



United States
Department of
Agriculture

Forest
Service

Columbia River Gorge
National Scenic Area

902 Wasco Ave., Suite 200
Hood River, OR 97031
541-308-1700
FAX 541-386-1916

RECEIVED

AUG 25 2010

File Code: 2380

Date: August 23, 2010

ENERGY FACILITY SITE
EVALUATION COUNCIL

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

Dear Mr. Posner:

Thank you for the opportunity to review the Draft environmental Impact Statement (DEIS) for the Whistling Ridge Energy Project.

The project has many positive features and will make a positive contribution to the region. The National Scenic Area supports renewable energy development and believes that the Whistling Ridge Energy Project will be enhanced with consideration given to the scenic values associated with the Columbia River Gorge National Scenic Area (CRGNSA).

As described in your analysis on Table 3.9.2 (Viewpoints 13 and 14) the Columbia River gorge has moderately high to high levels of visual quality. Visitors and residents within the gorge place a high value on scenic quality and viewer sensitivity is substantially higher than described in the DEIS. As such, I would ask that you consider potential scenic effects throughout project design and implementation. Considerations such as turbine placement, color and size through project design and implementation will help to ensure scenic quality, as viewed from within the CRGNSA, will be maintained and/or scenic modifications minimized.

Sincerely,

DANIEL T. HARKENRIDER
Area Manager



Michelle, Kayce (UTC)

From: Addison Jacobs [AJacobs@Portvanusa.com]
Sent: Friday, August 20, 2010 8:11 AM
To: EFSEC (UTC)
Subject: Wind Energy Letter from the Port of Vancouver
Attachments: Wind Energy Letter.pdf

To Whom It May Concern:

Please see attached letter in support of wind energy business. This is forwarded at the request of Jason Spadaro of the SDS Lumber Company.

Addison Jacobs
Director of Public Affairs
3103 NW Lower River Road, Vancouver, WA 98660
Direct: 360.992.1116 | Cell: 360.518.2017
ajacobs@portvanusa.com | www.portvanusa.com



Port of Vancouver, USA
Welcome to the Port of Possibility



Port of Vancouver USA

August 18, 2010

To Whom It May Concern:

The Port of Vancouver is an active participant in regional and national associations promoting alternative energy, particularly wind energy. We support alternative energy credit programs and state and national alternative energy standards. In addition, the port advocates for the expansion of the wind energy grid in the Pacific Northwest and nationwide.

Over the last five years wind energy cargoes have contributed to the diversification of cargoes at the Port of Vancouver, expanding overall revenues and stabilizing income through the tough economic times. Two large mobile harbor cranes acquired during this time have greatly enhanced the port's ability to attract and support the growth of the wind energy logistics trade. In 2009 alone the port handled 2,700 pieces of wind energy business, generating 55,897 labor hours.

Wind energy business means jobs and economic return for our community in southwest Washington. For this reason, the Port of Vancouver intends to continue its active role in the receipt and delivery of component parts for the wind energy business well into the future.

Sincerely,

Larry Paulson
Executive Director

Michelle, Kayce (UTC)

From: Amanda Hoey [amanda@mcedd.org]
Sent: Thursday, August 19, 2010 10:32 AM
To: EFSEC (UTC)
Subject: Fwd: Whistling Ridge
Attachments: jason spadaro RE letter 0610.pdf

Attached is Mid-Columbia Economic Development District's letter regarding renewable energy projects. As requested, we are sending this along.

"Mid-Columbia Economic Development (MCEDD) supports the utilization of our renewable energy assets to diversify our economy and stabilize our economic base. We support development of wind, solar, biomass, geothermal, and other renewable energy projects in our region which are designed in a manner consistent with local regulations.

MCEDD has supported the creation of the Columbia Gorge Bi-State Renewable Energy Zone as a means to engage in a cross-jurisdiction, inter-agency, bi-state collaborative approach to renewable energy development. In establishing the Columbia Gorge Bi-State Renewable Energy Zone, we took into consideration a variety of factors, all linked by the regional economy. These include the renewable energy resource itself (wind, solar, hydro, geothermal, biofuels, and biomass), financial investment in those resources by renewable energy industry, existing transportation networks (roads, rail, river and air), high-speed telecommunications networks, education and workforce training capacity, public utilities, resident workforce, transmission capacity, industrial lands base, and quality of life. The economic benefits of renewable energy projects can provide a base for connecting all these components into a networked system that would generate familywage employment in a rural, traditionally depressed economy"

Amanda

--

Amanda Hoey
Executive Director
Mid-Columbia Economic Development District
515 East 2nd Street
The Dalles, OR 97058
541-296-2266
www.mcedd.org



June 14, 2010

Jason Spadaro
SDS Lumber Company
P.O. Box 266
Bingen, WA 98605

Dear Jason,

Mid-Columbia Economic Development (MCEDD) supports the utilization of our renewable energy assets to diversify our economy and stabilize our economic base. We support development of wind, solar, biomass, geothermal, and other renewable energy projects in our region which are designed in a manner consistent with local regulations.

MCEDD has supported the creation of the Columbia Gorge Bi-State Renewable Energy Zone as a means to engage in a cross-jurisdiction, inter-agency, bi-state collaborative approach to renewable energy development. In establishing the Columbia Gorge Bi-State Renewable Energy Zone, we took into consideration a variety of factors, all linked by the regional economy. These include the renewable energy resource itself (wind, solar, hydro, geothermal, biofuels, and biomass), financial investment in those resources by renewable energy industry, existing transportation networks (roads, rail, river and air), high-speed telecommunications networks, education and workforce training capacity, public utilities, resident workforce, transmission capacity, industrial lands base, and quality of life. The economic benefits of renewable energy projects can provide a base for connecting all these components into a networked system that would generate family-wage employment in a rural, traditionally depressed economy.

Sincerely,



Amanda Hoey
Executive Director

Michelle, Kayce (UTC)

From: Posner, Stephen (UTC)
Sent: Thursday, August 26, 2010 7:26 AM
To: Michelle, Kayce (UTC)
Cc: Talburt, Tammy (UTC)
Subject: FW: Ecology SEPA No. 10-2884A "Whistling Ridge project" Comment Letter
Attachments: Enclosure.pdf; 10-2884A.pdf

Importance: High

Kayce,

Please process. Thanks.

Stephen Posner
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172
(360) 956-2063
stephen.posner@utc.wa.gov

*W.R. Dept. of Ecology comment
see Agency Comment #9
in database*

visit the EFSEC website at: [www.efsec.w](http://www.efsec.wa.gov)

From: Posner, Stephen (COM)
Sent: Wednesday, August 25, 2010 2:00 PM
To: Posner, Stephen (UTC)
Subject: FW: Ecology SEPA No. 10-2884A "Whistling Ridge project" Comment Letter
Importance: High

From: Mendoza, Sonia (ECY)
Sent: Wednesday, August 25, 2010 2:00:19 PM
To: ammontano@bpa.gov; Posner, Stephen (COM)
Cc: Chen, Qing (ECY); Cline, Vicki (ECY); Drumright, Mike (ECY); Groven, Connie (ECY); Toteff, Sally (ECY)
Subject: Ecology SEPA No. 10-2884A "Whistling Ridge project" Comment Letter
Importance: High
Auto forwarded by a Rule

Mr. Montano and Mr. Posner,
Attached is our comments for the Whistling Ridge project (Ecology File Nos. 10-2884A).
Comments are due 8/27/10.

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



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 Fisksdal, 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

May 13, 2009

Page 2

pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Proper disposal of construction debris must be on land in such a manner that debris cannot enter buffers and waters of the state or cause water quality degradation of state waters.

During construction, all releases of oils, hydraulic fluids, fuels, other petroleum products, paints, solvents, and other deleterious materials must be contained and removed in a manner that will prevent their discharge to waters and soils of the state. The cleanup of spills should take precedence over other work on the site.

Clearing limits and/or any easements or required buffers should be identified and marked in the field, prior to the start of any clearing, grading, or construction. Some suggested methods are staking and flagging or high visibility fencing.

A permanent vegetative cover should be established on denuded areas at final grade if they are not otherwise permanently stabilized.

All temporary erosion control systems should be designed to contain the runoff from the developed two year, 24-hour design storm without eroding.

Coverage under the National Pollution Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction Activities is required for construction sites which disturb an area of one acre or more and which have or will have a discharge of stormwater to surface water or a storm sewer. An application can be downloaded from Ecology's website at <http://www.ecy.wa.gov/programs/wq/stormwater/construction/#Application> or you can contact Josh Klimek at (360) 407-7451 for an application form. To avoid project delays, we encourage the applicant(s) to submit a completed application form and to publish public notice more than 60 days before the planned start of the project.

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: 09-2310)

cc: Connie Groven, TCP
Sarah Lukas, SEA
Brett Raunig, VFO/WQ
Joyce Smith, HQ/WQ
Roberta Woods, WQ
Whistling Ridge Energy LLC (Proponent)



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 25, 2010

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

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

Dear Mr. Montañó and Mr. Posner :

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

AIR QUALITY: Qing Chen (360) 407-6809

Best Management Practice for minimization of track out and windblown dust should be required in applicable permitting.

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.

WASTE 2 RESOURCES: Mike Drumright (360) 407-6397

All grading and filling of land must utilize only clean fill, i.e., dirt or gravel. All other materials, including waste concrete and asphalt, are considered to be solid waste and permit approval must be obtained through the local jurisdictional health department prior to filling. Standards apply as defined by Washington Administrative Code (WAC) 173-350-990-Criteria for Inert Waste.

Property owners, developers, and contractors are encouraged to recycle all possible leftover construction, demolition, and land clearing (CDL) materials and reduce waste generated. Recycling construction debris is often less expensive than landfill disposal. Please visit <http://1800recycle.wa.gov> or call the 1-800-RECYCLE hotline to find facilities that that will accept your CDL materials for reuse or recycling.

WATER RESOURCES: Vicki Cline (360) 407-0278

All water wells shall be constructed in accordance with the provisions of Chapter 173-160 WAC by a driller licensed in the State of Washington. Well reports must be submitted to Ecology within 30 days after completion of a well.

August 25, 2010

Page 2

All water wells that may be drilled must be a minimum of 100 feet from any known, suspected, or potential source of contamination. Wells shall not be located within 1,000 feet of a solid waste landfill. WAC 173-160-171(1) The proposed water well shall be located where it is not subject to ponding and is not in the floodway, except as provided in Chapter 86.16 RCW. (2) It shall be protected from a one hundred year flood and from any surface or subsurface drainage capable of impairing the quality of the ground water supply.

The Growth Management Act (Section 63) requires an applicant to submit evidence of an adequate water supply before a building permit can be issued for any building requiring potable water.

Any ground water withdrawals anticipated exceeding 5,000 gallons a day for domestic uses or for commercial/industrial uses require a water right permit. Any modification to existing water rights must be approved by Ecology's Water Resources Program.

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: 10-2884A)
Enclosure

cc: Qing Chen, AQP
Vicki Cline, WR
Mike Drumright, W2R
Connie Groven, TCP

LATE Agency Comment #10
Replaces Public Comment #541
At Submitters Request



State of Washington
Department of Fish and Wildlife

Mailing Address: 600 Capitol Way N, Olympia WA 98501-1091, (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

September 17th, 2010

Stephan Posner
EFSEC
905 Plum Street SE
Olympia, Washington 98504-3172
efsec@commerce.wa.gov

SUBJECT: Whistling Ridge Energy Project Draft Environmental Impact Statement: EFSEC Application 2009-01

Dear Mr. Posner,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced documents and offer the following amended comments at this time. This letter replaces the previously submitted August 27th, letter from WDFW. Other comments may be offered as the project progresses.

WDFW has carefully reviewed the habitat evaluation prepared by the applicant. The Whistling Ridge Wind Resource Area (WRWRA) is a forested site managed for over 100 years. It is not in a natural or native coniferous forest condition. The pre-project assessment and avian/bat use surveys are consistent with standard protocols utilized throughout the U.S. and are consistent with the WDFW Wind Power Guidelines (WDFW 2009). Because the relationship between avian use and mortality has been reasonably consistent across other habitat types and locations, it is likely that the relationship between avian use and mortality would be similar to that evaluated in other projects. While no similar data exist for constructed wind energy projects in managed coniferous forest habitats that might help inform impact predictions for Whistling Ridge, as we previously confirmed in the attached letters, WDFW confirms that these data represent the best available science for predicting avian impacts at Whistling Ridge. Therefore, if the WRWRA is constructed, WDFW anticipates the opportunity to better understand the relationship between wind energy development in western coniferous forests and wildlife response.

WDFW would like to emphasize that fluctuations in raptor populations, as well as other avian species, may result in greater mortality than what is predicted in the *Final Report*. As a result, operational controls may be necessary to address avian mortality that exceeds predicted mortality.

In closing, WDFW would like to acknowledge that the applicant has submitted a preliminary mitigation plan that we are currently reviewing. This mitigation proposal was developed consistent with the WDFW Wind Power Guidelines at a 2:1 replacement ratio. The preliminary mitigation plan encompasses approximately 100 acres in Klickitat County 12 miles due east of the project site. The mitigation site is forested with Oregon White Oak with some Douglas fir and Ponderosa pine and shares a portion of its northern boundary with 40 acres of WDNR land and. This mitigation site provides habitat for several PHS entries including Western gray squirrels. Additionally, the site includes the fish-bearing Silva Creek, a tributary to the Klickitat River.

We look forward to working with the applicant as this project moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Nelson".

Travis Nelson
Renewable Energy Section Manager

Talbert, Tammy (UTC)

Subject: FW: Whistling Ridge Amended Comments WDFW
Attachments: WR.SDS.DFW.9.17.10.pdf; DFW.DEIS.WR.COMMENT.1.19.10.pdf;
DFW.CLARIFICATION.9.22.09.pdf

From: Nelson, Travis W (DFW)
Sent: Friday, September 17, 2010 4:10 PM
To: Posner, Stephen (UTC)
Subject: RE: Whistling Ridge Amended Comments WDFW

Stephen,

Please see attached amended letter and previously submitted letters.

Travis Nelson
WDFW - Renewable Energy Policy
360.902.2390
Travis.Nelson@dfw.wa.gov



State of Washington
Department of Fish and Wildlife

Mailing Address: 2620 North Commercial Avenue (509) 543- 3319
Main Office Location: 2620 North Commercial Avenue – Pasco, WA 99301

MWR-01-10

January 19, 2010

Katy Chaney
URS Corporation
Century Square
1501 4th Avenue, Suite 1400
Seattle, WA 98101-1616

SUBJECT: Preliminary Draft Environmental Impact Statement (DEIS), Whistling Ridge Energy Project

Dear Ms. Chaney:

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above reference document and offers the following comments at this time. Other comments may be offered as the project progresses.

Overall, the Preliminary DEIS is consistent with the 2009 WDFW Wind Power Guidelines, including early and regular consultation, as well as avian and bat studies, habitat characterization, and impact analysis.

WDFW is in agreement with the following excerpt from *Section 3.0 Affected Environment*:

“For permanent impacts to vegetation and habitat, the Section 8.2 of the Wind Power Guidelines (WDFW 2009) recommend mitigation be tailored to specific classifications. The project is located within the classification for “Forestry,” which are those commercial forested areas defined and regulated under the Forest Practices Act. Minimization of conversion of forested areas is suggested, and consultation with WDFW is the only recommended mitigation. No form of acquisition, restoration or conservation of lands is suggested by the guidelines.”

However, we would like to further discuss the proposal as it relates to the table in Section 8.2 of the 2009 WDFW Wind Power Guidelines mitigation for both temporary and permanent impacts.

We support the two-year minimum post-construction avian mortality study, as well as the development of a Technical Advisory Committee (TAC)

WDFW is in general agreement with the proposed commercial forestry operations within the vicinity of each turbine as described in Section 3.0 ("turbine timber buffer") and would like to offer the following interpretation.

According to Section 3.0, "Vegetation surrounding each turbine would be managed according to the following specifications:

- A circular area extending 50 feet from each turbine tower base would be harvested and graveled
- From 50 feet to 150 feet from the base of the turbine towers, tree heights would be limited to 15 feet above the elevation of the base of the turbine
- From 150 feet to 500 feet from the base of the turbine towers, tree height would be limited to 50 feet above the turbine base within an area formed by a 90 degree arc centered on the ordinary downwind direction."

From this, we conclude that within a diameter of 100 to 300 feet surrounding each turbine, tree heights would be limited to 15 feet, and from a diameter of 300 to 500 feet, tree heights would be limited to 50 feet, but only within a 90-degree arc on either side of the turbine aligned with the direction of the prevailing wind. The other 90-degree arc on either side of the turbine perpendicular with the direction of the prevailing wind will essentially be unchanged habitat (i.e. existing commercial forest). We are interested in how this type of habitat and commercial forest management in the immediate vicinity of operating wind turbines will or will not affect the avian and bat mortality. We look forward to working with Whistling Ridge through the TAC to address this issue and cooperatively develop management strategies, if needed, to reduce avian and bat mortality.

Thank you for the opportunity to review the Preliminary DEIS and offer these comments.

Sincerely,

A handwritten signature in black ink that reads "Michael Ritter". The signature is written in a cursive, flowing style.

Michael Ritter
Wind Mitigation Biologist



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 800 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

September 22, 2009

Mr. Jason Spadaro
SDS Lumber Company
Post Office Box 266
Bingen, Washington 98605

Dear Mr. Spadaro:

Thank you for your letter dated August 21, 2009, concerning the Whistling Ridge Energy Project. You requested clarification on several specific issues raised in correspondence from the Washington Department of Fish and Wildlife (WDFW) on May 14, 2009, and June 11, 2009.

You are concerned that the letters from WDFW provided an incomplete and inaccurate analysis of wildlife data that has been collected for the proposed project since 2003, and that our conclusions regarding potential project impacts to birds and bats are unwarranted and unsubstantiated. It is my goal to provide clarification to our previous letters that will allow you to continue to develop your proposal for this wind power project, at Whistling Ridge, using our Wind Power Guidelines.

You raised concern of how receptive WDFW is to Best Available Science (BAS) and its application to the project. WDFW views BAS as an integral component of your project assessment, therefore, we will consider all current and future BAS related to your existing and future proposals and review the findings objectively. Your supplemental information concerning goshawks, spotted owls and other avian species and Western grey squirrel use of the project site that you included in your August 21 letter, fits this definition of BAS. We will use this information to refine our analysis of the impacts of this project. Our analysis will focus on current habitat conditions and species presence. We will also treat any additional information you may submit in the future as BAS.

I acknowledge projections of post-construction bat mortalities that we made, that were based on pre-construction activity levels, are not necessarily a good predictor of numbers of post-construction mortalities; they only provide an indicator of relative risk, as documented at other wind farms around the country. Pre-construction activity levels are also important as a

Jason Spadaro
September 22, 2009
Page 2

guide to avoid and minimize collisions (post-construction) through the placement of the wind turbines, and to assess the potential length of post-construction fatality studies.

I am encouraged by your commitments to adaptive management for this project and am certain we will agree on a plan that will ensure that avoidance, minimization, and/or mitigation goals are met once the project is completed.

I look forward in working with you to get on track and to continue towards building a collaborative working relationship and to assist you in developing a proposal for the Whistling Ridge Energy Project that will be protective of wildlife.

Sincerely,

A handwritten signature in cursive script, appearing to read "Greg Hueckel".

Greg Hueckel, Assistant Director
Habitat Program

cc: Governor Christine Gregoire
Phil Anderson, WDFW Director
Allen Fiksdal, EFSEC Siting Manager