that has already been clear-cut by SDS Lumber Company, and would not remove suitable spotted owl habitat below 40 percent in the territory (J. Spadaro pers. com. 2009). The discovery of the new owl in 2010 in the extreme north of the Moss Creek owl circle is located more than 2 miles northwest of the northern most turbine. Because of this, and since the remainder of the Project does not contain suitable spotted owl habitat, we believe that potential effects to spotted owls as a result of habitat loss or degradation is expected to be insignificant.

Effects from Maintenance

The effects of the operation and maintenance of the Project are anticipated to be minor. Maintenance of the Project would occur primarily around the turbine pads, inside the nacelle (the nacelle is the part of the turbine that houses the generator, transmission gears, and the shaft that turns the generator that, on its opposite end, bolts to the hub that the blades attach to) and the blades. In addition, because the landscape will be maintained as young second-growth forest we do not expect disturbance to nesting owls from maintenance because owls are not likely to nest in these younger forest stands (non-habitat).

Risk of Spotted Owl Collision with Wind Turbines

Bird mortality from collisions with wind turbines is well documented and varies greatly by bird species and flight behavior (Smallwood et al. 2009). Spotted owls are forest-dwelling birds that are strongly associated with older conifer forests. Spotted owls primarily use closed-canopy forested habitats throughout their entire lives for nesting, roosting, foraging, and dispersal (Forsman et al. 1984). Because spotted owls are non-migratory, forest-dwelling owls, they are at much lower risk of exposure to wind turbines than many other bird species, which typically use non-forested upland habitats for foraging and migration.

Other Comments

While reading through the DEIS for this Project, we found some issues that require your attention. On Page 4-4, first paragraph, last sentence "As described in Section 3.4 Biological Resources, no listed species or critical habitat are anticipated to be affected by the Project. This statement equates to a finding of no effect. To the contrary, the biological assessment prepared by BPA made a finding of "may affect, not likely to adversely affect"; hence, the need for this informal consultation.

On page 4-5, 4.5 Migratory Bird Treaty Act, both the interpretation of this Act and the effects of the Project to avian species are in error. Both avian studies and the analyses in Section 3.4 Biological Resources state that many avian species occur within the Project and that some of those individuals will be killed (collisions with blades or tower) and contrary to the statements provided in the Biological effects Section. Within this context, how is it concluded at 4.5, that impacts to migratory birds could only occur through temporary disturbance during construction?

On page 4-5, 4.7 Bald Eagle Protection Act, the last statement "Because the Project would not involve intentional acts or acts in wanton disregard of bald or golden eagles, this Project is not considered to be subject to compliance with the Act.", is an inaccurate statement. Federal Law Enforcement and the U.S Department of Justice decide whether or not an eagle killed by a project is subject to compliance under this Act.

The Service appreciates your efforts to protect listed species and the habitats on which they depend while meeting your mission to provide the public with reliable electricity. If you have any questions regarding this consultation or your responsibilities under the Act, please contact Jim Michaels of this office at (360) 753-7767.

Sincerely,

James L Michaels

for Ken S. Berg, Manager
Washington Fish and Wildlife Office

Michelle, Kayce (COM)

From: Michelle_Romano@fws.gov
Sent: Monday, July 19, 2010 4:58 PM
To: COM EFSEC
Subject: Whistling Ridge Informal Consultation Letter
Attachments: Whistling Ridge Informal Consultation.pdf

Hard copy will be in the mail tomorrow to those that requested a hard copy.

If you have any questions please feel free to let me know.

Sincerely,
Michelle Romano
Office Assistant
WA US Fish and Wildlife Service
360-753-4649

"Be kinder than necessary, for everyone you meet is fighting some kind of battle."

RECEIVED
WR - DEIS
Agency Comment #4
JUL 21 2010
ENERGY FACILITY SITE
EVALUATION COUNCIL

WASHINGTON STATE DEPARTMENT OF
Natural Resources
Peter Goldmark - Commissioner of Public Lands

Caring for your natural resources now and forever

July 19, 2010

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

RE: DNR Comments on Whistling Ridge DEIS

Dear Stephen:

Thank you for the opportunity to review and comment on the joint NEPA SEPA Whistling Ridge draft environmental impact statement (DEIS). We looked primarily at fire hazard, plant species and communities, northern spotted owls and WA Department of Natural Resources' Habitat Conservation Plan (DNR HCP), forest practice requirements, and surface mines and reclamation.

Some of our concerns include: the presence or impacts to Oregon white oak/Idaho fescue plant communities; northern spotted owls, their habitat and associated HCPs; forest practice requirements for this proposal, and a permitted source of aggregate for roads and structures. Our adjacent HCP land to the north is managed to provide habitat that makes a significant contribution to demographic support, maintenance of species distribution and facilitation of owl dispersal. The DEIS on page 3-56 states there are no HCPs in or near the project area. Forest practices owl protection requirements were also not correctly explained. Please also note that state agency wildlife species review is typically done by WA Department of Fish and Wildlife (WDFW), and DNR biologists did not look at impacts to species not protected under the DNR forest land HCP in eastern Washington, other than compliance with Forest Practices Rules.

FPA conversion permits and DNR surface mining reclamation permits (SMRP) are required for timber harvest and rock or gravel mining associated with conversion of forest land and the associated building or construction at the wind tower sites. This was not clear in the DEIS and the SMRP was not listed in Table 4-1. For more details as to DNR concerns and specific requests for DEIS corrections or DEIS additions on the topics noted above please see the following text. Staff contacts are also included for more information or questions.

Fire Hazard

DNR has fire protection responsibility on a significant portion of the land within the project area. After review of the DEIS, we believe that implementation of the fire related mitigation measures listed in Chapter 3, section 3.6.3 of the DEIS (5/1/2010) would adequately address fire prevention responsibility and response on those lands. Thank you for this consideration.

Contact:

Contact:
Darrel Johnston
Phone: (360) 902-2112
darrel.johnston@dnr.wa.gov

Plant Species and Communities

Issues:

- The EIS appears to adequately address 'Special Status Plant Species.' They appear to have queried appropriate sources of information and to have done on-the-ground surveys at the appropriate times. Thank you for this consideration.
- On page 3-43, there is mention of the Oregon white oak/Idaho fescue plant community. However, there is no subsequent mention of it. Was it surveyed for and not found? Was it not surveyed for, because there was no requirement to do so?

Request:

Add a statement(s?) about the Oregon white oak/Idaho fescue plant community on page 3-74 where the impacts to special status plant species are discussed.

Contact:
John Gamon
(360) 902-1661
john.gamon@dnr.wa.gov

Northern Spotted Owls and Associated DNR HCP

Note: State agency wildlife species review is typically done by WDFW. DNR biologists looked at impacts to those species protected under our DNR forest land HCP in the range of the northern spotted owl, not other eastern Washington wildlife species. See also DNR comments as to Forest Practice Rule requirements related to spotted owls in the next DNR comment section.

- Whistling Ridge Energy Project Draft EIS, Page 3-50 states surveys were conducted for northern spotted owl presence in 2008-2009 using the 1992 USFWS survey protocol. No spotted owls were detected during these surveys. Page 3-52 states that the longstanding absence of any northern spotted owls at the historic site centers suggest that these site centers likely no longer qualify for special protection. Page 3-53 states that the Turnstone and DNR/NCASI surveys affirmatively documented the absence of northern spotted owl site centers in these historic sites. They also state that surveys conducted in and near the project area indicate that spotted owls are not present. Additional surveys were conducted during three daytime site visits over the seasonal breeding window in 2009 to determine if spotted owls may be in the vicinity but were not vocalizing due to the presence of barred owls. No spotted owls were detected.

  Comment: It is widely understood that one of the most serious threats facing the northern spotted owl is the recent range expansion of another closely related owl species, the barred owl, ***Strix varia***. Because barred owls may attack and kill spotted owls, spotted owls are

known to vocalize less when around barred owls. This poses a serious problem when the primary means of establishing spotted owl presence is spotted owl vocal response to simulated calls. Hence, vocalization survey results may be unreliable as spotted owls are unlikely to vocalize due to the presence of barred owls, which was the case during the surveys for this project.

Request:

Please note that DNR biologists do not believe that three daytime visits over one season is sufficient evidence to determine that spotted owls are not in the vicinity and are just not vocalizing. Vocalization survey results may be unreliable.

- Whistling Ridge Energy Project Draft EIS, Page 3-56 "A review of USFWS habitat conservation plans issued in the Pacific region indicates there are no spotted owl-related habitat conservation plans applicable in or near the project area." (USFWS 2009b)

  Literature citation: U.S. Fish and Wildlife Service (USFWS). 2009b. Conservation Plan and Agreement Database. Accessed via the Internet at: http://ecos.fws.gov/conserv_plans/public.jsp

  Comment: DNR accessed this website and found the Washington Dept. of Natural Resources HCP identified with 5 listed species covered under this HCP. One of the listed species identified is the northern spotted owl. The area covered under the Washington Dept. of Natural Resources HCP conservation strategy for the northern spotted owl covers DNR managed land directly adjacent to the Whistling Ridge Energy Project to the north.

  Hence, the information provided in the Whistling Ridge Energy Project Draft EIS that "...there are no spotted owl-related habitat conservation plans applicable in or near the project area".... is incorrect.

  Comment: This project may interfere with a spotted owl's ability to disperse from the DNR HCP conservation area to other areas in the vicinity. The state trust lands *HCP Amendment #1 Administrative Amendment to the Northern Spotted Owl Conservation Strategy for the Klickitat HCP Planning Unit,* April 2004 has designated areas for northern spotted owl Nesting, Roosting, and Foraging (NRF) habitat management located directly adjacent to this project's northern boundary. The DNR conservation objective for the northern spotted owl is to provide habitat that makes a significant contribution to demographic support, maintenance of species distribution and facilitation of dispersal.

Request:

Please correct the DEIS text concerning DNR HCP location. You might also reconsider and reword your conclusion that no project impacts are expected to spotted owls.

Contact:

Tami Miketa (360) 902-1481
tamara.miketa@dnr.wa.gov

Forest Practices

Resources at risk by section (from DNR Forest Practices Risk Assessment Tracking GIS data):

- All sections in the proposal are within the Bull Trout overlay delineated in state FP rules (WAC- 222).
- T3N-R10E-S5 There is an F type stream with possible Bull Trout required protections. There are potential unstable slopes indicated.
- T3N-R10E-S6 There is an F type stream with possible Bull Trout required protections. There are potential unstable slopes indicated. There is a Spotted Owl circle.
- T3N-R10E-S7 There is an historic site and there are potential unstable slopes indicated.
- T3N-R10E-S8 There is an historic site.
- T3N-R9E-S12 No issues
- T3N-R9E-S13 There are potential unstable slopes indicated.

Applicable FP rules that may be relevant to the project. Most of these would come into play if there is logging or road building near any waters.

- 222-16-030 Water typing systems
- 222-16-050 Classes of Forest Practices
- 222-20-010 Applications and Notifications
- 222-24-030 Road construction
- 222-24-040 Water crossing structures
- 222-24-052 Road maintenance
- 222-30-020 Harvest unit planning and designs (wetland management zones)
- 222-30-022 Eastern Washington RMZs
- 222-30-050 Felling and Bucking
- 222-30-070 Ground based logging systems.

Comments, concerns and potential mitigation that would be required (for specific DEIS page numbers):

- 2-9, 2-15. Harvesting trees in areas that are not already cleared. This would require an approved Forest Practices Application prior to harvest. Need for Forest Practices Application is already listed in required permits on page 4-3.
- 2-11. The map shows a riparian area. The wetland is described in 3-24. County protection measures are described on 3-39 for category II wetlands.

Request:

If this is on forest land you should verify if it is a Type A or Type B wetland and that the 100 foot buffer would also meet or exceed any FP Rule requirements for a Type A or B wetland (WAC 222-30-020) for that location.

- 3-11. The potential for landslides is described with building of the wind towers. On 3-12, it is stated that there will be no impact to drainages and on 3-12 and 3-13 are mitigation measures.

Request:

Acknowledge that unstable slopes with potential to deliver to public resources would require appropriate protection under forest practices rules to minimize impacts to any

unstable areas and associated public resources and/or public safety. This mitigation requirement is not noted.

- 3-28. Approximately 22 acres of the site will be converted from timber management to non forestry use around the wind turbine sites. All of the Forest Practices Applications that were applied for in the area indicated that the sites would be kept in forestry, not converted to a non-forestry use. This appears to be a violation of the Forest Practices Rules. Potential conversion impacts were not considered. Any future FPAs to harvest trees near wind tower locations will require a conversion FPA (Class IV-General) and any current timber harvesting under current FPAs may be in violation as well. State law (RCW 76.09.460) allows that Skamania County may deny any conversion permits for up to six years on any sites where FPAs were not submitted as conversion FPAs. Under Forest Practices Rules and Regulations (WAC 222-34) DNR requires reforestation to occur on all harvested acres that will remain in forestry.

Request:

All applicable FPAs should be amended or reapplied for to reflect conversion activities (RCW 76.09.470). Any new Class IV-General FPAs must await completion of the final EIS before they can be approved for harvest by DNR.

- 3-50. The comment is made that the project is not sited in or near any Spotted Owls or Spotted Owl activity site centers. There are two Spotted Owl circles within portions of the proposal area.

Request:

Please correct the inaccurate statement concerning spotted owls.

- 3-50 and 3-53. "The two Spotted Owl site centers are no longer considered to be occupied pursuant to USF&W protocols and state law." This is an inaccurate statement. The two Spotted Owl circles are still in the state data base and have not been decertified as of this date. Forest Practices rules and regulations still require appropriate protections (WAC 222-16-080(6)).

Request:

Please correct the inaccurate statement concerning spotted owls and correctly state the appropriate FP Rule mitigation measures that are required.

- 3-75 and 3-78. "The proposal would not impact the White Salmon SOSEA's 40% suitable Spotted Owl habitat level." This is an inaccurate statement. The habitat level is calculated on a circle by circle basis, not over the entire SOSEA. There is a small mapped portion of potential habitat in one of the two circles in the proposal.

Request:

Please document whether this proposal (including all of the associated timber harvests) will harvest suitable owl habitat (WAC 222-16-085) and or impact the suitable habitat totals for one of the spotted owl circles, if that is the case (WAC 222-10-040).

- 3-209 "The Haran Farmstead is recommended as ineligible for the NRHP." This statement may or may not be accurate. This site has been listed in DNR's GIS FP Risk Assessment Tool as a site that may require protection if there is any potential for disturbance to the site. Any potential impacts to the historic site may require a site

protection plan.

Request:

Contact the Washington State Department of Archaeology and Historic Preservation. Document why there will be no adverse impacts or how such impacts can be mitigated with a site protection plan if necessary.

Contact:
Joseph L. Blazek
office: 509-925-0913
cell: 509-856-6465
joe.blazek@dnr.wa.gov

Surface Mines and Reclamation

Issue:

DNR permits and regulates surface mining reclamation on state and private lands. The proposal calls for at least 2.5 miles of new road construction as well as significant improvements and widening of the existing forestry roads to handle the oversized loads not associated with timber management. Since this work as proposed is being performed primarily to facilitate a wind power project, the DNR will not allow the use of aggregate from pits or quarries that do not have an active surface mine reclamation permit.

Request:

Please note that aggregate used to improve/construct roads, or for construction of Whistling Ridge project related foundations and infrastructure must come from a permitted surface mine, not from a forestry pit or quarry locations (exempt/unpermitted surface mine sites).

Contact:
John Bromley
Office (360) 902-1452
Cell (360) 280-7518
Email john.bromley@dnr.wa.gov

For any other general questions regarding these comments please do not hesitate to contact me.

Best Regards,

Simon M. Kihia,
Manager, Environmental Review and Analysis

WR - DEIS
Agency Comment #5

WHITE SALMON VALLEY SCHOOLS

KEY TO THE FUTURE

Jerry A. Lewis, Superintendent
District Office
P.O. Box 157
White Salmon, WA 98672
(509) 493-1500
FAX No. (509) 493-2275

RECEIVED
JUL 26 2010
ENERGY FACILITY SITE
EVALUATION COUNCIL

July21, 2010

Jim Luce
State of Washington
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172

RE: Whistling Ridge Wind Project

Mr. Luce:

The White Salmon Valley School District Board of Directors understands that wind energy farms are potentially divisive, particularly in the Underwood portion of the school district. However, the Whistling Ridge Wind Project would have the effect of broadening the tax base when paying for school levies and bonds.

This project would add approximately $100-$150 million of new taxable value to the school district. It would lower the levy rate for everyone in the district considerably, thereby reducing everyone's taxes, possibly enabling the district to pass future levies more readily.

Using 2010 levy rates, the amount of reduction per thousand dollars of assessed valuation would range from 16 cents to 23 cents. A homeowner with a home assessed at $250,000 would save between $38.00 and $55.00 per year. A homeowner with a home assessed at $500,000 would save between $76.00 and $111.00 per year. Due to unique characteristics of our school district, we have recently lost important statewide levy equalization funds. As a result of this, and the general reductions in statewide education funding, the approval of levies might be an increasingly important source of revenues to our district in the future.

Economically this project has the potential to benefit the community and the school district by adding revenues, without creating additional demands for services or impacts on the school system.

Sincerely

Jerry A. Lewis
Superintendent