Scoping Comment
#333

GORGE VIEW BED & BREAKFAST
1009 Columbia St., Hood River, OR 97031 Tel.(541)386-5770

May 13, 2009

Allen J. Fiksdal
EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172

Dear Mr. Fiksdal,

I am writing to comment on the proposed wind farm, Whistling Ridge Energy Project in Skamania County. As a local business owner and City Councilor I am very aware of the balances required to support our green energy options while also supporting the prime industries of the Gorge, such as tourism, agriculture and forestry.

After reviewing the recent proposal, I am writing to request that the EFSEC deny this proposed construction of a wind farm that would allow up to 50, 426 ft tall wind turbines.

Hood River's number one industry is tourism and much of that is the draw of the wonderful natural beauty created by the protection offered though the Gorge National Scenic Act. One hundred and fourteen miles of wind turbines with flashing red lights on Saddle Back Mountain, (some of which are even in the Scenic Area), and visible from Hood River, White Salmon and Interstate 84, would be completely adverse to the purpose of the Scenic Act. Instead we would have an industrial site with towers and electrical lines highly visible night and day.

I also understand this is a highly forested area, rich in wild life and even two or three federally protected species. This proposal which includes miles of new roads, and cutting down 80 to 100 year old trees, clearing brush, and installing concrete pads would likely have a large adverse impact on this heavily forested area.

We now have a large problem here in Eastern Oregon with the noise complaints for those living and working near wind turbines. I understand that the average turbine noise is that of a person speaking in normal tones for twenty four seven, which is much more annoying than what they were originally told.

The Columbia River Gorge is a national scenic treasure. I strongly urge you to deny the proposed wind farm construction and protect this National Scenic Area as Congress intended.

Kind Regards,

Ann Frodel

Scoping Comment #334

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Whistling Ridge Energy Project
May 6, 2009, Stevenson, WA
May 7, 2009, Underwood, WA

Public Informational &
Environmental Impact Statement Scoping Meeting

Name: Glenda Ryan

Address: [redacted] Underwood, Wa. 98651
(Please include your Zip!)

Please write any comments you have with respect to the proposed Whistling Ridge Energy Project below and leave this sheet in the Comment Box.

Dear Council,

The Whistling Ridge Energy Project as proposed is inappropriate in the rural residential neighborhood of Underwood. I have concerns about the impact on our rural roads; major road reconstruction will have to take place to accommodate the large construction equipment necessary to build this project.

My biggest concern is the amount of water needed for this project; water use to reduce dust on the roads, but more importantly the amount needed to mix cement for the many concrete footings.
We have a spring fed water system which during heavy use is depleted and takes time to recharge.
Our exposure to wildfire makes it necessary to have a reliable source of water.
The ongoing water problems of our neighboring community of White Salmon, Wa. makes this an issue that cannot be ignored.

The "Cedar Swamp" northeast of the proposed site is a possible water source, but is also a very important wetland area for the many animals (deer, elk, cougars, & birds) that live on Underwood Mountain.

This area is designated as a National Scenic Area and very strict rules apply to those of us living within the scenic area. I realize this project is outside the boundary of the scenic area, and technically meets the legal requirements. The project may be outside the scenic area, but it has a very large impact on the National Scenic Area and those of us living within those boundaries.

Though I understand and support the need for renewable energy, there are many wide open, unoccupied areas in eastern Washington that could better accommodate wind turbines. Those areas should be utilized first before we consider industrial wind projects in residential communities.

Thank you for your consideration in this matter.
Sincerely,

Glenda Ryan

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Scoping Comment #335

Whistling Ridge Energy Project
May 6, 2009, Stevenson, WA
May 7, 2009, Underwood, WA

Public Informational &
Environmental Impact Statement Scoping Meeting

Name: Matt Ryan

Address: [redacted], Underwood Wash 98651
(Please include your Zip!)

Please write any comments you have with respect to the proposed Whistling Ridge Energy Project below and leave this sheet in the Comment Box.

Dear Council,

I have attended several meetings and done other research regarding the Whistling Ridge Energy Project (WREP) and feel the siting of this project is inappropriate. Proximity to numerous residential areas, water use issues, visual impacts from both turbines and navigation lighting, potential negative impacts for local agri-business and property values- these are just some of the many important reasons voiced during the public meetings which question the wisdom of siting a major energy project of this magnitude in this area. For these reasons I oppose the WREP.

From the data I have reviewed, most objective commentators recommend a 2 mile set-back from habitable dwellings for large scale wind turbine installations. Many residences fall within this set back area and have a significant chance of negative health effects if this project is approved.

While I oppose the siting of this project in it's entirety, I also understand we all need to be part of the solution to the challenges facing us as we look to alternative forms of energy. I support alternative energy development, but it must be done in a responsible manner. There is a lot of potential sites for wind, solar, and other new energy developments in Washington that are not near residential areas- lets explore these sites before we start building on top of existing communities.

I oppose this project, but I also realize we all need to help with our energy needs of the future. In the spirit of compromise, I would propose that if this project is approved, the seven most southerly turbines (the so-called "A Group") be eliminated or moved to the north end of the project. This "A Group" removal would allow for a reasonable set back for those property owners most affected, and would have a positive influence on the overall visual impacts to the scenic area. I realize this project is outside the boundary of the scenic area, and technically meets the legal requirements. But the boundaries were drawn with the reasonable assumption that dozens of skyscraper-height structures would not be built in the middle of the forest. This project may meet the letter of the law, but would certainly break the spirit of the Scenic Act.

Sincerely,

Matthew J. Ryan

Scoping Comment
#336

Washington State Energy Facility Site Evaluation Council

COMMENT FORM

Whistling Ridge Energy Project

Public Informational & Scoping Meeting – Skamania County, Washington, May 6 & 7, 2009

Name: Ms. Arlene Bradford

Address: [redacted]
Underwood, WA 98651

Arlene Bradford

(Please include your Zip!)

Please write any comments you have with respect to the Whistling Ridge Energy Project Informational & Scoping Comments

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, May 18, 2009.

Please see attached.

RECEIVED
MAY 18 2009
ENERGY FACILITY SITE
EVALUATION COUNCIL

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:
Jim La Spina, EFSEC Siting Specialist, PO Box 43172, Olympia, WA 98504-3172,
call (360) 956-2047, or e-mail efsec@cted.wa.gov.

Whistling Ridge Energy Project comments:

As a PROPONENT for this project (with no connections or personal contact with anyone from SDS) I offer the follow brief comments in response to those who oppose on the following grounds:

VIEW: We have lived on Underwood Mountain for 17 years. The view has changed dramatically, which we knew we must accept. On the attached page, please see the changes we have witnessed. Vineyards are not pretty things, especially in the first few years. The destruction of the orchards in front of our house has dramatically altered the attractiveness of the view, most of the time in the last six years, resembling Arlington National Cemetery with its white grow tubes and posts lined in a row.

The view, across the river to Hood River, has been vastly changed with new housing developments, red and yellow condominiums, Wal-Mart, etc. all allowed under the NSA as an exempt area. The area of the proposed wind farm is also not covered under the NSA.

HAZARDOUS MATERIALS: We watch, several times a year, as the orchards and vineyards within our scope (several acres) are sprayed by workers wearing Hazmat suits and full protective face gear. We close our windows, bring in our pets and wait for the pesticide smell to go away. Oregon and SW Washington have the highest breast cancer rates in the nation (check several sites on internet, including the Susan B. Koman Breast Cancer site). All pesticides cause a type of cancer (EPA) and most farms in our area are not organic. This is all **within** the NSA! I cannot believe that SOSA or the "Friends" group would consider concrete, steel and fiberglass hazardous to the health of those miles away or even next door. They would be better worrying about the diesel fumes and storage at their agricultural sites.

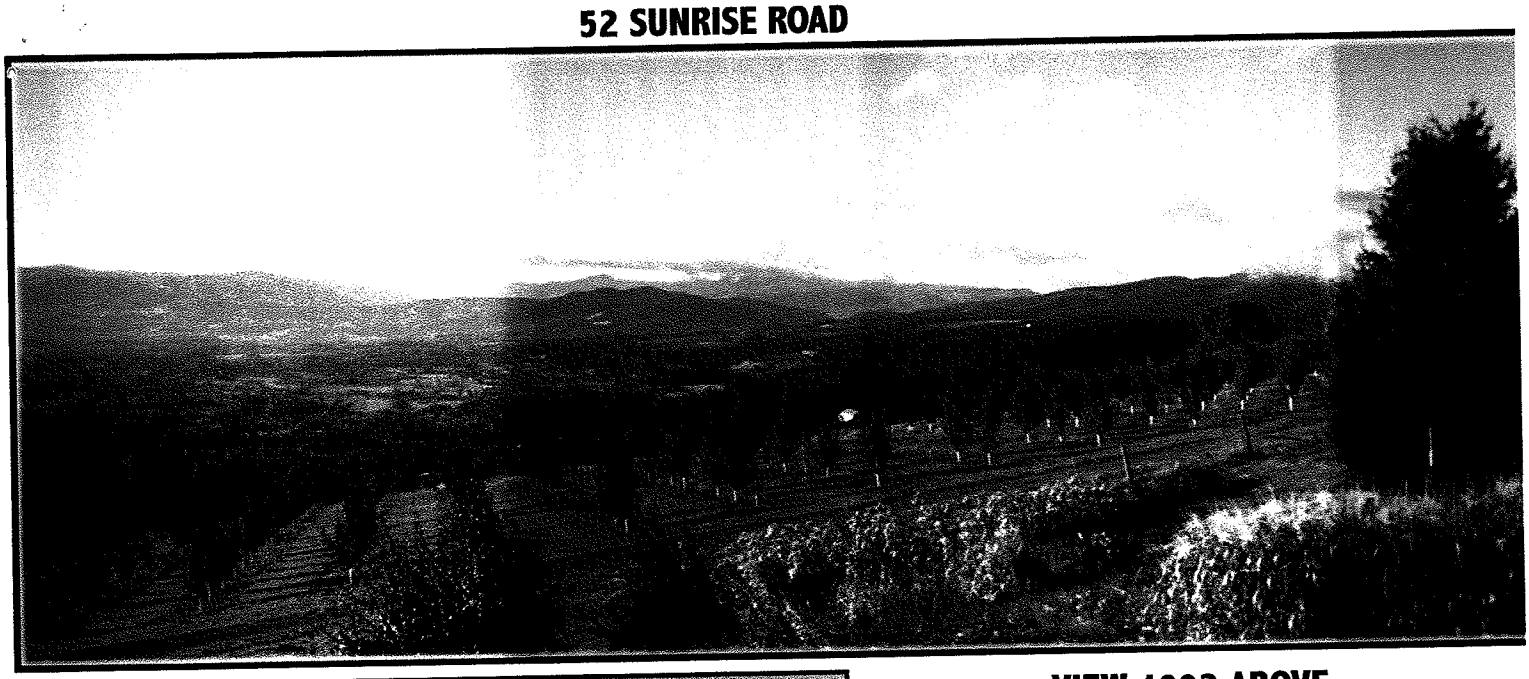
OTHER OBJECTIONS: Vibration, noise, wildlife kills, etc. are invalid and proven not problematic. Vibration would mean equipment malfunction and an expense the owners would correct immediately. Last weekend we carried out a very normal conversation right under one of the wind turbines in operation near Rufus without raising our voices.

PROPERTY VALUES: In the 17 years we have lived here, our home and land value has increased 165% while our taxes increased 206%. East Skamania county has no industry or tax-relief allowable sites to date. The only group benefiting from the growing recreational use in the NSA are the businesses in Hood River – hotels, restaurants and sports' rental agencies. We here, in Underwood, have been allowed no benefits and must pay for the cleanup of their use on our side of the river.

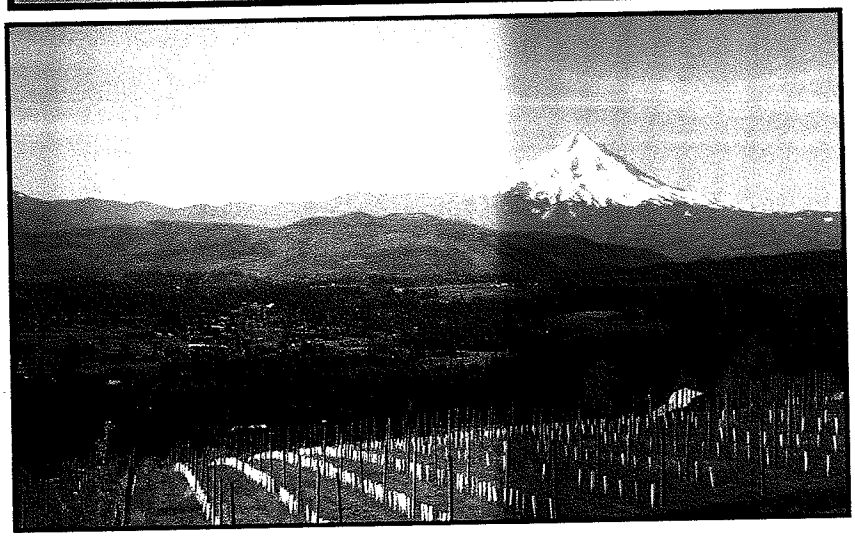
Arlene E. Bradford
[redacted]
Underwood, WA 98651 [redacted]@gorge.net
(509) 493-[redacted]

Arlene E Bradford

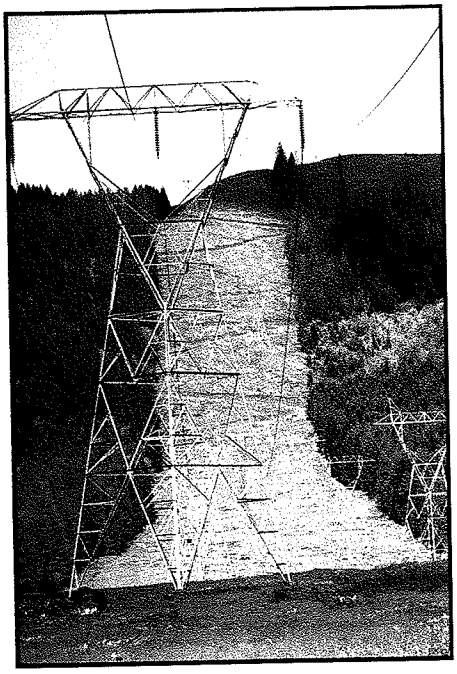
52 SUNRISE ROAD



VIEW 1992 ABOVE



VIEWS 2009 ABOVE



VIEWS FROM MILL A - WITH TWO SETS OF POWER LINES AND CLEAR CUTTING ALREADY IN PLACE FOR YEARS

Scoping Comment
#338

Bhavnani, Monica (CTED)

From: john mcintosh [redacted]@yahoo.com]
Sent: Monday, May 18, 2009 11:47 AM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. The potentially affected species include northern spotted owl, western gray squirrel, northern goshawk and other raptors, several species of bats, multiple migratory bird species, mule deer, black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

Locating 426-foot-tall turbines on the ridgeline of the Columbia River Gorge would also degrade the scenic values of the Gorge. The turbines would be highly visible from several designated key viewing areas within the National Scenic Area, including Interstate 84, the Historic Columbia River Highway, Cook-Underwood Road, and Panorama Point. The project would introduce highly visible industrial facilities into the natural, forested landscape, protruding above ridgelines and detracting from the natural scenic beauty of the Gorge. The wind towers would have daytime and nighttime warning lights, which would worsen the aggravate scenic impacts.

Finally, the proposed project would be located partially within the Columbia River Gorge National Scenic Area. Specifically, the applicant proposes to construct, expand, and improve more than two miles of roads within the National Scenic Area in order to haul industrial materials with gross vehicle weights of up to 53 tons. This proposal to construct and use Scenic Area lands for industrial purposes is prohibited by the National Scenic Area Act and Management Plan, and must be denied.

I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

john mcintosh
[redacted]
portland, OR 97221

Scoping Comment #339

Bhavnani, Monica (CTED)

From: Jerry Powers [redacted]@hughes.net]
Sent: Monday, May 18, 2009 11:53 AM
To: CTED EFSEC
Subject: Whistling Ridge Energy Project

Dear Sirs

We are a retired couple who took their life savings and built a retirement home in the mountains free of noise and light pollution approximately two miles from the proposed site for these wind mills. Now in our beautiful area with the animals and birds you want to add noise and lights to upset our area. We oppose this site because of the our national scenic area will be upset.

Jerry and Brenda Powers

Scoping Comment
#340

Bhavnani, Monica (CTED)

From: North Cheatham [redacted]@gorge.net]
Sent: Monday, May 18, 2009 12:05 PM
To: CTED EFSEC
Subject: Whistling Ridge Energy Project comments

Dear Mr. Fiksdal,

I have read the introduction of the Whistling Ridge application to construct a 75 MW Wind energy facility just west of White Salmon WA, and I am familiar with the area, being a resident of Hood River OR.

I support this project, provided that the completed environmental studies safeguard or minimize adverse affects to threatened or endangered species. Key benefits of the project as I see it include providing substantial short term construction employment in an economically depressed area, use of existing, strategically placed BPA power lines that would otherwise be extremely difficult and expensive to access, providing clean, renewable power to help avert global warming, and the project's proximity to the greater Portland/Vancouver area. It does not bother me that the project would be sited just outside the Columbia Gorge National Scenic area, as long as the turbines are not actually inside the Scenic Area.

Somewhere I once read that the highest measured annual wind speed in the state of Washington was in this vicinity; given all the other advantages, I can see no reason not to exploit this resource in an environmentally sensitive fashion. Those who object to the appearance of wind turbines on the ridge tops above the National Scenic Area do not fully comprehend or appreciate the shocking advance of the detrimental effects of global warming. This is no time to fall back on the "not in my back yard" (NIMBY) argument. The North Polar Ice Cap is already 45% reduced from its size in 1980, and may be completely gone in late summer as early as 2030, according to National Geographic. Similar, but less dramatic effects are readily apparent by the recession of glaciers on our own northwest volcanos. If significant emission reductions are delayed 1 -5 years or more, by not building out wind power projects in favorable sites like Whistling Wind as rapidly as possible, it will be very difficult to prevent global temperatures from exceeding 3.6 degrees F. This change would produce significant economic, social, political, and environmental disruptions.

Collectively, our power consumption is increasing in the order of 1.1 - 1.3% annually, according to the US Department of Energy. We need the additional power Whistling Wind would contribute, we need it produced from environmentally benign sources, and we need it now. Washington's Renewable Energy Portfolio would be well served by this project.

Please approve the Whistling Wind Energy Project.

North Cheatham
541/386-[redacted]
[redacted]
Hood River OR 97031

Scoping Comment
#341

Bhavnani, Monica (CTED)

From: Ritter, Michael W (DFW)
Sent: Monday, May 18, 2009 12:14 PM
To: CTED EFSEC
Cc: Applegate, Brock A (DFW); Nelson, Travis W (DFW)
Subject: EFSCE 2009-01, Whistling Ridge
Attachments: WHISTLING.RDGE.MWR-07-09 .doc

Attached are WDFW comments on EFSEC Application 2009-01

Hard Copy via USPS

Michael Ritter
Wind Mitigation Biologist
Washington Department of Fish and Wildlife
[redacted]
Pasco, WA 99301

State of Washington
Department of Fish and Wildlife
Habitat Program - Major Projects Division - Wind and Water Energy Section

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

MWR-07-09

May 14, 2009

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172

SUBJECT: Whistling Ridge Windpower Project, EFSEC Application No. 2009-01

Dear Mr. Fiksdal:

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

General Comments

Based solely on the data contained in the application, and subsequent data that will likely be presented in the EIS, the proposed Whistling Ridge Wind Energy Project could have adverse impacts to birds and bats. Therefore, WDFW recommends additional studies, as identified in section 2.17.2, specifically, northern goshawk and bat surveys. However, it is uncertain that the additional data on northern goshawks, northern spotted owls, and bats coupled with the existing avian and bat data will alleviate WDFW_concerns with potential impacts to birds and bats with this wind energy project. The habitat is predominately managed coniferous forests, a characteristic that has likely resulted in the high raptor, bat, and bird use/occurrence recorded at this site, and a habitat type that has little to none avian and bat data, impacts, and conclusions associated with wind energy development.

There is a lack of comparable wind power projects in coniferous forests any where in the U.S. from which we can assess preconstruction avian and bat data with operational fatality. However, based on the data and statements such as, "thus, based solely on the

presumed relationship between pre-construction bat activity and post-construction fatalities, bat mortality rates at SWRA may be higher than many other wind resource areas in the U.S" and "based on data collected during this study, raptor use of the Saddleback project area is...moderate to moderately high compared to most other WRAs evaluated throughout the western and Midwestern U.S" our approach to this project at this point in time is to proceed cautiously, carefully consider, protect, and conserve the natural resources of the site and adjacent lands, and slow down the incentivized green energy freight train that is barreling through the State of Washington.

Specific Comments

We recommend that the information presented on the Northern Goshawk, a State Candidate Species for listing and a Federal Species of Concern, be consistent throughout the application. For example, on Page 1-8 it states that "although no goshawks were detected during protocol surveys, individuals were spotted during general avian migration and breeding surveys." This is in contrast to the information in Section 2.17.2 that states "no goshawks were found on the project site, nor were any observed on any surrounding properties. It is highly unlikely that goshawks will be found on the project site..." However, the data in Appendices B-5 and B-6 indicate that northern goshawks were recorded during both the Fall 2004 and Summer 2006 surveys. Additionally, Section 2.17.2 states that goshawk, and other avian species surveys were conducted ion 2004, 2005, and 2008. The appendices indicate that these surveys were also conducted in 2006.

We recommend that any statements addressing raptor mortality of operational wind power projects in shrub-steppe and agricultural habitats with the anticipated raptor mortality of this site be removed from any future reports as they are misleading. They are misleading because "other new wind plants in the Pacific Northwest" are in shrub-steppe and agricultural habitats; not coniferous forest..." We appreciate that an attempt was made to suggest that raptor mortality "is expected to be low." However, based on information in the application, raptor use of the site is high. In fact, ..."raptor use of the Saddleback area in Fall is approximately 1.5 times higher than mean fall use at the other WRAs." (in east Oregon and Washington) and that..."raptor use of the Saddleback project area...is moderate to moderately high compared to most other WRAs evaluated throughout the western and Midwestern U.S."

Comprehensive auditory surveys were conducted for northern spotted owls and goshawks in 2004 and 2008. While the 2004 goshawk surveys appears to include the proposed turbine string to the east of the "Cedar Swamp" the 2008 survey does not. Interestingly, one bird species, the Barred Owl, was recorded frequently during the northern spotted owl surveys, but was not included in any of the avian reports. Additionally, while no spotted owls were recorded, we question the suitability of a wind farm within one of the few spotted owl special management areas in the State of Washington.

The bat data is extremely interesting and alarming in that "no data on bat mortality levels associated with wind energy developments in western coniferous forests are available to help predict risk to bats at the Saddleback Wind Resource Area." The data in Table 4 in Appendix B-8 should serve as warning that the Whistling Ridge Project could result in bat mortality 3-4 times higher than any other wind power project in the U.S. From Table 4, bat activity is a fairly good predictor of bat fatality. Fatality is presented in the number of bats/turbine. Using the Saddleback bat activity data from the table (138.4 bats) with the proposed 50 turbines, almost 7,000 bats could potentially be killed on an annual basis. However, "bat fatality patterns may differ from those in open habitats as well as in eastern deciduous forests."

The Turbine Timber Buffer (Figure 2.3-4), may reduce the typical open turbine string corridor, thereby reducing its appearance as an avenue for bird and bat travel, but may also attract birds and bats as a roosting, foraging, and nesting habitat. At this point, we recommend that additional discussions occur to develop the most suitable management actions along the turbine strings.

We also recommend that sensitive features such as such as snags, water, Oregon white oak, and talus be identified as an aid to impact assessment.

We look forward to working with all interested parties through the development of this project.

Sincerely,

Michael Ritter

Michael Ritter
Wind Mitigation Biologist

Scoping Comment
#342

Bhavnani, Monica (CTED)

From: mary wiley [redacted]@gmail.com]
Sent: Monday, May 18, 2009 12:14 PM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. The potentially affected species include northern spotted owl, western gray squirrel, northern goshawk and other raptors, several species of bats, multiple migratory bird species, mule deer, black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

Locating 426-foot-tall turbines on the ridgeline of the Columbia River Gorge would also degrade the scenic values of the Gorge. The turbines would be highly visible from several designated key viewing areas within the National Scenic Area, including Interstate 84, the Historic Columbia River Highway, Cook-Underwood Road, and Panorama Point. The project would introduce highly visible industrial facilities into the natural, forested landscape, protruding above ridgelines and detracting from the natural scenic beauty of the Gorge. The wind towers would have daytime and nighttime warning lights, which would worsen the aggravate scenic impacts.

Finally, the proposed project would be located partially within the Columbia River Gorge National Scenic Area. Specifically, the applicant proposes to construct, expand, and improve more than two miles of roads within the National Scenic Area in order to haul industrial materials with gross vehicle weights of up to 53 tons. This proposal to construct and use Scenic Area lands for industrial purposes is prohibited by the National Scenic Area Act and Management Plan, and must be denied.

I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

mary wiley
[redacted]
portland, OR 97214

503-231-[redacted]

Scoping Comment #343

Bhavnani, Monica (CTED)

From: Jill Cooper[redacted]@gmail.com]
Sent: Monday, May 18, 2009 12:14 PM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

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This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. The potentially affected species include northern spotted owl, western gray squirrel, northern goshawk and other raptors, several species of bats, multiple migratory bird species, mule deer, black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

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I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Jill Cooper
Skamania, WA

Jill Cooper
[redacted]
Seattke, WA 98118

Scoping Comment #344

Bhavnani, Monica (CTED)

From: Velma [redacted]@gorge.net]
Sent: Monday, May 18, 2009 12:17 PM
To: CTED EFSEC
Subject: Wind Turbines

Re: SDS proposal of Wind Turbines

Please no Wind Turbines on Underwood Mountain!

Sincerely, V.R. Budworth

Scoping Comment #345

Bhavnani, Monica (CTED)

From: [redacted]@aol.com
Sent: Monday, May 18, 2009 12:37 PM
To: CTED EFSEC
Subject: Comments to EFSEC on the Whistling Ridge Energy Project

To the WA State Energy Facility Site Evaluation Council:

I am sending a copy of an email concerning industrial wind turbine noise sent from Rick James, a Sound Engineer from Michigan, to Wendy Todd, a resident of Mars Hill, Maine who is living with the tremendous negative effects of an industrial wind power project with turbines about 1/4 of a mile from her house. I personally have visited Ms.Todd and her family in Mars Hill and actually stayed in their house for several days, so I fully understand their situation and concerns. This is critical information which I believe should be part of the record for the Scoping Meetings sponsored by the WA EFSEC and the Bonneville Power Administration (BPA) that were held in Stevenson, WA and Underwood, WA on May 6th and 7th, 2009 respectively.

There is much new science emerging regarding industrial wind turbine noise, both at the audible and the low-frequency levels, and its role in affecting the health of residents (and even domestic and wild animals) who live near these turbines. Since this impact can be so devastating and severe on humans and other species, this issue must be carefully studied BEFORE local, state or federal governments make irreparable decisions on the siting of industrial wind power projects that will negatively affect more populations.

I have already sent the Council additional important informational articles by mail concerning industrial wind power. I hope that the Council does find the time to review this information carefully in order to make a more informed decision on the Whistling Ridge Project. Thank you again for this opportunity for me to voice these concerns that are so crucial in regulating the planning, siting, construction and operation of these huge industrial power plants.

Sincerely,

Jill Barker
[redacted]
Mosier, OR 97040
(541) 478-[redacted]

****

Hello everyone,

I am forwarding the following correspondence because many have found it profoundly interesting.

Rick James is a sound expert from Michigan and was kind enough to elaborate on an e-mail that I sent to someone in Dixmont, Maine. His words are comforting to those of us who have been trying to explain what we are dealing with in regards to turbine noise. It is amazing to have someone explain it that is actually an expert in the field of community noise and who understands what we are talking about. We hope it is helpful to others. Pass it on if you find it helpful.

Wendy Todd - Mars Hill Mountain Landowners Association, Maine

---

Hello everyone,

Thought I would forward this correspondence with Elizabeth Davis. She is from Dixmont, Maine. She is looking for any help in the battle against two developers wanting to site turbines on the local ridges(Dixmont, Jackson, Thorndike). One developer is UPC/First Wind.

If anything I said below sounds incorrect please let me know. I want to keep it real but sometimes I get so angry.

Wendy

----- Original Message -----

From: Perrin

To: Elizabeth Davis

Sent: Monday, January 05, 2009 11:59 AM

Subject: MARS HILL

Elizabeth,

One point that you may need to be up on. On December 18th, the Maine DEP met with Mars Hill residents to go over the findings of the noise studies that were conducted by UPC/First Wind. They have decided to grant them compliance even though the studies show that, each of the 4 quarters of testing, noise levels exceeded the permit requirements. Their stance is that they are not so "wildly" out of compliance that they deem the project should be shut down or even regulated.

People need to understand that the Maine DEP will not protect them from these developers. The Governor wants wind to be expedited in the State at whatever cost. If individual towns do not educate themselves and put restrictions in place to protect their people there will be **no** protection for their people.

Our ambient lows reach 25 dba sometimes even lower, with the turbines putting out anywhere from 35 to 58 dba there is a possible 30+ dba difference to our landscape. If this was to happen anywhere else there would be a public outcry so loud the world would hear. If the noise on Main Street was allowed to increase by 30 dba it would cause hearing loss. Trucks on Main Street put out anywhere from 60 to 90 dba depending on their size and load. Hearing loss starts at around 90 dba depending on length of exposure. If people in the town of Mars Hill had the 50+ dba of repetitive turbine noise they too would have their sleep affected and would be irate. Because we are so few we are expendable.

Someone within the Maine DEP, who I will leave unnamed for now, stated that we have a **duty** to tell the public what happened in Mars Hill. I know that there are people in the department who know it is wrong but their hands are tied. I fear that before there is any new policy to protect people and their property it will be too late for many residents of Maine.

Warn your people of these things because they will not understand it until they are living it and then it will be too late.

Wendy

----- Original Message -----

From: Rick James
Sent: Monday, January 05, 2009 2:56 PM
Subject: RE: MARS HILL

Wendy,

You are correct on your technical points. I will add that your pre-turbine background sound levels (LA90) were probably even lower than 25 dB if measured carefully. I routinely find background sound levels in the range of 18-25 dBA in rural settings not located near highways that are busy at night.

On the topic of Hearing loss, the most sensitive people start to show hearing loss when the average sound level over a typical day is consistently over 70 dBA for years at a time. The 90 dBA limit for an eight (8) hour work-shift was set back in the 1960's under the assumption that the work hours would have 16 hours of "quiet-time" between each work day for the ears to recover before being assaulted by noise again. If they were to be revised today they would be considerable lower than 90 dBA. Probably 80-85 dBA. Further, the mechanism of harm from wind turbine sounds (see Pierpont for details www.windturbinesyndrome.com) is different than the mechanism that causes normal noise-induced hearing loss.

1) The first form of harm from wind turbine noise is economic and asthetic. The outdoors near homes within about a mile of a wind turbine has sound levels of 45-55 dBA. This is no longer the natural sound of the outdoors in a rural setting. That is, the wind turbine noise masks the normal soundscape and so the sounds of nature which were present 24/7/365 are now covered by the noise of the whooshing wind turbine blades. This has an annoyance effect and thus limits the use of outdoor properties since the soundscape that made the rural home's outdoors "special" has been destroyed. With wind turbines in place an outdoor walk or party is not much different than if one lived near a busy highway in an urban area. It is not a stroll through nature anymore. Sitting around at an outdoor party is not the same either. Instead of listening to the sounds of nature that make the outdoors so refreshing and enjoyable like the birds, tree frogs and other sources of natural ambient sound; one hears wind turbines. Thus, whatever economic and psychological assets one has in a 'country home' are lost. This is reflected in lower property values and loss of use of one's property for the purposes it was originally purchased. Thus, the outdoor noise from wind turbines does harm a local property owner both economically and psychologically primarily due to annoyance at the loss of the pre-turbine conditions and being forced to 'live' with the same negatives as suburbanites without any of the benefits of suburban living (if there are any).

2) The second form of harm is that the sound of the wind turbines can easily penetrate modern wood frame homes with little or no loss in intensity. Inside one's home, especially with windows closed, the wind turbine sounds are predominantly the lower frequency sounds. Most homes, especially at night when appliances and entertainment equipment are off, are much quieter than the outside. I have measured bedrooms in homes near highways where the nighttime sound levels are less than 20 dBA. I have measured sound levels of less than 30 dBA inside bedrooms during the daytime, with windows open, a TV on in a room down the hall, and with the refrigerator running in the kitchen. This quiet interior condition can lead to the wind turbines seeming to be as noisy or even noisier inside a home than outside. The wind industry likes to say that a turbine is no louder than a conversation or a refrigerator. While they may be able to point to data to support that statement (carefully cherry-picked data) they do not continue their 'example' by asking how many people would like to have a refrigerator in their bedroom or a conversation being held right outside their bedroom window every night. This is explained in more detail in the "The 'How to'... Guide" by Mr. Kamperman and James available on Dr. Pierpont's web site, but to sum it up, the wind turbine sound inside a home leads to sleep disturbance. People who are subjected to repeated sleep disturbance find that it leads to physical and mental health risks that are not trivial and if not address can lead to permanent pathologies that affect one's quality of life and other aspects of overall health. The group most at risk includes children, especially those six and under; people with pre-existing health issues, especially if that includes sleep disorders; and seniors who are healthy but susceptible to sleep disturbance. One only needs to look at how many commercials are for products to help get a good night's sleep to understand that this 'sensitive' group is not small, it may even be a majority of those who are young or old.

3) The third form of harm is from the very low frequency sounds that are generally in-audible, even inside a home, but may be perceived as a vibration or physical movement of a body organ, like the chest cavity, heart or

eyes. The very lowest frequency sound emissions from wind turbines (0 Hz to about 50 Hz) penetrate all home walls and roofs without any attenuation. This frequency range is also where the majority of the acoustic energy is located in the wind turbine sound. Compared to other health issues, very little research has been done on how low frequency sound, at the levels found in homes near wind projects, affects health over long periods of time. Most other sources of similar low frequency sound are not part of the normal soundscape in residential areas on a 24/7/365 basis. Further, these low frequency sounds can interact with the shape and size of interior rooms resulting in a resonant condition where the sound energy from the wind turbines builds up to levels that can be significantly higher that what would be measured if the room did not resonate. Thus, each home has its own impact on how intense the low frequency energy may be inside and it can vary from room to room in the same home.

What research has been done has been primarily for the military such as the Air Force and Navy where the large airplanes and ships may subject some or all of the occupants to sustained exposure to very low frequency sound. The research that has been done on homes affected by wind turbine's has been primarily by Mariana Alves-Pereira and the VAD Team (Portugal, see attached document for current status of studies) and Dr. Nina Pierpont (web version of study available at www.windturbinesyndrome.com). There are several other studies that are less rigorous, but all of them are indicating that there is a relationship between long term exposure to wind turbine sounds and the health of the people who are living closer than 1 mile from the wind projects. At this time, the suspected cause is the low frequency energy (0-50 Hz, maybe up to 100 Hz) which carries both the bulk of the acoustic energy from wind turbines and also is not reduced, and may be amplified, by modern home construction.

Please read the web version of Dr. Pierpont's work for the details. It should be noted that Dr. Pierpont's prior work was discounted by the wind industry (not the medical community, just the pro-wind non-medical promoters) on the basis that it was not 'peer' reviewed. This new study has been thoroughly peer reviewed and the comments of the peer reviewers are both favorable and available as part of the published study. At this time, it is no longer true to say there is no evidence that wind turbines cause health risks. That position, often stated by the wind industry, is not longer supportable given the work of Dr. Pierpont, the VAD team, and others. This means that wind turbine siting should include oversight from the State's Public Health agency. The risks to public health from wind turbines are well enough established that your local public health agency and your local doctors should be involved in developing any siting standards. It also means that attempts by the wind industry to get setbacks of anything less than one mile are ignoring current medical research.

Rick (James)

E-Coustic Solutions

Okemos, MI 48805

Tel: (517) 507-[redacted]

Fax: (866) 461-[redacted]

Email: [redacted]@e-coustic.com

Scoping Comment #347

Bhavnani, Monica (CTED)

From: Chris Lloyd [redacted]@gorge.net]
Sent: Monday, May 18, 2009 12:43 PM
To: CTED EFSEC
Subject: Comments for the record on Whistling Ridge Energy Project in Skamania County, Washington

Dear Mr. Fiksdal,

I believe that this wind energy project will be the poster child for future wind energy projects in WA. As the first such project proposed on forested lands and the first project to be placed directly in one of the most scenic of the gorge view corridors directly opposite and closely viewable daytime and especially at night from Hood River and White Salmon. This project will generate the kind of local, statewide and national (and international) publicity that will reflect on the future of wind energy in WA. As the first of its kind, decisions made on this project and the people that make these decisions will likely face close scrutiny on the reasons for them in the future.

The economies of the surrounding communities in WA are more closely tied to the booming tourism and recreation economy developing around the nationally and internationally renowned Hood River, OR area than the center of Skamania county government which is in Stevensen, 40 minutes drive away.

Hood River National Press Exposure

Two Major Articles in the Travel section of the New York Times

http://travel.nytimes.com/2009/04/10/greathomesanddestinations/10Havens.html?scp=1&sq=Hood+River&st=nyt
http://travel.nytimes.com/2009/04/10/greathomesanddestinations/10Havens.html?scp=1&sq=Hood+River&st=nyt

Men's Journal -

"Best Places to Live: The 50 Healthiest, Sexiest, Most Adventurous Towns." Hood River is named at the top of their list for the "Most Active Towns - Multisport hubs with something for everyone."

Outside Magazine - Top 20 Dream Towns" at #11 last year.

Outside Magazine - "100 Adrenaline Hot Spots" in their April 2006 issue.

Hood River is listed as an "Adventure Mecca - Ultimate Cascades" in the listing, citing the easy access to whitewater, windsurfing and kiteboarding, summer skiing, and mountain and road cycling.

http://www.hoodriver.org/HRCCC_ArticleTemplate.asp?ArticleINDX=294&CategoryINDX=24

Photos of Hood River appear weekly in national and international magazines. At night, the ridge tops on the WA side where the turbines will be viewable are now free of interruption and night light pollution. You may have noticed the full moon rising the day EFSEC took comments from the Underwood community and their community center.

Now imagine all the people in their hotel rooms and vacation rentals viewing these turbine right at the end of the National Scenic Area.

The communities of Underwood, White Salmon and Bingen are much more closely tied to the success of Hood River than that of Skamania County as a whole. This area is a shiny jewel that should not be tarnished with such carelessness. It is both a state and national treasure.
SDS's direction represents the exact opposite direction the state should be headed in for development in these communities. Would you support the communities or a single corporation in defiance of the community. If the latter than we can imagine what the many tourists visiting from Seattle, the power base of WA politics will think when they see this treasure defiled in such a manner.

I promise this will be the poster child for wind energy that shows people where to draw the line on siting for turbines.

Sincerely,
Chris Lloyd

[redacted]
Underwood, WA 98651
509-493[redacted]

Scoping Comment
#348

Bhavnani, Monica (CTED)

From: Susan Dornfeld [redacted]@hotmail.com]
Sent: Monday, May 18, 2009 12:52 PM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. The potentially affected species include northern spotted owl, western gray squirrel, northern goshawk and other raptors, several species of bats, multiple migratory bird species, mule deer, black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

Locating 426-foot-tall turbines on the ridgeline of the Columbia River Gorge would also degrade the scenic values of the Gorge. The turbines would be highly visible from several designated key viewing areas within the National Scenic Area, including Interstate 84, the Historic Columbia River Highway, Cook-Underwood Road, and Panorama Point. The project would introduce highly visible industrial facilities into the natural, forested landscape, protruding above ridgelines and detracting from the natural scenic beauty of the Gorge. The wind towers would have daytime and nighttime warning lights, which would worsen the aggravate scenic impacts.

Finally, the proposed project would be located partially within the Columbia River Gorge National Scenic Area. Specifically, the applicant proposes to construct, expand, and improve more than two miles of roads within the National Scenic Area in order to haul industrial materials with gross vehicle weights of up to 53 tons. This proposal to construct and use Scenic Area lands for industrial purposes is prohibited by the National Scenic Area Act and Management Plan, and must be denied.

I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Susan Dornfeld
[redacted]
Portland, OR 97207

503-888-[redacted]

Scoping Comment #349

Bhavnani, Monica (CTED)

From: [redacted]@aol.com
Sent: Monday, May 18, 2009 1:03 PM
To: CTED EFSEC; CTED EFSEC
Subject: Whistling Ridge Opposition

Dear Mr. Fiksdal,

I would like to share two relevant quotaions with the EFSEC members.

"The nation behaves well if it treats the natural resources as assets which it must turn over to the next generation increased, and not impaired, in value." Theodore Roosevelt

"A politician thinks of the next election. A stateman, of the next generation" James Freeman Clarke

We have too many politicians in Skamania County who want to impair the value of the Columbia Gorge National Scenic Area for the next generation.

Industrial energy facilities do not belong in this, or any other national scenic area.

Thank you.

Rebecca Maxey
[redacted]
Underwood, WA 98651

Scoping Comment #350

Bhavnani, Monica (CTED)

From: [redacted]@aol.com
Sent: Monday, May 18, 2009 1:47 PM
To: CTED EFSEC
Subject: Windmills near White Salmon, WA

To Whom it May Concern,
The windmills are not a match for the Gorge Scenic Area.
with blinking lights, extra noise and the possibility of killing our beautiful birds of prey.
I'm a proponent of wind generated energy. ..and it's not that I just don't want it in my beautiful backyard ...there are Plenty of other more sensible areas East of Hood River,White Salmon (Gorge) area that would be a much better match
...places that are more barren, more wind driven and probably need the revenue...
Tourists come here to the Gorge to see some last remaining wild beauty. Please block this proposal.
Sincerely,
Blue Ackerman
Hood River,OR

Scoping Comment
#351

Bhavnani, Monica (CTED)

From: Maryanne Csizmazia [[redacted]@gmail.com]
Sent: Monday, May 18, 2009 1:51 PM
To: CTED EFSEC
Subject: Wind Turbines

I am totally opposed to the Whistling Ridge wind turbine project-this is on inappropriate location for a wind project. A much more appropriate location is East of the Gorge past Maryhill. Maryanne Csizmazia, underwood, WA

Sent from my iPhone

Scoping Comment #352

Bhavnani, Monica (CTED)

From: Jeremiah Leipold [redacted]@hotmail.com]
Sent: Monday, May 18, 2009 2:02 PM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. The potentially affected species include northern spotted owl, western gray squirrel, northern goshawk and other raptors, several species of bats, multiple migratory bird species, mule deer, black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

Locating 426-foot-tall turbines on the ridgeline of the Columbia River Gorge would also degrade the scenic values of the Gorge. The turbines would be highly visible from several designated key viewing areas within the National Scenic Area, including Interstate 84, the Historic Columbia River Highway, Cook-Underwood Road, and Panorama Point. The project would introduce highly visible industrial facilities into the natural, forested landscape, protruding above ridgelines and detracting from the natural scenic beauty of the Gorge. The wind towers would have daytime and nighttime warning lights, which would worsen the aggravate scenic impacts.

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I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Jeremiah Leipold

[redacted]

Troutdale, OR 97060

Scoping Comment #353

Bhavnani, Monica (CTED)

From: Eileen Garvin [redacted]@gmail.com]
Sent: Monday, May 18, 2009 2:19 PM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. The potentially affected species include northern spotted owl, western gray squirrel, northern goshawk and other raptors, several species of bats, multiple migratory bird species, mule deer, black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

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I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Eileen Garvin
[redacted]
Hood River, OR 97031

Scoping Comment
#354

Bhavnani, Monica (CTED)

From: Lisa Hauge [redacted]@gorge.net]
Sent: Monday, May 18, 2009 2:22 PM
To: CTED EFSEC
Subject: Opposition to Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

All of my thoughts of the last six months since becoming aware of the SDS Whistling Ridge project are summed up well below. I have VERY STRONG OPPOSITION to this project for all the reasons listed.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

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I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Lisa Hauge
[redacted]
Underwood, WA 98651

Scoping Comment
#355

Bhavnani, Monica (CTED)

From: [redacted]@gorge.net
Sent: Monday, May 18, 2009 2:27 PM
To: CTED EFSEC
Subject: Saddleback Wind Turbine Project

To whom it may concern,

As a resident of Underwood since 1985, I have formed an educated opinion of the Saddleback Wind turbine project. Living in a National Scenic Area has been a priviledge. With that has come MANY restrictions.

Upon building our home in Underwood, we were subject to MANY compromises to protect the scenic, natural and cultural areas of the Gorge.

We painted our home a blend in brown. We planted trees and were restricted in cutting or pruning trees. We adapted to lighting restrictions. We limited our window selection as to not reflect light.
We compromised.

I have witnessed my neighbors being denied the opportunity to divide their land for their families.

I believe this project, only thirty feet outside the Scenic Area boundary and over 400 feet high with red lights atop each structure does not meet, in ANY WAY, the same restictions.

Please help us continue the compromise that living in a NSA demands. I applaud the Gorge Commission for all they have accomplished in protecting The Gorge for generations to come.

I believe the Saddlback Wind Turbine project is the right project at the right time but IN THE WRONG LOCATION.

Thank you,
Patricia C Dixon
Underwood, WA

Scoping Comment
#356

Bhavnani, Monica (CTED)

From: Saylor Hauge[redacted]@gorge.net]
Sent: Monday, May 18, 2009 2:30 PM
To: CTED EFSEC
Subject: Opposition to Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of all portions of the project, including both the Skamania Co. and Klickitat Co. portions.

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I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Saylor Hauge
[redacted]
Underwood, WA 98651

Scoping Comment #357

Bhavnani, Monica (CTED)

From: Leif Hauge [redacted]@gorge.net]
Sent: Monday, May 18, 2009 2:30 PM
To: CTED EFSEC
Subject: Opposition to Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

I am writing to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

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I support renewable energy, but I am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area, a designated national scenic treasure.

Leif Hauge
[redacted]
Underwood, WA 98651

Scoping Comment #358

Bhavnani, Monica (CTED)

From: Loreley Drach [redacted]@gorge.net]
Sent: Monday, May 18, 2009 2:36 PM
To: Fiksdal, Allen (CTED); CTED EFSEC
Subject: Comments on Whistling Ridge Energy EIS Scoping and Land Use Consistency

Comments submitted to Washington State EFSEC concerning the Whistling Ridge Energy Project EIS Scoping and Land Use Consistency.

May 18, 2009

Loreley Drach
P.O. Box 31
Underwood, WA 98651

Dear EFSEC,

I am very concerned about potential conclusions from an EIS where the fundamental data derived for analysis is prepared by the applicant. I have concerns that too much temptation exists to create data which favors a specific outcome.

I would also like to address the following topics:

EIS Scoping Comments:

Bald Eagle: This information needs to be included in great detail. Area has over wintering and year round population of Bald Eagles. Nesting sites, roosting sites, feeding sites and movement between the three sites need to be thoroughly addressed in relation to the proposed project. Migratory routes need to be addressed. Assessment should include the potential future lost recruitment from the loss of each adult.

Bat Survey: Bats are present in the area as early as March. We see bats frequently between the months of March and late September feeding in the perennial creek and around the forest fringes of our property. (Our property sits 2500 feet from the proposed project's southern area border.) The bat surveys should include the entire season for bat activity in the area (not just July-Sept). Also, particular emphasis should be placed on using methods that can positively identify the Townsends Big Eared Bat, a sensitive species residing in the nearby Lava Beds and reported to inhabit the White Salmon and Little White Salmon River valleys. More information needs to be known on the numbers, distribution, movement and status of this species prior to introducing a potentially significant cause of mortality into an important breeding area.

Other Birds: All other birds of prey, migrating songbirds, and important candidate and sensitive species such as the Pileated Woodpecker need to be identified and the immediate and long term impacts on each species addressed.

Deer and Elk Over Wintering Range: Impacts on the migratory routes and over wintering range of wildlife needs to be addressed. The 1977 Skamania County Comprehensive Plan, page 75, graphically identifies heavy winter concentrations of wildlife to either side of the proposed project area.

Water Resources: The applicant omits the existence of a Perennial Stream in the immediate proximity to the A-Array in their maps. A DNR Forest Practices Application (FPA #2704293), submitted by SDS Lumber, the project applicant, clearly identifies this stream as adjacent to the project. (NP stands for Non-fish, Perennial) All streams in the proximity to the project need to be clearly identified and related impacts included in the EIS assesment.

Owl Survey: I have reviewed the preliminary application and find it very concerning the absence of owl responses. The area of the perennial stream mentioned above and not identified in the application contains significant owl habitat and needs to be included in the survey. Our suggestion is that all further EIS work needs to include extensive independently conducted owl surveys in this area beginning immediately.

Geologically Unstable areas: The proposed project site contains unstable slopes. These need to be addressed in greater detail than identified in the application.

Scenic Impacts Visuals: Need to be performed to the USFS recommendations for assessment of NSA scenic impacts by qualified landscape architect. The application photo simulations were completely inadequate as were the assessment stated in the text.
Furthermore, even the best still images can not communicate the visual dominance that rotating Turbine blades have on the scenic viewsheds, regardless of their proximity to the National Scenic Area.

Economic Impacts: Needs to address the long term economic impacts of degrading the outstanding scenic views. Comparable information from other sites such as World Heritage and National Parks of outstanding geology and low development indexes need to be included with National Scenic Area analysis. Economic Impact needs to address the long term implications, for example, when the novelty of wind turbines has dissipated and they are viewed as massive industrial energy complexes.

Maps: General area maps are not placed or scaled properly. Maps on land use are in many cases absolutely incorrect. These need to be corrected.

Impacts on Human Health and Well Being: The project is proposed in complex topography and this factor needs to be included in any sound propagation modeling. Maximum sound levels (ie worst case scenarios) need to be modeled and reported honestly. The dBC range should be included. The latest information from qualified independent Medical Doctors and Researchers and Acoustical Engineers should be incorporated into study design and analysis. The applicant's preliminary report on Sound appears to use a rudimentary logarithmic decay model for sound attenuation based on standardized or idealized assumptions. Due to the complex topography and the proximity of non-participating landowners living in low-pressure zones below the proposed Turbines, a 3-dimensional sound propogation analysis is justified. Many engineering universities would have the infrastructure and capacity to undertake the analysis.

Forestry: The information as presented by the applicant attempts to show minimal impacts to forest operations. A perfect curved hillside is depicted as an example. This scenario would result in the smallest loss of trees for future forestry operations. Unfortunately, the presented scenario is not reality on the ground. The forestry operations are on the leading edges of ridges and on more gradually sloping ground where much more significant deforestation will need to be maintained. The EIS needs to map airflow and vegetation height for each string of turbines as it relates to topography and the actual acres that will be lost from forestry.

Land Use Consistency Comments:

Land use: The Applicant makes erroneous and contradictory assertions about the current and "proposed" land use. The Applicant should be required to completely redo the land use portion and depict it in a consistent and correct manner. As the application stands, the land use portion is filled with inaccuracies and misrepresentations. The impacts of this project as it relates to land use cannot be adequately assessed by anyone if only based on the information contained within the proponent's application material. Just a few examples:

Asserts: *2.1.4. Pursuant to the locally adopted land use plans and ordinances in effect at the time of this application.... three to four turbines would be located on property zoned Residential 10...*
Actual: Turbines A1-A7 are all located in For/Ag20 zone in the current zoning. This language may have been included when the applicant was writing and assuming the proposed zoning language would be passed.

Asserts: *2.1.4. In the current draft ordinance, the entire project area is proposed for Forest Land 20 (FL-20) zoning.*
Actual: In the current draft ordinance, nearly the entire project is in lands zoned Commercial Resource Lands (CRL-40) and the first four turbines of the A-Array, sited in the adjacent section, are zoned Residential 10 (R-10) and *"Large-Scale Wind Energy Facilities"* are not allowed in residential zones, period. This assertion also contradicts the assertion below.

Asserts: Appendix E. *In the proposed Title 21 zoning the Project would be entirely on lands proposed for inclusion in a new Commercial Resource Lands (CRL 40) zone.*
Actual: In the proposed zoning, the Project would NOT be *entirely* on lands proposed for inclusion in Commercial Resource Lands (CRL-40). A portion of the project is also proposed in a Residential zone where such a facility (or portion thereof) cannot, by any stretch of the imagination, be sited! The proposed zoning states a half mile setback to residentially zoned lands. If a closer setback were allowed, turbines could NOT be any nearer than the height of the turbine plus 50 ft to a residential zone. This requirement removes the A-Array completely. The maps do not display this requirement of the proposed zoning.

Thank you for the consideration of my comments.

Loreley Drach

Scoping Comment #359

Bhavnani, Monica (CTED)

From: Loreley Drach [redacted]@gorge.net]
Sent: Monday, May 18, 2009 2:40 PM
To: CTED EFSEC; Fiksdal, Allen (CTED)
Subject: Supplimental to Loreley Drach comments
Attachments: fp2704293.pdf

Dear EFSEC,

Please include the attachment with my previous comments. I forgot to attach before hitting the send button.

Thank you,

Loreley Drach

2704293

WASHINGTON STATE DEPARTMENT OF
Natural Resources

Forest Practices Application/Notification
Office Checklist Page 1

SE Region

FPA/N #: 2704293
Received Date: 9/05/08
Comments Due Date: 9/18/08
Decision Due Date: 10/4/08
FP Forester: Jon Paul
Shutdown Zone: 660
RMAP #: R27000992

FPA/N CLASSIFICATION: [ ] II [X] III [ ] IVG [ ] IVS RMAP Exempt: [ ] 80/20 [ ] No Forest Rds [ ] Ag [ ] LLO

Landowner Name: SDS Company LLC Project Name: Fern

WRIA: Wind-White Salmon WAU: Little White Salmon River

Legal Description: S 18 T3 R10E

Activity Type: Harvest 80 ac Spray — ac Stream Crossing(s) NP, NS

Rd Constr 5,000 ft Rd Abandonment — ft

ALTERNATIVE PRESCRIPTIONS

[ ] Alternate Plan
[ ] Ten-Year Forest Plan
[ ] Columbia River Gorge National Scenic Area
[ ] Watershed Analysis:_____
[ ] Habitat Conservation Plan
[ ] Bald Eagle Management Plan
[ ] Landowner Option Plan for Northern Spotted Owl
[ ] Cooperative Habitat Enhancement Agreement

RESOURCE REVIEW

[ ] Saltwater Islands (Name:_____)
[ ] Rain-on-Snow and Outside Approved WA
[ ] Unstable Slopes (Risk Home,Highway,Water:_____)
  [ ] Soils Map (Highly Erodible & Very Unstable)
  [X] SLPSTAB moderate/high
  [ ] Landslide Hazard Zonation
[ ] Hydric Soils [ ] In Wetland [ ] Forested, [ ] A, [ ] B
[ ] In WMZ of [ ] Forested Wetland, [ ] A, or [ ] B
[X] In RMZ/ELZ of Type [ ] S, [ ] F, [X] N water
[ ] Water Verification
[X] Bull Trout Overlay
[ ] HCP Bull Trout Population
[ ] Group A or B Water Supply (TRAX code DM or MU)
[ ] Hatchery (TRAX code S)(Name:_____)
[ ] Even-Aged Harvest greater than 120 Acres
[X] Volume greater than 5 MBF per acre
[X] Ground-based Equipment on Slopes greater than 40%
[ ] Road Construction on Slopes greater than 65%

ASSOCIATED DOCUMENTS – On file with the FPA/N at the region office.

[ ] Conversion Option Harvest Plan
[X] Road Maintenance and Abandonment Plan
[ ] SEPA Checklist/Documents
[ ] Wetland Mitigation Plan
[ ] Water Protocol Surveys [ ] Modification Form
[ ] Qualified Expert Report
[ ] HPA Plans & Specifications
[ ] Marbled Murrelet Form
[ ] Hardwood Conversion Form
[ ] Natural Regeneration Plan
[ ] DFC Software Printout
[ ] FPBM Appendix(s) _____
[ ] HPA Plans & Specifications
[ ] Shoreline Permit

ADDITIONAL COMMENTS

NP partial harvest

2704293

WASHINGTON STATE DEPARTMENT OF
Natural Resources

For DNR Region Office Use Only	
FPA/N #:	2704293
Region:	Southeast
Received Date:	9/5/08

Forest Practices Application/Notification
Eastern Washington

PLEASE USE THE INSTRUCTIONS TO COMPLETE THIS APPLICATION.
TYPE OR PRINT IN INK.

1. **Landowner, Timber Owner, and Operator**

Legal Name of LANDOWNER	Legal Name of TIMBEROWNER	Legal Name of OPERATOR
SDS Company LLC	SDS Lumber Company	SDS Lumber Company
Mailing Address: POB 611	Mailing Address: Same	Mailing Address: Same
City, State, Zip Bingen, WA 98605	City, State, Zip Same	City, State, Zip Same
Phone (509) 493-2155 Email: samg@sdslumber.com	Phone ( ) Email:	Phone ( ) Email:

2. **Contact person**

Contact Person:	Phone (509) 493-2155
Sam Grimm	Email: samg@sdslumber.com

NOTE: You are required to verify water types, except type S waters, within 130 feet of your proposed forest practices activities prior to submitting a Forest Practices Application / Notification. Use the Additional Information section, additional pages, the Water Type Classification Worksheet and/or a Water Type Modification form to explain how you verified water types. See instructions.

Southeast Region

AUG 25 2008

Department of Natural Resources

3. **Are you a small forest landowner?**
   [X] No. [ ] Yes. *See instructions.*

4. **If you are harvesting timber, enter the Forest Tax Reporting Account Number of the Timber Owner: 800010412**
   For tax reporting information or to receive a tax number, call the Department of Revenue at 1-800-548-8829.

5. **Are you substituting prescriptions from an approved state or federal conservation agreement or watershed analysis?**
   [X] No. [ ] Yes. *Write "HCP" or "Using Prescriptions" in tables that apply. Attach or reference on file prescriptions and/or crosswalks.*

6. **What is the legal description of your forest practice?**

¼ ¼ (quarter quarter)	Section	Township	Range	E/W	Tax Parcel Number	County
W1/2, SW1/4	18	3N	10	E	03100000110000	Skamania
S1/2, NW1/4	18	3N	10	E	Same	same

7. **Have you reviewed this forest practices activity area to determine whether it may involve historic sites and/or Native American cultural resources?** *Read the instructions before answering this question.*

   [X] No. [ ] Yes.

8. **Do you have a DNR approved Road Maintenance and Abandonment Plan (RMAP)?**

   [ ] No. *If No, is a Checklist RMAP required? (see instructions)* [ ] No. [ ] Yes *Include a copy of the RMAP Checklist.*

   [X] Yes. *List the RMAP number: _2700099L_____.*

9. **Is this forest practice application/notification:** ***(Answer every question)***

   a. [X] No [ ] Yes Within city limits or inside an urban growth area? *IF YES SEE INSTRUCTIONS FOR ADDITIONAL REQUIRED DOCUMENTS.*

   b. [X] No [ ] Yes Within a public park? *If Yes, include SEPA Environmental Checklist or SEPA Determination - except for harvesting/salvaging less than 5,000 board feet within a developed public park.*

   c. [X] No [ ] Yes Within 500 feet of a public park? Park name: _____

   d. [X] No [ ] Yes On land that has been platted? *If it was short or long platted after January 1, 1960, include a SEPA Environmental Checklist or SEPA Determination.*

   e. [X] No [ ] Yes In an approved Conversion Option Harvest Plan (COHP) from the local government? *If yes, include a copy.*

   f. [X] No [ ] Yes Within 200' of the Ordinary High Water Mark (OHWM) or floodway of Type S water? If yes, does the activity require a Substantial Development Permit? [ ] Yes [ ] No *If yes include a copy of your Substantial Development Permit. See instructions for information.*

   g. [X] No [ ] Yes A request for a multi-year permit? If yes, length requested: [ ] 3 years [ ] 4 years or [ ] 5 years. *Not everyone qualifies for a multi-year permit. See instructions for details.*

   h. [X] No [ ] Yes An Alternate Plan? *If yes, include a copy.*

   i. [ ] No [X] Yes For road work that is included in an approved Road Maintenance and Abandonment Plan (RMAP)?

   j. [X] No [ ] Yes Within 50 miles of saltwater **and** do you own more than 500 acres of forest land in Washington State? *If Yes - include the "Marbled Murrelet Form" or attach/reference HCP prescriptions.*

10. **If constructing or abandoning forest roads and/or installing, removing, or replacing crossings in typed water, complete the table below. Show the road and crossing locations and identifiers on your Activity Map. Include abandonment plans for temporary roads and abandonment projects. Installation and removal of crossings in Type S or F Waters also require a Hydraulic Project Approval (HPA) permit from the Washington State Department of Fish and Wildlife (WDFW). This FPA serves as your request for an HPA (see instructions).**

Road Identifier *(Name, Number)*	Road Construction		Abandonment Plans	
	Length *(feet)*	Steepest Side-slope *(%)*	Length *(feet)*	Abandonment Date
1	600	30		
2	1400	30		
3	3000	30		

Crossing Identifier *(Letter, Number, or FFFPP)*	Installing, Removing or Replacing Structures in Typed Water			
	Water Type *(S, F, Np, Ns)*	Activity *(Install, Replace, Remove)*	Structure *(Culvert, Bridge, Ford)*	Proposed Size *(Dimensions of new structure)*
A	Np	Install	Ford	50 feet either side of stream
B	Np	None		See comments
C	Ns	Install	Culvert	48"

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11. If depositing spoils and/or expanding or developing a rock pit for forestry use, complete the table below. Show locations and identifiers on your Activity Map.

Spoil Area Identifier *(Number, Letter)*	Spoils Deposited *(Cubic Yards)*	Rock Pit Identifier *(Name, Number, Letter)*	Acres of New Rock Pit Developed	Acres of Existing Rock Pit Expanded

12. If operating in or within 200 feet of a wetland, complete the table below. Show the boundaries of each wetland, along with its identifier, and WMZ on your Activity Map.

Wetland Identifier *(Number, Letter)*	Wetland Type *(A, B or Forested)*	Planned Activities in Wetland	Planned Activities in WMZ	Total Wetland Area *(acres)*	How many acres are you draining?	How many acres are you filling?

If not harvesting or salvaging timber, skip to number 23.

13. If harvesting or salvaging timber, complete the table below. Show all harvest areas and unit numbers on your Activity Map. For even aged harvest units also show surrounding stand information on your Activity Map.

Unit Number	Harvest Type *(Even-aged, Uneven-aged, Salvage, Right-of-Way, Rock Pit, Spoils Area)*	Yarding Method *(Rubber Tired Skidder, Tracked Skidder, Dozer, Shovel, Full Suspension Cable, Leading End Suspension Cable, No Suspension Cable, Helicopter, Animal)*	Acres to be Harvested	Volume to be Harvested *(mbf)*	Volume to be Harvested *(Salvage only) (%)*	Estimated Number of Trees Per Acre Remaining After Harvest		Steepest Slope in Unit (%)
						Less than 10" dbh	Greater than or equal to 10" dbh	
1	Even	Ground	80	2000		0	4	50

14. Reforestation. Check the appropriate box(es).

[X] Planting. Tree Species: _Doug-fir_

[ ] Natural. *Include a Natural Regeneration Plan*

Not required because of one or more of the following:

- [ ] I am converting some or all of this land to non-forest land in the next 3 years or lands are exempted under WAC 222-34-050.
- [ ] Individual dead, dying, down, or windthrown trees will be salvaged.
- [ ] Trees are removed under a thinning program reasonably expected to maximize the long-term productivity of commercial timber.
- [ ] I am leaving at least 100 vigorous, undamaged, and well-distributed saplings or merchantable trees per acre.
- [ ] An average of 150 tree seedlings per acre are established on the harvest area and my harvest will not damage it.
- [ ] Road right-of-way or rock pit development harvest only.

15. Mark and describe the following harvest activities that will be done in or over typed water. Describe them in number 25, Additional Information.

Activity	Type S Water	Type F Water	Type Np Water	Type Ns Water
Equipment Crossing				
Ground Skidding				
Suspending Cables				
Cable Yarding				
Falling and Bucking			X	

16. Is the taxpayer eligible for the EARR Tax Credit? [X] Yes [ ] No

If you own MORE than 80 forested acres in Washington, skip to number 21.

17. Are you using the exempt 20-acre parcel riparian management zone (RMZ) rule on type S, F, or Np waters?

[ ] No *If no, skip to number 21.*

[ ] Yes *If yes, continue to number 18. See instructions for qualifications and information.*

18. Choose the answer below that best fits your situation. Show all RMZs on your Activity Map.

[ ] a. ALL of the following apply to me and my land:

- Between June 5, 2006 and today's date I have always owned less than 80 acres of forestland in Washington.
- Between June 5, 2006 and today's date this parcel has always been 20 acres or less of contiguous ownership.
- Between June 5, 2006 and today's date this parcel has always been owned by me or someone else that has owned less than 80 acres of forestland in Washington.

b. ONE OR MORE of the following apply to me and/or my land (check all that apply):

[ ] I currently own more than 80 acres of forestland in Washington.

[ ] Between June 5, 2006 and today's date I have owned more than 80 acres of forestland in Washington.

[ ] Between June 5, 2006 and today's date this parcel has been more than 20 acres of contiguous ownership.

[ ] Between June 5, 2006 and today's date this parcel has been owned by someone that has owned more than 80 forested acres in Washington.

19. If harvesting within 345 feet of a type S or F water on an exempt 20-acre parcel complete the table below. Show RMZs and stream segment identifiers on your Activity Map. Include stream shade analysis calculation if you are harvesting within 75 feet or the maximum RMZ, which ever is LESS.

Stream Segment Identifier *(letter)*	Segment Length *(feet)*	Adjacent Harvest Type *(partial cut or other)*	Maximum RMZ Width *(feet)*	Are you harvesting within the maximum RMZ? *(Y/N)*

20. Are you harvesting within 29 feet of a Type Np water on a 20 acre exempt parcel?

[ ] No *Skip to number 23.*

[ ] Yes *See instructions and describe leave tree strategy in number 25. Then skip to number 23.*

21. If harvesting within 130 feet of any of Type S or F waters, complete the table below. Include stand information for all inner zone harvests unless you have an HCP prescription. Show RMZs, CMZs, and stream segment identifiers on your Activity Map.

Stream Segment Identifier *(letter)*	Water Type *(S or F)*	Site Class *(I – V)*	Stream Width *(feet)*	Is there a CMZ? *(Y / N)*	RMZ Harvest Code(s) *(see instructions)*	Total width of RMZ *(feet)*

22. **If harvesting within 50 feet of any Type Np water, complete the table below. Include stand information. Show RMZs, along with their associated Stream Segment Identifiers, on your Activity Map:**

Stream Segment Identifier *(Letter)*	Selected Strategy *(Partial Cut or Clearcut)*	Stream Segment Identifier *(Letter)*	Selected Strategy *(Partial Cut or Clear Cut)*
Np	Partial		

23. **How are the following marked on the ground? *(Flagging, paint, road, fence, etc)***

Harvest Boundaries: Red ribbon (red and blue on property lines.

Clumped Wildlife Reserve Trees/Green Recruitment Trees: Clumped mostly in RMZ, a few scattered with red paint.

Right-of-way limits/road centerlines: Blue and white candy striped and pink ribbon.

Riparian Management Zone Boundaries and Leave/Take Trees: See below.

Channel Migration Zone: N/A.

Wetland Management Zone Boundaries and Leave/Take Trees: N/A.

24. **Are you converting the land to non-forestry use within 3 years of harvest?**

[X] No [ ] Yes *Include a SEPA checklist or SEPA Determination and copies of approved Clearing and Grading Permit*

25. **Additional information (attach additional pages if necessary):**

From 10 above: On crossing A, a rock ford will be used to cross the Np. There is an existing crossing at crossing B, disconnecting the Np and Ns. For this permit, the existing crossing will be used, and hydrologic connectivity restored/stream channel reconnected post harvest. Crossing will be rocked 50 feet either side of the stream. Crossing C will be a 48"x30' pipe. Roads A, B, and C are to be obliterated post harvest.

From 22 above: RMZ will be partial cut. The Np RMZ will be partially cut. There is approximately 4.6 Ac of RMZ. Total BA within the RMZ is approximately 2415, about 525 ft^2/Ac. The 10 largest trees/Ac have been left (46 trees—BA approx 377). An additional 189 trees have been left in the RMZ as per WAC 222-30-022; 2.b.i.C.II. BA of these additional trees is about 345. See attached spreadsheets for tree numbers. 50-foot zone is marked on the ground with orange "streamside management zone" ribbon. All leave trees described above are marked with red paint.

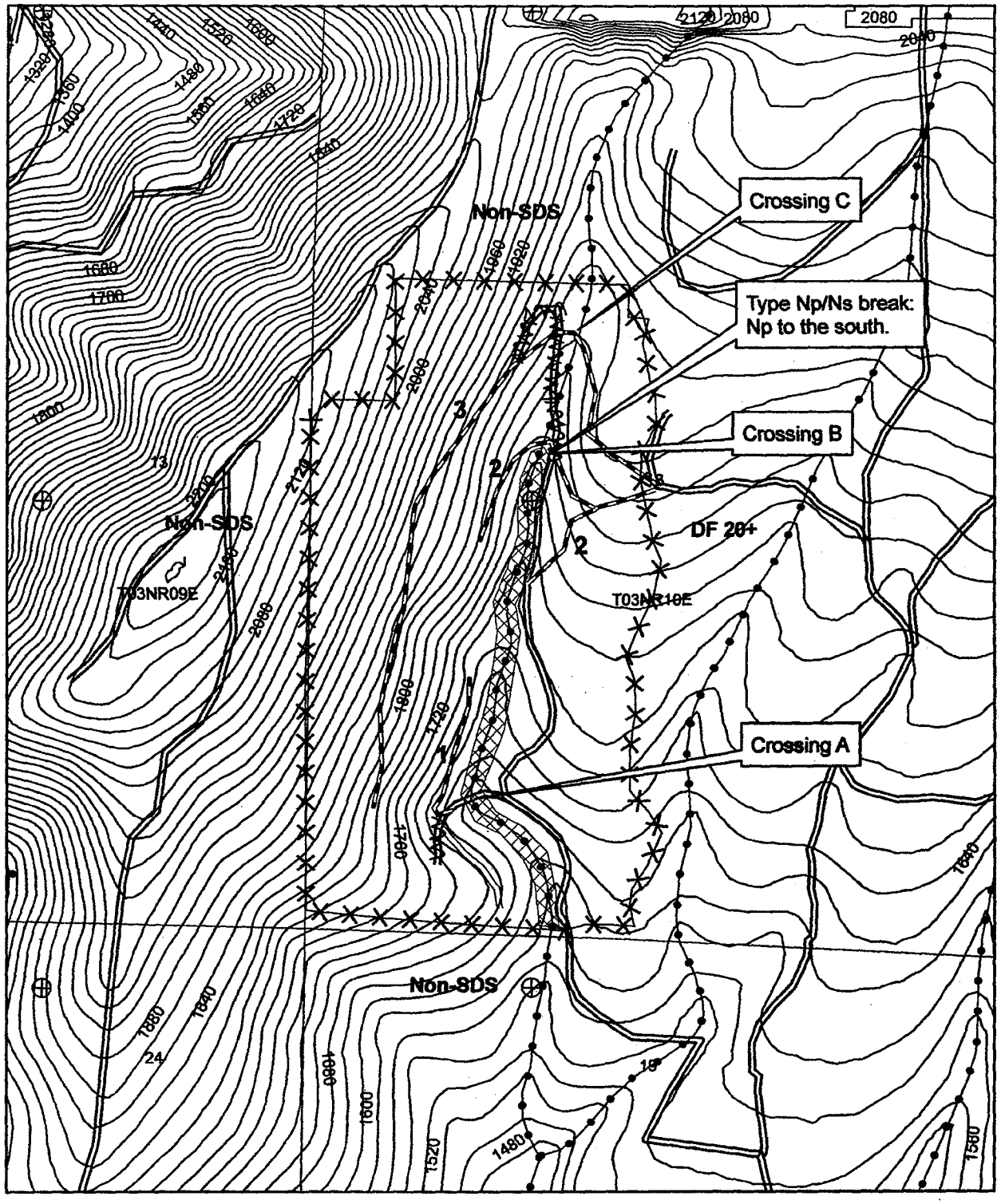
2704293

26. We acknowledge the following:
- The information on this application/notification is true.
- We understand this proposed forest practice is subject to:
  - The Forest Practices Act and Rules AND
  - All other federal, state or local regulations.
- Compliance with the Forest Practices Act and Rules does not ensure compliance with the Endangered Species Act or other federal, state or local laws.
- If we said that we would not convert the land to non-forestry use, the county or city may deny development permits on this parcel for the next 6 years.
- The following may result in an unauthorized incidental take of certain endangered or threatened fish species:
  - Conversion of land to non-forestry use.
  - Harvesting within the maximum RMZ on a 20-acre exempt parcel that was acquired after June 5, 2006.

Signature of LANDOWNER*	Signature of TIMBER OWNER (If different than landowner)	Signature of OPERATOR (If different than landowner)
Print Name: SAM GRIMM	Print Name:	Print Name:
Date: 8.22.06	Date:	Date:

NOTE: If you are a "Perpetual Timber Rights Owner," and are submitting this without the Landowner's Signature, provide written evidence the landowner has been notified.

FERN 2704293



2704293

SDS Lumber Company
P.O. Box 266
Bingen, WA 98605
(509) 493-2155-phone
(509) 493-2535-fax

NOTICE

TO: FOREST PRACTICE REVIEWERS

FROM: SDS MANAGEMENT

SUBJECT: ACCESS POLICY

SDS maintains strict policy regarding access and use on all company-owned lands. Other than Washington Department of Natural Resources Forest Practice officials, ALL OTHER PERSONS MUST HAVE SPECIFIC WRITTEN PERMISSION to enter upon SDS lands for review of forest practice activities; this includes, but is not limited to WDFW, USFW, NSA, and any/all special interest group personnel or interested public individuals. Receipt of FPARS information **does not** give access permission to private property. Permission will be granted strictly by SDS Management on a case by case basis. In the event that an individual and/or agency is granted permission to enter SDS property, no member or individual shall enter said property without being accompanied by an SDS representative. Please contact Frank Backus at 509-493-6101 for any access related information.

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4 Sided RMZ total trees

FERN PERMIT: Total Tree Count/BA In RMZ

tree	spp	dbh	BA
1	ra	15	1.22715
2	ra	19	1.968894
3	ra	19	1.968894
4	ra	15	1.22715
5	ra	16	1.396224
6	ra	14	1.068984
7	ra	17	1.576206
8	ra	17	1.576206
9	ra	12	0.785376
10	ra	12	0.785376
11	ra	16	1.396224
12	df	18	1.767096
13	ra	24	3.141504
14	bm	16	1.396224
15	bm	17	1.576206
16	bm	15	1.22715
17	bm	17	1.576206
18	df	30	4.9086
19	ra	13	0.921726
20	ra	12	0.785376
21	bm	13	0.921726
22	ra	13	0.921726
23	bm	13	0.921726
24	df	37	7.466526
25	ra	10	0.5454
26	ra	13	0.921726
27	df	12	0.785376
28	bm	11	0.659934
29	bm	15	1.22715
30	df	36	7.068384
31	df	28	4.275936
32	df	40	8.7264
33	df	33	5.939406
34	bm	15	1.22715
35	bm	16	1.396224
36	df	33	5.939406
37	df	26	3.686904
38	df	24	3.141504
39	df	26	3.686904
40	df	24	3.141504
41	bm	16	1.396224
42	bm	11	0.659934
43	df	14	1.068984
44	df	11	0.659934
45	df	26	3.686904
46	df	13	0.921726

RMZ:	4.6 Ac
Total BA:	2415
BA/Ac:	525

47	df	26	3.686904		96	gf	24	3.141504
48	bm	15	1.22715		97	gf	26	3.686904
49	bm	14	1.068984		98	bm	12	0.785376
50	bm	13	0.921726		99	ra	22	2.639736
51	df	16	1.396224		100	bm	17	1.576206
52	ra	12	0.785376		101	ra	17	1.576206
53	ra	12	0.785376		102	df	26	3.686904
54	ra	15	1.22715		103	rc	54	15.90386
55	ra	10	0.5454		104	ra	13	0.921726
56	ra	16	1.396224		105	ra	16	1.396224
57	ra	16	1.396224		106	rc	12	0.785376
58	df	33	5.939406		107	gf	27	3.975966
59	rc	24	3.141504		108	bm	12	0.785376
60	df	35	6.68115		109	bm	10	0.5454
61	df	42	9.620856		110	df	31	5.241294
62	df	15	1.22715		111	bm	15	1.22715
63	df	29	4.586814		112	bm	11	0.659934
64	df	29	4.586814		113	rc	12	0.785376
65	df	35	6.68115		114	rc	21	2.405214
66	df	40	8.7264		115	rc	26	3.686904
67	bm	13	0.921726		116	df	33	5.939406
68	bm	14	1.068984		117	df	22	2.639736
69	bm	11	0.659934		118	rc	10	0.5454
70	df	26	3.686904		119	rc	11	0.659934
71	gf	22	2.639736		120	rc	21	2.405214
72	gf	11	0.659934		121	rc	22	2.639736
73	bm	11	0.659934		122	df	23	2.885166
74	gf	32	5.584896		123	ra	15	1.22715
75	df	12	0.785376		124	ra	11	0.659934
76	df	26	3.686904		125	df	60	19.6344
77	gf	14	1.068984		126	rc	15	1.22715
78	df	27	3.975966		127	rc	37	7.466526
79	df	37	7.466526		128	ra	25	3.40875
80	gf	35	6.68115		129	rc	22	2.639736
81	gf	10	0.5454		130	ra	22	2.639736
82	df	34	6.304824		131	ra	20	2.1816
83	rc	50	13.635		132	ra	17	1.576206
84	rc	11	0.659934		133	gf	22	2.639736
85	ra	23	2.885166		134	df	11	0.659934
86	ra	17	1.576206		135	df	10	0.5454
87	ra	12	0.785376		136	gf	19	1.968894
88	ra	19	1.968894		137	gf	14	1.068984
89	ra	14	1.068984		138	gf	11	0.659934
90	ra	24	3.141504		139	gf	12	0.785376
91	df	21	2.405214		140	gf	11	0.659934
92	bm	17	1.576206		141	ra	22	2.639736
93	bm	12	0.785376		142	ra	19	1.968894
94	gf	21	2.405214		143	ra	16	1.396224
95	gf	27	3.975966		144	ra	14	1.068984

145	ra	14	1.068984			194	gf	15	1.22715
146	gf	15	1.22715			195	df	20	2.1816
147	gf	21	2.405214			196	bm	18	1.767096
148	gf	11	0.659934			197	df	22	2.639736
149	bm	12	0.785376			198	gf	20	2.1816
150	bm	13	0.921726			199	bm	15	1.22715
151	bm	11	0.659934			200	bm	11	0.659934
152	gf	10	0.5454			201	bm	12	0.785376
153	df	16	1.396224			202	df	16	1.396224
154	df	10	0.5454			203	bm	14	1.068984
155	ra	21	2.405214			204	df	10	0.5454
156	ra	16	1.396224			205	df	6	0.196344
157	ra	13	0.921726			206	df	8	0.349056
158	gf	12	0.785376			207	df	6	0.196344
159	df	20	2.1816			208	df	19	1.968894
160	gf	14	1.068984			209	df	12	0.785376
161	ra	16	1.396224			210	df	12	0.785376
162	df	28	4.275936			211	df	16	1.396224
163	gf	22	2.639736			212	df	20	2.1816
164	df	18	1.767096			213	df	25	3.40875
165	df	14	1.068984			214	df	21	2.405214
166	df	24	3.141504			215	bm	11	0.659934
167	df	19	1.968894			216	df	27	3.975966
168	gf	24	3.141504			217	bm	16	1.396224
169	gf	11	0.659934			218	df	14	1.068984
170	gf	18	1.767096			219	df	6	0.196344
171	df	12	0.785376			220	df	10	0.5454
172	gf	12	0.785376			221	gf	14	1.068984
173	df	42	9.620856			222	gf	18	1.767096
174	df	10	0.5454			223	df	27	3.975966
175	df	11	0.659934			224	df	16	1.396224
176	ra	17	1.576206			225	df	18	1.767096
177	ra	16	1.396224			226	df	26	3.686904
178	gf	11	0.659934			227	df	18	1.767096
179	df	10	0.5454			228	bm	11	0.659934
180	ra	19	1.968894			229	df	14	1.068984
181	df	11	0.659934			230	df	14	1.068984
182	df	25	3.40875			231	df	11	0.659934
183	gf	10	0.5454			232	df	17	1.576206
184	df	11	0.659934			233	df	8	0.349056
185	gf	14	1.068984			234	df	16	1.396224
186	df	22	2.639736			235	df	26	3.686904
187	gf	11	0.659934			236	df	19	1.968894
188	df	23	2.885166			237	df	16	1.396224
189	df	18	1.767096			238	df	13	0.921726
190	df	14	1.068984			239	df	14	1.068984
191	df	24	3.141504			240	df	10	0.5454
192	ra	15	1.22715			241	df	12	0.785376
193	ra	10	0.5454			242	df	20	2.1816

243	df	9	0.441774		292	bm	12	0.785376
244	df	11	0.659934		293	df	11	0.659934
245	df	8	0.349056		294	df	12	0.785376
246	df	18	1.767096		295	df	21	2.405214
247	df	14	1.068984		296	df	10	0.5454
248	df	20	2.1816		297	df	18	1.767096
249	df	7	0.267246		298	df	12	0.785376
250	df	6	0.196344		299	df	15	1.22715
251	df	20	2.1816		300	df	21	2.405214
252	df	10	0.5454		301	df	22	2.639736
253	df	14	1.068984		302	bm	11	0.659934
254	df	10	0.5454		303	df	24	3.141504
255	df	6	0.196344		304	df	11	0.659934
256	df	21	2.405214		305	bm	8	0.349056
257	df	16	1.396224		306	ra	16	1.396224
258	df	22	2.639736		307	ra	13	0.921726
259	df	10	0.5454		308	df	11	0.659934
260	df	22	2.639736		309	df	9	0.441774
261	df	25	3.40875		310	df	7	0.267246
262	df	10	0.5454		311	df	11	0.659934
263	df	22	2.639736		312	df	12	0.785376
264	df	19	1.968894		313	df	17	1.576206
265	df	10	0.5454		314	bm	8	0.349056
266	df	21	2.405214		315	bm	12	0.785376
267	df	10	0.5454		316	bm	7	0.267246
268	df	21	2.405214		317	df	16	1.396224
269	bm	9	0.441774		318	df	14	1.068984
270	bm	9	0.441774		319	gf	9	0.441774
271	df	22	2.639736		320	df	19	1.968894
272	df	26	3.686904		321	df	18	1.767096
273	df	17	1.576206		322	df	18	1.767096
274	df	21	2.405214		323	bm	9	0.441774
275	df	9	0.441774		324	bm	9	0.441774
276	df	15	1.22715		325	df	17	1.576206
277	df	9	0.441774		326	bm	16	1.396224
278	df	11	0.659934		327	bm	6	0.196344
279	ra	16	1.396224		328	bm	8	0.349056
280	df	10	0.5454		329	bm	6	0.196344
281	bm	6	0.196344		330	bm	6	0.196344
282	bm	10	0.5454		331	bm	7	0.267246
283	bm	23	436.8054		332	bm	9	0.441774
284	bm	24	439.8978		333	df	11	0.659934
285	bm	12	0.785376		334	df	12	0.785376
286	df	15	1.22715		335	df	9	0.441774
287	bm	6	0.196344		336	df	11	0.659934
288	df	15	1.22715		337	df	15	1.22715
289	df	16	1.396224		338	df	11	0.659934
290	df	23	2.885166		339	df	14	1.068984
291	bm	13	0.921726		340	bm	7	0.267246

341	bm	10	0.5454		390	bm	8	0.349056
342	bm	11	0.659934		391	bm	6	0.196344
343	df	15	1.22715		392	bm	8	0.349056
344	bm	10	0.5454		393	bm	7	0.267246
345	bm	7	0.267246		394	bm	11	0.659934
346	bm	8	0.349056		395	bm	8	0.349056
347	bm	9	0.441774		396	bm	12	0.785376
348	bm	9	0.441774		397	bm	8	0.349056
349	bm	9	0.441774		398	bm	8	0.349056
350	df	16	1.396224		399	bm	6	0.196344
351	df	11	0.659934		400	bm	11	0.659934
352	df	34	6.304824		401	bm	10	0.5454
353	df	29	4.586814		402	bm	12	0.785376
354	rc	19	1.968894		403	ra	12	0.785376
355	bm	16	1.396224		404	bm	8	0.349056
356	df	29	4.586814		405	bm	6	0.196344
357	df	32	5.584896		406	df	35	6.68115
358	df	34	6.304824		407	df	32	5.584896
359	bm	8	0.349056		408	df	38	7.875576
360	bm	8	0.349056		409	df	26	3.686904
361	df	36	7.068384		410	df	31	5.241294
362	df	32	5.584896		411	gf	9	0.441774
363	bm	13	0.921726		412	bm	6	0.196344
364	bm	10	0.5454		413	bm	6	0.196344
365	bm	7	0.267246		414	bm	8	0.349056
366	bm	8	0.349056		415	df	27	3.975966
367	bm	8	0.349056		416	df	36	7.068384
368	df	26	3.686904		417	df	14	1.068984
369	bm	11	0.659934		418	df	28	4.275936
370	df	32	5.584896		419	df	32	5.584896
371	df	8	0.349056		420	df	28	4.275936
372	df	33	5.939406		421	df	9	0.441774
373	df	17	1.576206		422	df	33	5.939406
374	df	30	4.9086		423	bm	6	0.196344
375	df	30	4.9086		424	bm	6	0.196344
376	df	36	7.068384		425	bm	6	0.196344
377	df	28	4.275936		426	df	36	7.068384
378	df	15	1.22715		427	bm	16	1.396224
379	df	27	3.975966		428	gf	24	3.141504
380	df	33	5.939406		429	df	40	8.7264
381	df	27	3.975966		430	bm	13	0.921726
382	bm	14	1.068984		431	bm	11	0.659934
383	bm	16	1.396224		432	df	26	3.686904
384	bm	9	0.441774		433	df	18	1.767096
385	bm	6	0.196344		434	df	16	1.396224
386	bm	9	0.441774		435	df	18	1.767096
387	bm	8	0.349056		436	df	31	5.241294
388	df	6	0.196344		437	df	28	4.275936
389	bm	6	0.196344		438	df	14	1.068984

439	df	25	3.40875			488	df	9	0.441774
440	df	7	0.267246			489	bm	9	0.441774
441	df	15	1.22715			490	df	23	2.885166
442	wh	31	5.241294			491	df	22	2.639736
443	bm	10	0.5454			492	df	12	0.785376
444	bm	10	0.5454			493	df	11	0.659934
445	ra	13	0.921726			494	df	13	0.921726
446	ra	10	0.5454			495	gf	22	2.639736
447	bm	14	1.068984			496	df	14	1.068984
448	df	28	4.275936			497	df	18	1.767096
449	gf	17	1.576206			498	df	25	3.40875
450	gf	12	0.785376			499	df	22	2.639736
451	df	28	4.275936			500	gf	17	1.576206
452	df	21	2.405214			501	df	12	0.785376
453	gf	18	1.767096			502	df	7	0.267246
454	gf	15	1.22715			503	df	14	1.068984
455	df	16	1.396224			504	df	21	2.405214
456	df	18	1.767096			505	df	21	2.405214
457	df	14	1.068984			506	df	14	1.068984
458	gf	21	2.405214			507	df	24	3.141504
459	df	14	1.068984			508	df	11	0.659934
460	df	24	3.141504			509	df	10	0.5454
461	bm	10	0.5454			510	df	19	1.968894
462	bm	11	0.659934			511	df	10	0.5454
463	df	26	3.686904			512	df	20	2.1816
464	ra	23	2.885166			513	df	14	1.068984
465	ra	9	0.441774			514	gf	13	0.921726
466	ra	15	1.22715			515	df	26	3.686904
467	ra	25	3.40875			516	df	8	0.349056
468	df	27	3.975966			517	bm	6	0.196344
469	gf	15	1.22715			518	bm	8	0.349056
470	gf	15	1.22715			519	bm	10	0.5454
471	bm	9	0.441774			520	df	26	3.686904
472	bm	8	0.349056			521	df	7	0.267246
473	bm	11	0.659934			522	df	14	1.068984
474	bm	10	0.5454			523	df	9	0.441774
475	df	26	3.686904			524	df	14	1.068984
476	bm	10	0.5454			525	df	10	0.5454
477	bm	7	0.267246			526	df	11	0.659934
478	df	17	1.576206			527	gf	11	0.659934
479	df	12	0.785376			528	gf	13	0.921726
480	df	13	0.921726			529	df	12	0.785376
481	gf	10	0.5454			530	df	16	1.396224
482	gf	6	0.196344			531	gf	16	1.396224
483	gf	19	1.968894			532	gf	16	1.396224
484	df	18	1.767096			533	df	8	0.349056
485	gf	22	2.639736			534	df	16	1.396224
486	df	7	0.267246			535	df	9	0.441774
487	bm	8	0.349056			536	df	21	2.405214

537	gf	13	0.921726		586	df	18	1.767096
538	df	18	1.767096		587	df	15	1.22715
539	gf	20	2.1816		588	df	15	1.22715
540	gf	18	1.767096		589	bm	15	1.22715
541	gf	18	1.767096		590	df	10	0.5454
542	gf	8	0.349056		591	gf	8	0.349056
543	df	22	2.639736		592	gf	18	1.767096
544	gf	15	1.22715		593	gf	10	0.5454
545	df	11	0.659934		594	gf	14	1.068984
546	df	19	1.968894		595	gf	17	1.576206
547	gf	12	0.785376		596	gf	17	1.576206
548	df	20	2.1816		597	gf	12	0.785376
549	df	18	1.767096		598	gf	16	1.396224
550	df	14	1.068984		599	gf	11	0.659934
551	df	14	1.068984		600	gf	2	0.021816
552	df	9	0.441774		601	gf	9	0.441774
553	gf	18	1.767096		602	gf	15	1.22715
554	gf	16	1.396224		603	ra	13	0.921726
555	gf	12	0.785376		604	ra	14	1.068984
556	df	10	0.5454		605	gf	10	0.5454
557	gf	11	0.659934		606	ra	14	1.068984
558	df	7	0.267246		607	ra	11	0.659934
559	df	20	2.1816		608	bm	13	0.921726
560	df	11	0.659934		609	bm	12	0.785376
561	gf	10	0.5454		610	bm	12	0.785376
562	df	14	1.068984		611	gf	24	3.141504
563	df	12	0.785376		612	gf	10	0.5454
564	gf	17	1.576206		613	gf	11	0.659934
565	gf	17	1.576206		614	gf	18	1.767096
566	df	11	0.659934		615	gf	19	1.968894
567	df	14	1.068984		616	bm	9	0.441774
568	gf	10	0.5454		617	bm	9	0.441774
569	df	18	1.767096		618	bm	9	0.441774
570	df	16	1.396224		619	bm	9	0.441774
571	df	9	0.441774		620	df	17	1.576206
572	df	16	1.396224		621	bm	11	0.659934
573	df	10	0.5454		622	bm	8	0.349056
574	df	14	1.068984		623	gf	8	0.349056
575	df	12	0.785376		624	gf	11	0.659934
576	df	13	0.921726		625	gf	9	0.441774
577	df	11	0.659934		626	gf	15	1.22715
578	gf	14	1.068984		627	gf	12	0.785376
579	df	8	0.349056		628	gf	15	1.22715
580	gf	9	0.441774		629	gf	10	0.5454
581	df	18	1.767096		630	gf	14	1.068984
582	df	9	0.441774		631	gf	10	0.5454
583	df	17	1.576206		632	gf	16	1.396224
584	df	15	1.22715		633	gf	8	0.349056
585	df	16	1.396224		634	gf	16	1.396224

635	gf	9	0.441774		684	gf	16	1.396224
636	gf	11	0.659934		685	bm	22	2.639736
637	df	18	1.767096		686	df	22	2.639736
638	gf	20	2.1816		687	ra	20	2.1816
639	gf	13	0.921726		688	rc	18	1.767096
640	gf	17	1.576206		689	df	37	7.466526
641	gf	17	1.576206		690	rc	20	2.1816
642	gf	16	1.396224		691	rc	30	4.9086
643	gf	9	0.441774		692	gf	25	3.40875
644	gf	16	1.396224		693	gf	16	1.396224
645	df	20	2.1816		694	gf	22	2.639736
646	gf	11	0.659934		695	gf	14	1.068984
647	bm	8	0.349056		696	rc	55	16.49835
648	bm	10	0.5454		697	bm	16	1.396224
649	df	14	1.068984		698	bm	18	1.767096
650	gf	11	0.659934		699	ra	14	1.068984
651	gf	18	1.767096		700	ra	9	0.441774
652	rc	6	0.196344		701	ra	20	2.1816
653	rc	7	0.267246		702	ra	15	1.22715
654	ra	12	0.785376		703	ra	18	1.767096
655	rc	32	5.584896		704	ra	19	1.968894
656	bm	14	1.068984		705	bm	13	0.921726
657	bm	7	0.267246		706	bm	12	0.785376
658	rc	14	1.068984		707	bm	11	0.659934
659	ra	11	0.659934		708	bm	21	2.405214
660	bm	14	1.068984		709	ra	10	0.5454
661	bm	11	0.659934		710	bm	35	6.68115
662	rc	8	0.349056		711	bm	9	0.441774
663	bm	8	0.349056		712	rc	13	0.921726
664	bm	9	0.441774		713	df	35	6.68115
665	gf	11	0.659934		714	df	38	7.875576
666	rc	12	0.785376		715	ra	24	3.141504
667	gf	21	2.405214		716	bm	14	1.068984
668	ra	14	1.068984		717	rc	9	0.441774
669	rc	30	4.9086		718	bm	15	1.22715
670	ra	16	1.396224		719	df	56	17.10374
671	gf	24	3.141504		720	df	14	1.068984
672	bm	10	0.5454		721	df	32	5.584896
673	rc	8	0.349056		722	gf	8	0.349056
674	bm	6	0.196344		723	rc	10	0.5454
675	bm	13	0.921726		724	rc	7	0.267246
676	bm	12	0.785376		725	df	16	1.396224
677	bm	13	0.921726		726	df	36	7.068384
678	bm	9	0.441774		727	df	19	1.968894
679	ra	23	2.885166		728	df	18	1.767096
680	rc	26	3.686904		729	df	23	2.885166
681	rc	31	5.241294		730	df	34	6.304824
682	rc	38	7.875576		731	rc	18	1.767096
683	rc	16	1.396224		732	df	22	2.639736

733	df	36	7.068384			782	bm	16	1.396224
734	rc	7	0.267246			783	bm	12	0.785376
735	df	28	4.275936			784	df	43	10.08445
736	df	18	1.767096			785	df	28	4.275936
737	bm	14	1.068984			786	ra	11	0.659934
738	rc	14	1.068984			787	df	33	5.939406
739	bm	11	0.659934			788	df	24	3.141504
740	bm	10	0.5454			789	df	10	0.5454
741	bm	14	1.068984			790	df	17	1.576206
742	ra	23	2.885166			791	df	23	2.885166
743	bm	13	0.921726			792	df	16	1.396224
744	bm	13	0.921726			793	df	22	2.639736
745	bm	15	1.22715			794	df	27	3.975966
746	ra	14	1.068984			795	df	33	5.939406
747	ra	11	0.659934			796	df	34	6.304824
748	df	10	0.5454			797	df	28	4.275936
749	ra	17	1.576206			798	df	16	1.396224
750	ra	11	0.659934			799	bm	10	0.5454
751	bc	38	7.875576			800	df	14	1.068984
752	bm	8	0.349056			801	df	37	7.466526
753	df	8	0.349056			802	bm	17	1.576206
754	bm	12	0.785376			803	bm	20	2.1816
755	ra	14	1.068984			804	bm	22	2.639736
756	df	21	2.405214			805	bm	16	1.396224
757	df	15	1.22715			806	bm	16	1.396224
758	df	22	2.639736			807	df	30	4.9086
759	df	15	1.22715			808	bm	12	0.785376
760	df	23	2.885166			809	bm	14	1.068984
761	df	18	1.767096			810	bm	11	0.659934
762	gf	9	0.441774			811	ra	11	0.659934
763	gf	11	0.659934			812	bm	16	1.396224
764	bm	10	0.5454			813	bm	16	1.396224
765	bm	11	0.659934			814	df	12	0.785376
766	bm	11	0.659934			815	df	16	1.396224
767	df	19	1.968894			816	df	31	5.241294
768	rc	11	0.659934			817	df	18	1.767096
769	df	21	2.405214			818	gf	10	0.5454
770	df	32	5.584896			819	df	36	7.068384
771	ra	9	0.441774			820	df	16	1.396224
772	df	10	0.5454			821	df	24	3.141504
773	wh	11	0.659934			822	df	18	1.767096
774	bm	16	1.396224			823	bm	10	0.5454
775	df	30	4.9086			824	df	20	2.1816
776	ra	23	2.885166			825	df	22	2.639736
777	df	22	2.639736			826	df	20	2.1816
778	bm	14	1.068984			827	df	20	2.1816
779	bm	14	1.068984			828	bm	24	3.141504
780	bm	16	1.396224			829	bm	16	1.396224
781	bm	10	0.5454			830	df	16	1.396224

* Page Seperation

Total Leave Trees

2704293

FERN PERMIT: Np Harvest BA Calcs/10 Largest TPA										
tree	spp	dbh	BA							
125	df	60	19.6344							
719	df	56	17.10374							
696	rc	55	16.49835							
103	rc	54	15.90386							
83	rc	50	13.635							
784	df	43	10.08445							
61	df	42	9.620856							
173	df	42	9.620856							
32	df	40	8.7264							
66	df	40	8.7264							
429	df	40	8.7264							
408	df	38	7.875576							
682	rc	38	7.875576							
714	df	38	7.875576							
751	bc	38	7.875576							
24	df	37	7.466526							
79	df	37	7.466526							
127	rc	37	7.466526							
689	df	37	7.466526							
801	df	37	7.466526							
30	df	36	7.068384							
361	df	36	7.068384							
376	df	36	7.068384							
416	df	36	7.068384							
426	df	36	7.068384							
726	df	36	7.068384							
733	df	36	7.068384							
819	df	36	7.068384							
60	df	35	6.68115							
65	df	35	6.68115							
80	gf	35	6.68115							
406	df	35	6.68115							
710	bm	35	6.68115							
713	df	35	6.68115							
82	df	34	6.304824							
352	df	34	6.304824							
358	df	34	6.304824							
730	df	34	6.304824							
796	df	34	6.304824							
33	df	33	5.939406							
36	df	33	5.939406							
58	df	33	5.939406							
116	df	33	5.939406							
372	df	33	5.939406							
380	df	33	5.939406							
795	df	33	5.939406							
46 Trees			376.85							

82BA/acre left post harvest

2704293

FERN PERMIT: Required Leave Trees as per WAC 222-30-022; 2., (b), (I),(C), (II).			
tree	spp	dbh	BA
1	ra	15	1.22715
8	ra	17	1.576206
9	ra	12	0.785376
12	df	18	1.767096
13	ra	24	3.141504
16	bm	15	1.22715
17	bm	17	1.576206
18	df	30	4.9086
19	ra	13	0.921726
20	ra	12	0.785376
34	bm	15	1.22715
35	bm	16	1.396224
52	ra	12	0.785376
53	ra	12	0.785376
54	ra	15	1.22715
55	ra	10	0.5454
56	ra	16	1.396224
68	bm	14	1.068984
69	bm	11	0.659934
83	rc	50	13.635
84	rc	11	0.659934
85	ra	23	2.885166
86	ra	17	1.576206
87	ra	12	0.785376
101	ra	17	1.576206
105	ra	16	1.396224
116	df	33	5.939406
129	rc	22	2.639736
130	ra	22	2.639736
131	ra	20	2.1816
141	ra	22	2.639736
142	ra	19	1.968894
144	ra	14	1.068984
145	ra	14	1.068984
149	bm	12	0.785376
153	df	16	1.396224
154	df	10	0.5454
155	ra	21	2.405214
156	ra	16	1.396224
157	ra	13	0.921726
176	ra	17	1.576206
177	ra	16	1.396224
178	gf	11	0.659934
180	ra	19	1.968894
192	ra	15	1.22715
193	ra	10	0.5454

194	gf	15	1.22715						
195	df	20	2.1816						
227	df	18	1.767096						
228	bm	11	0.659934						
230	df	14	1.068984						
231	df	11	0.659934						
232	df	17	1.576206						
234	df	16	1.396224						
235	df	26	3.686904						
236	df	19	1.968894						
260	df	22	2.639736						
261	df	25	3.40875						
262	df	10	0.5454						
263	df	22	2.639736						
264	df	19	1.968894						
266	df	21	2.405214						
270	bm	9	0.441774						
279	ra	16	1.396224						
280	df	10	0.5454						
306	ra	16	1.396224						
307	ra	13	0.921726						
311	df	11	0.659934						
326	bm	16	1.396224						
355	bm	16	1.396224						
358	df	34	6.304824						
359	bm	8	0.349056						
360	bm	8	0.349056						
379	df	27	3.975966						
381	df	27	3.975966						
382	bm	14	1.068984						
383	bm	16	1.396224						
397	bm	8	0.349056						
398	bm	8	0.349056						
399	bm	6	0.196344						
401	bm	10	0.5454						
402	bm	12	0.785376						
406	df	35	6.68115						
408	df	38	7.875576						
411	gf	9	0.441774						
412	bm	6	0.196344						
413	bm	6	0.196344						
414	bm	8	0.349056						
423	bm	6	0.196344						
424	bm	6	0.196344						
425	bm	6	0.196344						
426	df	36	7.068384						
442	wh	31	5.241294						
443	bm	10	0.5454						
444	bm	10	0.5454						

445	ra	13	0.921726						
446	ra	10	0.5454						
447	bm	14	1.068984						
448	df	28	4.275936						
461	bm	10	0.5454						
462	bm	11	0.659934						
463	df	26	3.686904						
464	ra	23	2.885166						
465	ra	9	0.441774						
466	ra	15	1.22715						
467	ra	25	3.40875						
505	df	21	2.405214						
506	df	14	1.068984						
508	df	11	0.659934						
509	df	10	0.5454						
510	df	19	1.968894						
542	gf	8	0.349056						
543	df	22	2.639736						
567	df	14	1.068984						
606	ra	14	1.068984						
607	ra	11	0.659934						
616	bm	9	0.441774						
617	bm	9	0.441774						
618	bm	9	0.441774						
619	bm	9	0.441774						
631	gf	10	0.5454						
632	gf	16	1.396224						
659	ra	11	0.659934						
660	bm	14	1.068984						
661	bm	11	0.659934						
662	rc	8	0.349056						
663	bm	8	0.349056						
664	bm	9	0.441774						
665	gf	11	0.659934						
666	rc	12	0.785376						
667	gf	21	2.405214						
668	ra	14	1.068984						
669	rc	30	4.9086						
670	ra	16	1.396224						
679	ra	23	2.885166						
689	df	37	7.466526						
690	rc	20	2.1816						
691	rc	30	4.9086						
699	ra	14	1.068984						
700	ra	9	0.441774						
701	ra	20	2.1816						
702	ra	15	1.22715						
703	ra	18	1.767096						
704	ra	19	1.968894						

2704293

710	bm	35	6.68115						
717	rc	9	0.441774						
718	bm	15	1.22715						
719	df	56	17.10374						
720	df	14	1.068984						
722	gf	8	0.349056						
732	df	22	2.639736						
733	df	36	7.068384						
734	rc	7	0.267246						
737	bm	14	1.068984						
739	bm	11	0.659934						
740	bm	10	0.5454						
741	bm	14	1.068984						
742	ra	23	2.885166						
743	bm	13	0.921726						
744	bm	13	0.921726						
745	bm	15	1.22715						
746	ra	14	1.068984						
747	ra	11	0.659934						
748	df	10	0.5454						
749	ra	17	1.576206						
750	ra	11	0.659934						
751	bc	38	7.875576						
752	bm	8	0.349056						
753	df	8	0.349056						
754	bm	12	0.785376						
755	ra	14	1.068984						
756	df	21	2.405214						
765	bm	11	0.659934						
766	bm	11	0.659934						
776	ra	23	2.885166						
778	bm	14	1.068984						
779	bm	14	1.068984						
780	bm	16	1.396224						
781	bm	10	0.5454						
782	bm	16	1.396224						
783	bm	12	0.785376						
807	df	30	4.9086						
811	ra	11	0.659934						
812	bm	16	1.396224						
813	bm	16	1.396224						
814	df	12	0.785376						
815	df	16	1.396224						
816	df	31	5.241294						
819	df	36	7.068384						
189 Trees			**345.293**						

75BA/9COE left Post Uphill

WASHINGTON STATE DEPARTMENT OF
Natural Resources

Forest Practices Application/Notification

Notice of Decision

FPA/N No: 2704293
Effective Date: 10/03/2008
Expiration Date: 10/03/2010
Shut Down Zone: 660
EARR Tax Credit: [x] Eligible [ ] Non-eligible
Reference:

Decision

[ ] Notification Operations shall not begin before the effective date.
[x] Approved This Forest Practices Application is subject to the conditions listed below.
[ ] Disapproved This Forest Practices Application is disapproved for the reasons listed below.
[ ] Closed Applicant has withdrawn approved FPA/N

FPA/N Classification

[ ] Class II [x] Class III [ ] Class IVG [ ] Class IVS

Number of Years Granted on Multi-Year Request

[ ] 2 yrs [ ] 3 yrs [ ] 4 yrs [ ] 5 yrs

Conditions on Approval / Reasons for Disapproval

I approve this with the following:

3 crossings are proposed on the application. Provisions for the use of ford crossings are covered in WAC 222-24-040(5). Conditions of the ford crossing will include:
1. Only be used during periods of low water.
2. Base rock will be required on each approach. A minimum of 50'in length and 6" in depth on each side.
3. A hydraulic project approval (HPA) may be required by the Washington Department of Fish and Wildlife on Type S and F watercourses.
4. If water quality is threatened due to the use of the fords an alternate crossing installation will be required.

An existing road runs parallel to the typed watercourse. Use of this road is authorized for hauling purposes only. Skidding of logs along this road will require on-site approval by the DNR. Segments of the road are located within the buffer of the watercourse and pose a potential to deliver sediment into a public resource. The areas of the road that are within the RMZ shall be rocked to a minimum depth of 6 inches. Disturbance to vegetation will be minimized in this area with hand cutting of vegetation along the right-of-way (no pulling of grubbing of stumps). Minimize blade work and no sidecasting of material toward the typed water. (WAC 222-24-052).

In-stream Operations (Type Np or Ns)
1. The project may begin June 15 and shall be completed by October 15.
2. Work shall conform to plans and specifications contained in this forest practice application.
3. Culvert size shall be equal to or greater than bank full width.
4. The culvert shall be installed to pass the 100-year peak flow with consideration of passing the debris likely to be encountered.

Issued By: Jon Paul Anderson **Region:** Southeast

Title: Forester **Date:** 10/03/2008

Copies to: **[x] Landowner, Timber Owner and Operator.**

Appeal Information

You have 30 calendar days to appeal this Decision and any related State Environmental Policy Act determinations to the Forest Practices Appeals Board. You must follow the requirements of RCW 76.09.220(8) and WAC 223-08.

Certain economic development projects may have a different appeal process. RCW 43.21L and WAC 199-08 describes the alternate appeal process.

Additional information on both appeal processes is available from the Washington Environmental Hearings Office at http://www.eho.wa.gov/ or at (360) 459-6327.

Other Applicable Laws

Operating as described in this application/notification does not ensure compliance with the Endangered Species Act, or other federal, state, or local laws.

Hydraulic Project Approval (HPA) (Chapter 77.55RCW and WAC 222-50-020(2))

The Department of Fish and Wildlife (WDFW), as the jurisdictional agency issuing HPAs, has final authority for approving water crossing structures in Type S and F waters. WDFW continues to have authority on Type N waters and may exercise that authority on some Type N waters.

Notice: The HPA water crossing requirements supersede what is indicated on the FPA. Landowners are required by law to follow the provisions as directed on the HPA.

Transfer of Forest Practices Application/Notification (WAC 222-20-010)

Use the "Notice of Transfer of Approved Forest Practices Application/Notification" form. This form is available at region offices and on the Forest Practices Division website: http://www.dnr.wa.gov/forestpractices/. Notify DNR of new Operators within 48 hours.

Continuing Forest Land Obligations (RCW 76.09.060, RCW 76.09.070, RCW 76.09.390, and WAC 222-20-055)

Obligations include reforestation, road maintenance and abandonment plans, conversions of forest land to non-forestry use and/or harvest strategies on perennial non-fish habitat (Type Np) waters in Eastern Washington.

Before the sale or transfer of land or perpetual timber rights subject to continuing forest land obligations, the seller must notify the buyer of such an obligation on a form titled "Notice of Continuing Forest Land Obligation". The seller and buyer must both sign the "Notice of Continuing Forest Land Obligation" form and send it to the DNR Region Office for retention. This form is available at DNR region offices.

If the seller fails to notify the buyer about the continuing forest land obligation, the seller must pay the buyer's costs related to continuing forest land obligations, including all legal costs and reasonable attorneys' fees incurred by the buyer in enforcing the continuing forest land obligation against the seller.

Failure by the seller to send the required notice to the DNR at the time of sale will be prima facie evidence in an action by the buyer against the seller for costs related to the continuing forest land obligation prior to sale.

Scoping Comment
#360

Bhavnani, Monica (CTED)

From: David Harrison [redacted]@yahoo.com]
Sent: Monday, May 18, 2009 2:48 PM
To: CTED EFSEC
Subject: Concern about Whistling Ridge

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

As President of the Salem Audubon Society, I am writing on behalf of our 1600 members to comment on the proposed Whistling Ridge Energy Project in Skamania County, Washington.

The proposed project would cause significant adverse impacts to sensitive wildlife and plant habitat and would degrade the outstanding scenic beauty of the Columbia River Gorge National Scenic Area.

The Whistling Ridge proposal includes more than 80 wind turbines in two counties, yet the application filed with EFSEC discusses only 50 turbines in Skamania County. The EIS must review the cumulative environmental impacts of the entire project, including both the Skamania Co. and Klickitat Co. portions.

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because this project is proposed at a heavily forested site. The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to various wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. Potentially affected species include northern spotted owl, northern goshawk, multiple migratory bird species, western gray squirrel, several species of bats, mule and black-tailed deer, and elk. Several of these species are listed as sensitive or threatened in Washington State.

Locating 426-foot-tall turbines on the ridgeline of the Columbia River Gorge would also degrade the scenic values of the Gorge. The turbines would be highly visible from several designated key viewing areas within the National Scenic Area, including Interstate 84, the Historic Columbia River Highway, Cook-Underwood Road, and Panorama Point. The project would introduce highly visible industrial facilities into the natural, forested landscape, protruding above ridgelines and detracting from the natural scenic beauty of the Gorge. The wind towers would have daytime and nighttime warning lights, which would worsen the scenic impacts.

Finally, the proposed project would be located partially within the Columbia River Gorge National Scenic Area. Specifically, the applicant proposes to construct, expand, and improve more than two miles of roads within the National Scenic Area in order to haul industrial materials with gross vehicle weights of up to 53 tons. This proposal to construct and use Scenic Area lands for industrial purposes is prohibited by the National Scenic Area Act and Management Plan, and must be denied.

I support renewable energy, but am opposed to industrial-scale wind energy development within or adjacent to the Columbia River Gorge National Scenic Area.

David Harrison
[redacted]
Salem, OR 97302

Scoping Comment
#361

Bhavnani, Monica (CTED)

From: Monica R. Lash [redacted]@charter.net]
Sent: Monday, May 18, 2009 3:04 PM
To: CTED EFSEC
Subject: Opposition to Underwood Washington Wind Farm

Dear Mr. Fidsdal:

I'm writing to express my husband's and my opposition to the proposed wind farms in Underwood. This is an exceptionally beautiful part of the Columbia River Gorge and its beauty should be preserved.

There are many other far less exquisite areas in the Columbia River Gorge with equal or better winds that should be considered for this project.

Thank you for your consideration.

Monica Lash

Scoping Comment #362

Bhavnani, Monica (CTED)

From: John Audley [redacted]@rnp.org]
Sent: Monday, May 18, 2009 3:26 PM
To: CTED EFSEC
Cc: Jason S. Spadaro; Bob Kahn
Subject: RNP Comments on Whistling Ridge Energy Project

Attachments: WA_Whistling Ridge_EFSEC comments_09May18_RNP.pdf; ATT3044814.txt


WA_Whistling dge_EFSEC comme.


ATT3044814.txt (244 B)

Greetings,

RNP's comments on the Whistling Ridge project.

Renewable Northwest Project

917 SW Oak, Suite 303
Portland, OR 97205

Phone: 503.223.4544
Fax: 503.223.4554
www.RNP.org

Renewable Northwest Project

May 18, 2009

Mr. Jim Luce, Chair
Washington Energy Facility Site Evaluation Council
905 Plum Street SE, Third Floor
PO Box 43172
Olympia, Washington 98504-3172

SUBJECT: Comments on Whistling Ridge Energy Project, Application 2009-01

Dear Chair Luce,

The Renewable Northwest Project (RNP) appreciates the opportunity offer initial comments on the proposed Whistling Ridge Energy Project.

Established in 1994, RNP is a coalition of non-governmental public interest organizations, renewable energy companies and affiliated companies. Our mission is to expand the use of clean, renewable energy in the Northwest. RNP has three strategic objectives: developing and promoting policies that support renewable energy development, encouraging utilities and customer groups to invest in renewable energy, and working to get responsibly sited renewable energy projects in the ground.

RNP directly participates in siting proceedings for new renewable energy resources to ensure that proposed wind, solar, or geothermal projects are responsibly sited, particularly with respect to wildlife and habitat resources. In 2003, we supported the Washington Department of Fish and Wildlife (WDFW) wind siting guidelines and participated in the guidelines' development. In 2007 and 2008, we participated in stakeholder groups to develop the 2009 WDFW Wind Power Guidelines and the Oregon Columbia Plateau Ecoregion Wind Energy Siting and Permitting Guidelines.

The Whistling Ridge siting application contains the following critical elements:

- Multiple years (between 2004-2008) of surveys for critical species, avian migration and bats;
- Detailed habitat mapping;
- Micrositing intended to avoid sensitive plant and habitat populations, and riparian areas;
- Minimization of new road development;
- Restoration of impacted areas and noxious weed management;
- Use of Best Management Practices during project construction;
- Two years of post-construction mortality surveys;
- Establishment of a Technical Advisory Committee to work with the developer and WDFW regarding post-construction survey reviews, and;
- Proposed collaboration with WDFW regarding mitigation of potential impacts

At this time, while we compliment the applicant for preparing such an extensive proposal, until community members and other stakeholders have had an opportunity to share their views we will withhold specific comments on the proposed project.

In addition to evaluating the project's consistency with relevant federal, state and local laws, we encourage the Energy Facility Siting and Evaluation Council to consider the following potential benefits of the Whistling Ridge project:

Responding to Demand for New Renewable Energy: Both state and federal governments have begun enacting legislation designed to encourage the use of renewable energy and reduce greenhouse gas emissions. Three Pacific Northwestern states now have renewable energy standards in place. Washington's Clean Energy Initiative (I-937) requires qualified utilities to supply customers with minimum of 15 percent new renewable energy by 2020, Oregon's Renewable Energy Standard (SB 838) requires utilities to supply customers with 25 percent new renewable energy by 2025, and Montana's Renewable Energy Standard (HB 681) requires qualifying utilities to supply customers with 15 percent new renewable energy by 2015. In addition to state renewable energy standards, within the next two years most experts believe the United States Congress will set mandatory renewable energy standards.

Electricity from fossil fuels is a major contributor to the Northwest and the nation's greenhouse gas emissions. Roughly 40 percent of the Northwest's electricity comes from coal and natural gas-fired power plants. Reducing emissions in the electricity sector will be an essential component to mitigating the worst effects of climate change. Oregon has established goals to reduce greenhouse gas emissions by 10 percent below 1990 levels by 2020 and at least 75 percent below 1990 levels by 2050 (HB 3543). Executive Order 07-02 in Washington established goals to reduce greenhouse gas emissions to 1990 levels in 2020, percent below 1990 levels by 2035 and 50 percent below 1990 levels by 2050. Legislation introduced by Representatives Henry Waxman (D-CA) and Ed Markey (D-MA) bill would mandate reductions in greenhouse gas emissions by 17 percent below 2005 levels by 2020.

Utilities in the Pacific Northwest are currently responding to the growing demand for renewable energy by adding wind, solar, and geothermal-generated electricity to their portfolios. These utilities include Puget Sound Energy, Pacific Power, Idaho Power, and Portland General Electric. Public utilities in Washington have also begun buying or operating wind-generated electricity. As a utility-scale wind energy generation facility, the proposed Whistling Ridge project is expected to offer a competitively priced renewable electricity source. Increasing amounts of new renewable electricity will be needed to achieve renewable energy standards, greenhouse gas emissions reduction goals established in Oregon and Washington and future legislation at the federal level.

Stable Prices: Another reason utilities are attracted to renewable energy like wind is because the price of the electricity is stable and predictable for an extended period of time. While wind energy developers are able to sign twenty-year supply contracts at a fixed price, fossil fuels are subject to global market forces that subject customers to volatile energy prices. According to the Northwest Power and Conservation Council data, natural gas prices rose more than 180% between 2000 and 2009. Stable and predictable sources of renewable energy are good for utilities and consumers alike.

Environmental and Health Benefits: The proposed Whistling Ridge Energy Project would produce electricity without generating air or water emissions or hazardous waste. Wind energy does not deplete natural resources such as coal, oil, or gas, or cause environmental damage through resource extraction, transportation, or use. Wind power is a clean, renewable form of electricity. When wind farms are decommissioned, they leave no air pollution legacy and a minimal footprint on terrestrial surfaces.

Responsibly sited wind energy projects can help curb American's reliance upon fossil based fuels. According to the American Wind Energy Association, U.S. power plants are responsible for 70% of the sulfur dioxide, 34% of carbon dioxide, 33% nitrogen oxides, 28% of particulate matter, and 23% of toxic heavy metals. Air pollution from power plants is linked to including acid rain, premature deaths, cancer, asthma attacks and mercury accumulation in the tissue.

In summary, the proposed Whistling Ridge project has the potential to meet the region's increasing demand for reliable and affordable renewable energy, reduce greenhouse gas emissions, and reduce air pollution that negatively impacts our environment and public health.

Sincerely,

John J. Audley, Ph.D.
Deputy Director

Suzanne Leta Liou,
Senior Policy Advocate

Bhavnani, Monica (CTED)

Scoping Comment #363

From: Robert Carnahan [redacted]@gmail.com]
Sent: Monday, May 18, 2009 3:43 PM
To: CTED EFSEC
Cc: Sharon McCormack
Subject: Gorge windmills

Bad idea to locate along White Salmon River, heart of Scenic Columbia Gorge. Too much political influence and lobbying by SDS. They already control too much development and don't need more subsidized investment. There are better locations, windy'er in Klickitat county that can access power distribution. Greed, influence, and corporate subsidization appear to continue to rule. The voters and taxpayers get no voice, taxes grow, infrastructure grows in spite of elections, no transparency. What else can we do? It grows tiring to vote and see no change, it must start at the County level and move upward nationwide. Can't we start here by saying no to an entrenched family monopoly business in Klickitat and Skamania counties, Even the town of Stevenson bears the family name and they are dominant property owner developers in Hood River, OR a town that will be blighted by the vision of tens of Windmills? R.D. Carnahan, Home owner in White Salmon, WA, and small business owner Hood River OR.

Scoping Comment #364

Bhavnani, Monica (CTED)

From: Nathan Baker [redacted]@gorgefriends.org]
Sent: Monday, May 18, 2009 4:06 PM
To: Fiksdal, Allen (CTED)
Cc: CTED EFSEC; comment@bpa.gov; Andrew M. Montaño; Marvin, Bruce (ATG); Rick Till; Gary Kahn
Subject: Whistling Ridge Energy Project - Friends' Scoping Comments - Part 1

Attachments: Friends' Scoping Coments - Part 1.pdf

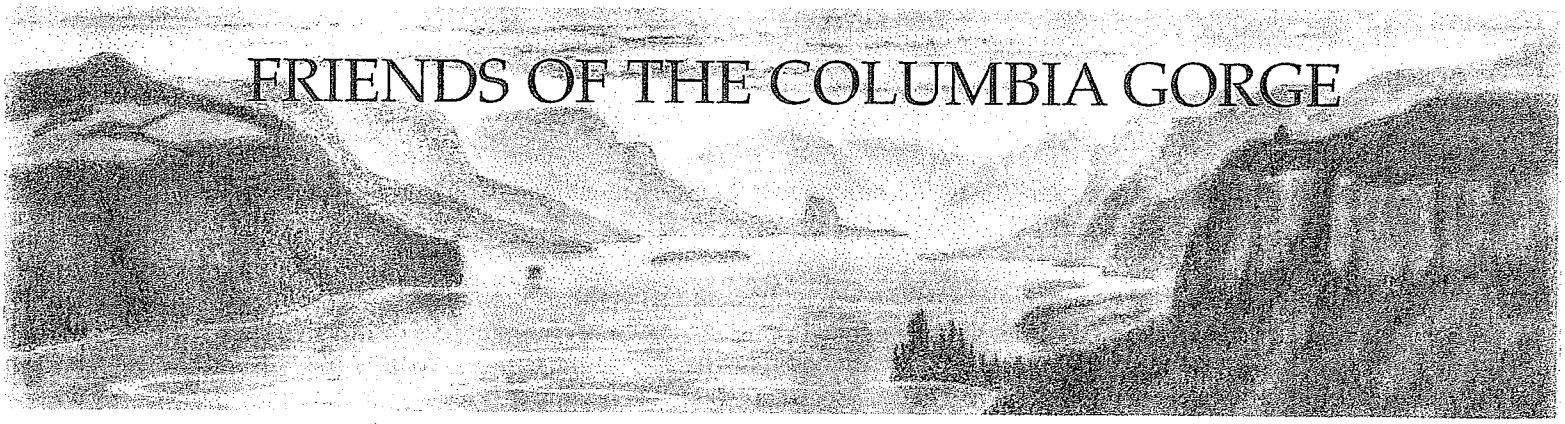
Friends' Scoping Coments - Par...

Dear Mr. Fiksdal:

Please find attached Part 1 of the scoping comments of Friends of the Columbia Gorge on the above-referenced proposal. Rick Till will e-mail Part 2 shortly. Paper copies of both parts will be sent in today's mail.

Thank you for your time and consideration. If you have any questions or comments, please do not hesitate to contact me.

Nathan Baker, Staff Attorney
Friends of the Columbia Gorge
nathan@gorgefriends.org
[redacted]
Portland, Oregon 97204-2100
(503) 241-[redacted]
Fax: (503) 241-[redacted]



VIA E-MAIL AND FIRST-CLASS MAIL

May 18, 2009

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum St. SE
Olympia, WA 98504-3172

Re: SEPA & NEPA Scoping for the Proposed Whistling Ridge Energy Project – Application No. 2009-01

Dear Mr. Fiksdal:

Friends of the Columbia Gorge has reviewed the above-referenced proposal and would like to provide the following scoping comments pursuant to SEPA and NEPA. Friends is a non-profit organization with approximately 5,000 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area.

1. The environmental impacts of the full project must be reviewed now.

EFSEC and the BPA are mandated to thoroughly review the environmental impacts of this project at the earliest possible stage, which is now. Lead agencies must prepare an environmental impact statement "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified." WAC 197-11-055(2). "The fact that proposals may require future agency approvals or environmental review shall not preclude current consideration, as long as proposed future activities are specific enough to allow some evaluation of their probable environmental impacts." *Id.* 197-11-055(2)(a)(*i*).

This matter involves a proposal by SDS Company to develop a large-scale industrial wind energy facility containing approximately 84 wind turbines. As depicted on a site map prepared by SDS, approximately 35 of the turbines would be located on DNR lands in Klickitat County, and approximately 49 turbines would be located on adjacent private lands in Skamania County. Ex. B. Although the applicant's map depicts 84 specific turbine locations, the applicant

also proposes to determine "final" locations for both the Skamania and Klickitat portions later. Ex. A; EFSEC Application at 2.1-1.

SDS applied for the Klickitat turbines first. On December 4, 2008 SDS filed an application with the DNR proposing "development . . . of approximately 35 turbine locations" on DNR land. Ex. A.

More than three months later, on March 10, 2009, SDS applied for the Skamania portion, by filing an application with EFSEC for "up to 50 wind turbines." EFSEC Application at 2.3-3.

The entire project, previously called the "Saddleback" wind project, is now called the "Whistling Ridge" project. The SDS-generated map shows that more than 40 of the turbines would be sited in a single, lengthy array along Whistling Ridge. Ex. B. (The EFSEC application refers to the Skamania portion of this array as the "B" array.) The map also shows that SDS proposes connecting the full project to the BPA electricity transmission grid. Ex. B.

As further evidence that SDS proposes a single project with 84 wind turbines in two counties, Friends submits the three enclosed newspaper articles. Exs. C, D, & E. All three articles refer to the 84-turbine proposal as a single project. SDS President Jason Spadaro was interviewed for all three articles. To our knowledge, SDS did not request any corrections to these articles or otherwise respond to them. In fact, SDS has placed one of these articles on its Whistling Ridge project web site. "SDS eyes expanded wind power project," available at http://whistlingridgeenergy.com/site/wp-content/uploads/2009/03/enterprise_021809.pdf (last visited May 16, 2009). In that article, Mr. Spadaro states that proposing all 84 turbines now "gives [SDS] more flexibility," which in turn allows the company to "optimize the site and minimize impacts." Ex. D at 2.

Despite this pronouncement, SDS's application to EFSEC never once mentions the 35 turbine sites proposed in Klickitat County, even though those turbines were applied for first. It appears that SDS is attempting to piecemeal the project and avoid full environmental review of the entire project now. This approach is unacceptable and in violation of SEPA.

The nature, scope, and potential environmental impacts of the Whistling Ridge project are sufficiently apparent to trigger preparation of an EIS for the entire 84-turbine wind project now. The EIS must evaluate the likely environmental effects of the full project, including development of the entire wind facility and the various alternatives that might address environmental concerns. Failure to do so violates SEPA's mandate to consider environmental impacts and alternatives at the earliest possible time.

As noted above, SEPA requires a comprehensive environmental review at the earliest possible stage. An environmental impact statement must "be prepared prior to the first government authorization of any part of a project or series of projects which, when considered cumulatively, constitute a major action 'significantly affecting the quality of the environment.'" *Juanita Bay Valley Community Ass'n v. City of Kirkland*, 9 Wn. App. 59, 72–73, 510 P.2d 1140 (1973) (quoting RCW 43.21C.030(2)(c)).

By failing to even mention the Klickitat portions of the project, the applicant is asking EFSEC to improperly segment the project into multiple pieces. SEPA prohibits a project from being artificially segmented into different components to avoid comprehensive environmental review. *See Merkel v. Port of Brownsville*, 8 Wn. App. 844, 850–51, 509 P. 2d 390, 395 (1973). All phases and portions of a project must be evaluated at the outset. *Id.*; *see also Indian Trail Property Owner's Ass'n v. City of Spokane*, 76 Wn. App. 430, 443, 886 P.2d 209 (Wn. App. 1994).

The applicant's apparent proposal to examine only the Skamania portion of the project would directly contradict one of the central purposes of SEPA, which is "to avoid the adverse impact upon the environment which takes place when various phases of a project, or a series of projects, are authorized by governmental agencies in a piecemeal fashion without regard to the cumulative impacts of the total development." *Juanita Bay*, 9 Wn. App. at 72 (citing *Merkel*; *Greene County Planning Bd. v. Fed. Power Comm'n*, 455 F.2d 412 (2d. Cir. 1972)). Dividing a project into segments for the purposes of SEPA review is prohibited because the piecemeal administrative approvals that result from such segmentation frustrates the vitality of SEPA. *Merkel*, 8 Wn. App. at 850–51.

In sum, the EIS must review the entire 84-turbine project—including all of its component parts and various alternatives to those parts. EFSEC cannot make an informed decision on this proposal until the full project and its impacts are reviewed.

2. The EIS must evaluate a range of alternatives sufficient to avoid resource impacts and conflicts with applicable laws.

The analysis of alternatives is considered the "heart" of an EIS. 40 C.F.R. § 1502.14. Here, the EIS must evaluate a range of alternatives sufficient to avoid resource impacts and conflicts with applicable laws.

The applicant has publicly stated that it has proposed all 84 turbines now in order to give it "more flexibility" in "optimiz[ing] the site and minimiz[ing] impacts." Ex. D at 2. In accordance with this statement and with SEPA, the alternatives analysis must evaluate the full 84-turbine project, as well as various alternatives to the project.

For example, the EIS should quantify how many of the 84 turbines are proposed within a designated Spotted Owl Special Emphasis Area ("SOSEA"), and should evaluate one or more alternatives that would remove these turbines from the SOSEA.

Similarly, the EIS should consider one or more alternatives that would move or eliminate all turbines visible from designated key viewing areas within the Columbia River Gorge National Scenic Area. Such an alternative was recommended by the National Scenic Area office of the Forest Service in its May 6, 2009 letter to EFSEC.

Finally, the EIS should consider one or more alternatives that would remove all portions of the project from the General Management Area of the National Scenic Area, where the project is prohibited by law. SCC § 22.10.020(A); 16 U.S.C. § 544d(d)(6).

3. A number of defects in the application must be cured.

In a number of respects, the application fails to provide information about the project sufficient to evaluate its environmental impacts.

For example, the application discusses two alternative road configurations within the National Scenic Area (Application at 2.19-3), but evaluates only one of them (Route 2) with any detail. The application also fails to explain whether either of these alternatives would require the condemnation of any private land along the roadways and intersections in order to provide sufficient width and turning radius for hauling the turbine components. The applicant's Pavement Engineering Report contains little to no information about the existing pavement and base thickness along the haul route, as well as the existing average daily traffic volumes along the haul route. The application fails to state an upper limit for vehicle weight, and merely states that many of the vehicles will exceed the WSDOT legal load limit of 52.75 tons. EFSEC Application at 4.3-37. Finally, the application also fails to provide sufficient data regarding the number of vehicular trips likely to result from the project, especially during the construction phase. All of this information must be made available prior to, and evaluated in, the EIS.

The application also proposes a new electrical substation and interconnection tower located immediately outside the boundary of the National Scenic Area, yet provides little to no detail about these components of the project, such as their proposed heights, footprints, exterior colors, and potential visibility from key viewing areas within the National Scenic Area.

The studies for vegetation and rare plants included in the application were conducted six years ago and are no longer valid. Moreover, these studies were apparently never finished. Appendix B-1 is expressly labeled as a "draft," and all of the figures are missing from both of these Appendices. The missing figures would have depicted, among other things, the geographic areas that were studied for occurrences of rare and sensitive plants. This is crucial information, given that the studies were apparently conducted for a previous project configuration that included DNR lands in Skamania County, and thus likely contained different lands than the current project. The applicant should be required to conduct current vegetation and rare plant studies specific to this project.

4. The proposal is likely to have significant adverse effects to air quality.

The applicant proposes to haul tens thousands of tons of construction materials and turbine components through the Columbia River Gorge National Scenic Area. The application contains little to no information about the number of vehicular trips likely to result from the project during the construction phase. The application does state that more than 500 heavy haul truck trips would be required "for the towers only," but does not clarify whether this figure includes the blades, and does not provide trip numbers for hauling construction materials and equipment, warning cars accompanying heavy haul trucks, and construction workers' vehicles. Nor does the application provide any data regarding the number and frequency of proposed barge trips, which appears to be the applicant's preferred method of transport to, and through a portion of, the National Scenic Area.

The EIS must review the air quality impacts of transporting and hauling turbine components and construction materials from the location(s) at which they would be constructed to the construction sites. This may include international trips if the turbines would be manufactured abroad. Under SEPA, the regional scope of environmental impacts is to be broad:

> In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries.

WAC 197-11-060(4)(b).

Without definitive numbers of barge, truck, and/or rail trips, it is impossible to conclude with any certainty the exact environmental impacts these trips would produce. However, given the scope of this project, it is likely that the air pollution created by this project would have a significant adverse impact on the environment.

The environmental analysis of the proposal must in particular focus on the air emissions of the tugboats used for hauling the barges. A 2008 joint study by the National Oceanic and Atmospheric Administration and the University of Colorado found tugboat emissions to be the worst among sea-faring vessels in terms of soot emissions. *See* NOAA, NOAA Takes First Broad Look at Soot from Ships, http://www.noaanews.noaa.gov/stories2008/20080709_soot.html (July 9, 2008) (hereinafter "2008 NOAA Study").

Soot, or black carbon, is an environmental hazard for at least two reasons. First, soot is particulate matter. The small particles in soot pose serious health risks because they "easily reach the deepest recesses of the lungs." EPA, Health and Environmental Effects of Particulate Matter: Fact Sheet, http://www.epa.gov/ttn/oarpg/naaqsfin/pmhealth.html (July 17, 1997). Tugboats have "a disproportionate impact on air quality because they travel within ports, emitting potentially harmful particles near populous urban areas." 2008 NOAA Study. Similarly, the continuous addition of tugboat soot along the Columbia River could prove very harmful to the many population centers along the River. The environmental analysis must consider the cumulative effects of the emissions from barge transport already occurring on the Columbia River, as well as the individual impacts from this proposal.

Second, soot is a major contributor to global warming. Although there is still some uncertainty, a recent New York Times article cites reports that black carbon is the number two contributor to global temperature rises, responsible for 18% of the planet's warming. Elizabeth Rosenthal, *Third-World Stove Soot is Target in Climate Fight*, N.Y. TIMES (Apr. 15, 2009), *available at* http://www.nytimes.com/2009/04/16/science/earth/16degrees.html. Recent professional conclusions suggest that a SEPA analysis must consider climate change effects. As the SEPA Working Group for the Climate Advisory Team recently noted in an outline of its goals: "While not completely certain, the Department of Ecology believes, and the co-chairs of this SEPA IWG concur, that SEPA already requires an assessment of a proposal's potential impact on climate change." SEPA Implementation Working Group, Scope of Work, Approach, and Schedule,

http://www.ecy.wa.gov/climatechange/2008CATdocs/IWG/sepa/052808_sepa_scope.pdf at 1. Because of the considerable impact that soot has on climate change, and the large scope of this project, a thorough analysis of these impacts must be conducted.

Without a thorough analysis of the types of transport methods to be used, the exact number of proposed trips, and the potential impacts of air emissions, this project should not go forward. Also, considering that all emissions from the project would be new emissions, alternatives must be considered that would reduce the impacts of emissions on the environment.

In particular, air quality within the Columbia River Gorge National Scenic Area is likely to be significantly adversely affected by this proposal. Air quality is already significantly deteriorated in the National Scenic Area, and even incremental increases in pollution are likely to significantly exacerbate existing trends.

Gorge air quality has been monitored for approximately twenty years. The U.S. Forest Service has documented that visibility impairment occurs more than 95% of the time. The Forest Service has also documented that terrestrial ecosystems are being affected by high concentrations of sulfur and nitrogen compounds and that acid deposition may be adversely affecting cultural resources in the Gorge.

A Forest Service fog water deposition study showed that high levels of acid rain are already occurring in the Columbia River Gorge. Fog and rain in the Gorge is 10 to 30 times more acidic than usual Northwest rainfall. The Gorge now stands among the most polluted places in the country, including Pittsburgh and Los Angeles. The study concluded that ecosystem harm is already occurring, the eastern Gorge is considerably more polluted than was predicted from lichen studies, and detrimental effects of acid deposition on archaeological resources is a significant concern.

The Forest Service has also performed water quality and lichen studies in the Gorge. The water quality study found relatively high concentrations of fluoride, ammonium, potassium, and sulfate at Warren Lake, adjacent to the Columbia Gorge at an elevation of 3732 feet. The lichen study had similar results. Based on these two studies, the Forest Service concluded that the Gorge has probably experienced episodic fluoride exposure, most likely in combination with gaseous sulfur dioxide. The study found that the sulfur and nitrogen are coming from a number of different emission sources and fluoride is most likely coming from aluminum smelters.

Another study by the Forest Service Air Quality Management Staff was based on pollution concentrations at air quality monitoring stations at Wishram and Mount Zion. The study determined that visibility impairment in these two locations is perceptible 95% of the time; obvious 42% and 64% of the time, respectively; and severe 15% and 14% of the time, respectively.

According to another Forest Service study, visibility impairment has continued to worsen since 2000. At the Wishram monitoring station, the number of days that visibility is moderately degraded increased from 42% to 57% between 2000 and 2005. The number of days that visibility impairment is perceptible increased to almost 100%.

The Forest Service studies demonstrate that air quality and visibility are already degraded in the Scenic Area to the point of adversely affecting scenic, natural, and potentially cultural and recreation resources. (If EFSEC or the applicant would like copies of any of these studies, Friends would be happy to provide them.) The applicant must analyze the impacts of further increases in air pollution in the National Scenic Area.

5. The proposal is likely to pose a significant fire risk.

The application provides insufficient information about the risk of fire and explosion, the environmental consequences that would flow from such an occurrence, and the applicant's plans to prevent and respond to such an occurrence. This is the first wind energy facility proposed on forested lands in the Pacific Northwest. Thus, the risk of catastrophic fire for this project is significantly greater than other regions where wind energy systems have been sited in the past. In addition, the proximity of the proposed wind facility to existing BPA lines increases the risk that a fire at the site would interfere with the transmission of electricity.

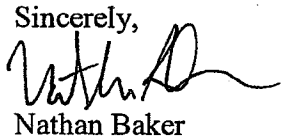
The application downplays the risk of fire, not acknowleding that wind energy fires are a very real occurrence. Attached as Exhibits F through H are three newspaper articles about three different wind energy fires over the past three years (two in Australia, one in Nebraska). These are only three of the many fires that have occurred in the recent past.

Also attached as Exhibit I is an October 9, 2008 letter from Skamania County Fire District No. 4 to the Skamania County Commissioners expressing concerns about allowing large-scale wind energy systems on forested lands in the County. Although the proposed facility is not located within the boundaries of Fire District No. 4, the same types of concerns identified in this letter would be presented at the project site.

6. Conclusion

Given the magnitude of the environmental impacts posed by this project, it is essential for EFSEC and the public to fully understand the harms that may result from the project and to have the ability to review possible alternatives that might reduce environmental impacts. Please continue to keep Friends of the Columbia Gorge notified in this matter, including notice of any opportunities to comment and notice of any governmental decisions and actions. Thank you for the opportunity to comment, which preserves our standing.

Sincerely,



Nathan Baker
Staff Attorney

cc: Andrew M. Montaño, BPA
Bruce Marvin, Counsel for the Environment

Submit in Duplicate

STATE OF WASHINGTON
DEPARTMENT OF NATURAL RESOURCES

APPLICATION TO LEASE STATE LAND FOR WIND POWER

NOTE TO APPLICANT: The Department of Natural Resources' consideration of the application includes a field inspection and an administrative review to determine the impact the request will have on the management of the lands involved and to determine if the request is in accordance with the statutes of the State of Washington.

To the Commissioner of Public Lands, Olympia, Washington 98504:

1. The undersigned, SDS Company, LLC, hereby apply to lease land at the following legal description Section 29, 30, 31, 32, Township 4N, Range 10, East in Skamania County, Washington.

   List any additional sections, or more specific legal description:

   Name of Proposed Wind Power Development: Saddleback Wind Project

2. Enclose a $25.00 application fee. Applications from public agencies do not require an application fee. All remittances are made to the Department of Natural Resources.

3. General description of the proposed development including number and general location of turbines and met towers (use separate sheet if necessary).
   This development is intended to be an expansion of a project to be built entirely on land controlled by SDS Lumber Company. The proposed development on the DNR land will consist of approximately 35 turbine locations (this is subject to change depending on the turbine model selected for the project) and two met towers. The met towers will be erected first and will be used to determine the final turbine placement and help select the turbine choice for the project. Attached is a drawing of the proposed project area.

   Are there trees to be removed in the lease area? X Yes ☐ No

   Trees that are to be removed must be physically marked or otherwise identified on the ground.

4. Access Road:
   Use existing road? X Yes ☐ No

   Construct new road? X Yes ☐ No Attach map Shown on attached page

   The width of the proposed road will be 45 feet during construction and reduced to 20 feet after construction.
   The centerline of the proposed road must be physically marked on the ground.

   Are there trees in the new access road? X Yes ☐ No

5. Do you have any other leases with the Department of Natural Resources? ☐ Yes X No
   If Yes, please list project name & lease number?

6. This lease is requested for 30 years. (30 years is standard)

   Dated at Bingen, Washington, this 4 day of December, 2008

FOR DEPARTMENT USE
Amount received: $
Refer to Application No.

Signature
Print Name SDS LBR Co Jason Spaparo
Address PO Box 266
Bingen, WA 98605
Phone No. 509 493-2155
UBI No.

EXHIBIT A
PAGE 1 OF 1

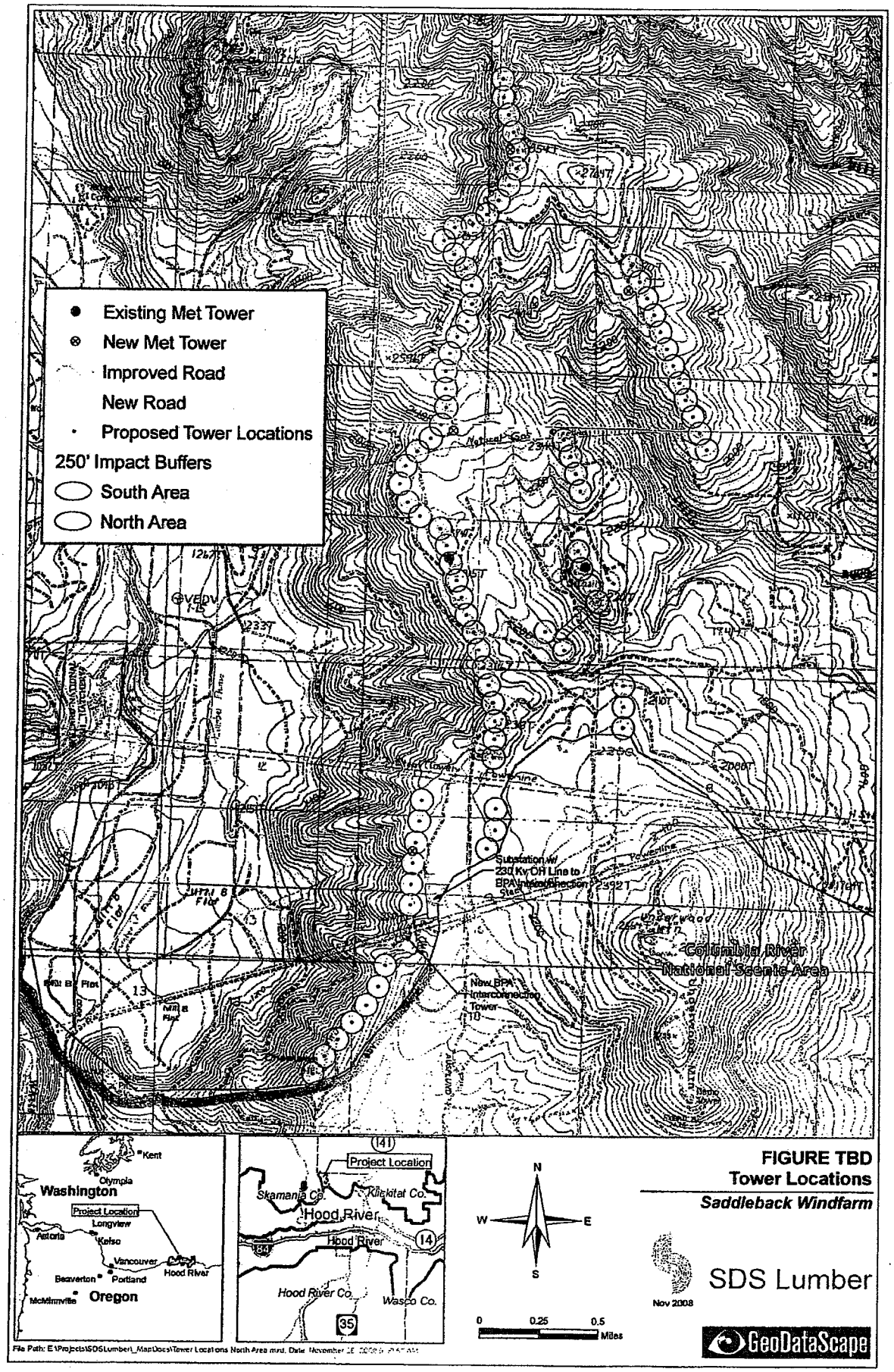


FIGURE TBD
Tower Locations
Saddleback Windfarm

SDS Lumber

Nov 2008

GeoDataScape

File Path: E:\Projects\SDSLumber_MapDocs\Tower Locations North Area.mxd, Date: November 2[illegible]

EXHIBIT B
PAGE 1 OF 1

http://www.columbian.com/article/20090205/NEWS02/702059937

16 bills seek to amend alternative-energy initiative approved by voters

Wednesday, February 4, 2009
BY KATHIE DURBIN
COLUMBIAN STAFF WRITER

Renewable energy has muscled its way onto the 2009 Legislature's agenda.

As of Wednesday, lawmakers had introduced 16 bills to amend Initiative 937, the voter-approved 2006 measure that requires utilities to ramp up their purchase of solar, wind and geothermal energy beginning in 2012.

The reason for the intense interest: This is the first session since its passage that the law can be amended by a simple majority vote.

Under the Energy Independence Act, every Washington electric utility serving at least 25,000 customers must use renewable energy to meet at least 3 percent of its energy load by 2012, at least 9 percent by 2016, and at least 15 percent by 2020.

The law defines "eligible renewable resources" as wind, solar, geothermal, landfill and sewage gases, wave and tidal power, and certain kinds of biomass and biodiesel fuels. The law also requires utilities to meet specific energy conservation targets beginning in 2010.

Clark Public Utilities weighed in at a Senate committee hearing Wednesday in favor of language in a bill sponsored by Sen. Chris Marr, D-Spokane. Senate Bill 5840 would allow utilities to count conservation efforts toward meeting their renewable energy targets before they are forced to turn to the purchase of renewable energy or energy credits. A House bill introduced by Rep. Jaime Herrera, R-Ridgefield, would accomplish the same thing.

"We are advocating that we should first use conservation and then go to additional generation," utility spokesman Dean Sutherland said. As it is now written, he said, "The initiative pushes you toward generation."

The change could save Clark ratepayers $59 million by 2028, Sutherland said.

The utility also favors a change in the Senate bill that would permit utilities to buy renewable power from throughout the Western United States and Canada, instead of limiting their purchases to the Pacific Northwest.

That would make it possible to buy reliable solar energy from California and to purchase abundant wind energy from Montana in the winter, when it's scarce in the Northwest, Sutherland said.

Those changes are modest compared to others.

Some bills would let utilities count hydroelectric power and the burning of construction debris, food waste and wood waste products toward meeting their goals.

Some would push back the retroactive date for counting renewable energy purchases from 1999 to 1995.

A bill introduced by Sen. Jim Honeyford, R-Sunnyside, and co-sponsored by six other Republicans, would count all hydroelectric generation in the Pacific Northwest as a renewable energy resource that utilities could count toward meeting their goal.

EXHIBIT C
PAGE 1 OF 2

On average, hydro makes up 50 percent of the Northwest's energy generating capacity.

"The cumulative effect of all the weakening amendments would be that the 2020 standard has already been met and thus nothing needs to be done," said Marc Krasnowsky, communications director for the Northwest Energy Coalition.

"We're talking about building our energy future," Krasnowsky said. "Making the hydro system more efficient is great, but we need to diversify and we need to build a market for new renewables. Hydro isn't going to get us there. The choice is between new non-hydro renewables and fossil fuels."

Initiative 937 is the cornerstone of the state's strategy to reduce greenhouse gas emissions, yet Oregon, California and Idaho all have adopted stricter renewable energy targets than Washington in the past three years, Krasnowsky said.

The renewable energy law has been a boon to the Port of Vancouver, one of the top importers of wind turbines on the West Coast. In a business roundtable with Gov. Chris Gregoire last week, Roby Roberts of Vesta America Wind Technology, which manufactures giant wind turbines, urged the governor to protect the law.

"We're in 63 countries, and this is one of the best ports in the world for us," Roberts said. "One of the things to keep the momentum going is to make sure I-937 is not changed."

The port is scheduled to announce a new cargo-handling agreement today.

In the Columbia River Gorge, SDS Lumber Co. President Jason Spadaro is counting on the law to create a strong demand for wind energy as he moves forward with proposal to develop a wind farm on the company's property and adjacent state trust land.

Kathie Durbin: 360-735-4523 or kathie.durbin@columbian.com.

EXHIBIT C
PAGE 2 OF 2

The Enterprise

SDS eyes expanded wind power project

30 additional turbines possible on DNR land

By Jesse Burkhardt
February 19, 2009

Although its original proposal to site 42 wind power turbines in eastern Skamania County remains on hold pending the outcome of an appeal, SDS Lumber Co. is considering expanding the scope of its renewable energy project.

SDS President Jason Spadaro said SDS may want to add more wind turbines on Whistling Ridge, north of the original proposal's boundaries. The expansion would be onto Washington Department of Natural Resources (DNR) property and within Klickitat County.

"We could site 30 additional turbines on DNR land if studies prove it's viable," Spadaro said.

Spadaro said no decisions have been made, and there has been no official filing.

"All we've done is apply for the right to study the property," Spadaro explained. "It is potentially a `phase two' for wind power development, but we still have to do wildlife studies, a wind study, review the topography, and then apply to lease DNR property. We still would need a DNR review, environmental review, the EIS, public meetings -- the entire public process."

DNR is now determining whether to allow SDS to study the site for possible wind power development. A DNR comment period regarding the idea closed on Feb. 10, but Spadaro said he had no idea how long the DNR decision process would take.

"DNR is considering leasing four Common School Trust parcels totaling approximately 2,560 acres for wind power development in western Klickitat County," read an excerpt from a Jan. 12 DNR document regarding the inquiry from SDS. "It is possible that these parcels may be incorporated into a larger surrounding wind power project."

"We just want to study it, and it's smart for DNR to allow it," Spadaro said. "This would diversify the revenue source for schools, diversify the tax base, and diversify energy sources."

EXHIBIT P
PAGE 1 OF 3

According to Spadaro, the Whistling Ridge site is ideal for wind power development. He explained that Underwood Mountain works like a "wind dam," with the wind flowing like water around Underwood Mountain.

"It creates a funnel where the wind flows. that's why the site is so windy," Spadaro said. "The other reason why the site works so well is because there is a regional BPA transmission system coming through the area. We can connect right onto it."

Spadaro added that a larger project makes it more viable economically.

"It also gives us more flexibility. If we have more flexibility, we can use that to optimize the site and minimize impacts," Spadaro said.

Some residents have been outspoken in opposition to the siting of wind power turbines in the area. One of those alarmed about the possibility is Ruth Dye of Underwood.

"This severely impacts my life, as I live just south of where this project is planned," said Dye.

Dye pointed out that there could be serious restrictions on public access if the DNR allows wind power development in the area.

"If this project goes forward, we will be locked out of access to this public land," Dye said. "If you hunt, fish, ride a mountain bike, ride a horse, or just enjoy a walk in the woods, sorry, but you will not be allowed to use this area any more."

Dye also expressed concern about impacts on water quality.

"There are three streams in the proposed wind farm area," Dye explained. "These feed the White Salmon, Little White Salmon, and eventually the Columbia River. This watershed will be disturbed. Chemicals to control noxious weeds may be used. If you kayak, windsurf, kiteboard, fish, swim, or use downstream water, you might want to think about the impact of this wind farm on you."

According to Dye, the area in question also has been designated by DNR as a "Northern Spotted Owl Conservation Area," and pointed out that the proposed wind farm could harm owl habitat and other wildlife as well.

"The area has been determined to be a conservation area for the spotted owl, but how will they make good on the losses to the owl or the other species in this area?" Dye questioned.

Spadaro said he thought it was unfortunate that even at this informational-gathering stage, opponents have been attacking the concept.

EXHIBIT 12
PAGE 2 OF 3

"There are certain people on almost every project who say they are for renewable, green power, but then come out and say, `I like it, except anywhere near me,'" Spadaro said.

Spadaro debunked claims that the wind turbines would be within the White Salmon watershed.

"It's not even close to Buck Creek," he said.

The move to develop energy sources is part of a long-range strategy by SDS as it moves to diversify beyond being primarily a wood products company.

"This is another revenue source," Spadaro said. "No one knows when the demand for housing will improve, but there is always growing demand for energy. This helps us diversify."

Spadaro pointed out that the state of Washington has mandated that at least 15 percent of the energy used in the state must come from renewable sources by 2020.

"If we're going to meet renewable energy requirements, that energy is not all going to come from eastern Washington," Spadaro commented. "And the federal economic stimulus plan is based in large part on developing new renewable energy sources. That's a big deal. That demand has to be met somewhere."

Spadaro also sounded a geo-political warning about the consequences of failure to develop innovative sources of energy.

"We can either participate in it," he said, "or forget about clean energy and about independence from foreign oil."

D

EXHIBIT_____
PAGE 3 OF 3

Wind farm

Wind farm project may expand

Company wants to lease state trust land in the Columbia River Gorge

By Kathie Durbin
Columbian staff writer

A Bingen-based company that hopes to build a 70-megawatt wind farm on a backcountry ridge near Underwood has asked the state to explore the expansion of the project north onto 2,560 acres of state trust land.

The Saddleback Wind Project would rise on logged-over industrial lands behind Underwood Mountain, just outside the north boundary of the Columbia River Gorge National Scenic Area.

The original proposal by SDS Lumber Co. called for installing 42 wind turbines along a roughly north-south alignment on its land in eastern Skamania County to harness the gusts that blow through the Columbia River Gorge.

That proposal is on hold pending appeal of a zoning ordinance that would set standards for wind projects in all of Skamania County.

Last spring, the company approached the Washington Department of Natural Resources about leasing state trust land to the north so it could build a larger and more profitable project.

The DNR land the company wants to lease is in western Klickitat County, which already has a zoning ordinance that fast-tracks siting of wind farms and other energy projects.

SDS Lumber President Jason Spadaro said it just makes sense to expand north if the wind generation potential is there.

"The project that we have now is on the small end of wind projects," he said. "Because of that, I don't have a lot of flexibility. I need to maintain every potential turbine in order to keep the size of the project where it works. The more megawatts you put through, the more viable the project is."

Under the proposed expansion, SDS would pay to build roads, collectors and other infrastructure necessary to provide access to the remote site and feed power generated by the wind turbines into the electrical grid.

"We would extend the road system we are already going to build," Spadaro said. "There is a tremendous amount of synergy between the two properties."

DNR officials said they would enter into a lease arrangement only if it yields revenue for the common school fund.

"Otherwise we wouldn't do it," said DNR regional manager Bill Boyum. "It has to be a good investment on the part of the state."

The DNR has approved other leases for wind projects east of the Cascades, such as the Wildhorse Project east of Ellensburg, where 34 wind towers generate power on state trust land. "We turned $500,000 last year" from that project, Boyum said. "That all goes into the common school fund."

The DNR has received about 20 comments on an environmental assessment of the proposed lease. The deadline for comments to the agency's Ellensburg office is Feb. 10.

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PAGE 1 OF 2

Boyum said if the state does eventually agree to lease the land for wind turbines, that phase of the project would be subject to a full environmental review by Klickitat County.

But critics say the DNR is trying to fast-track the project by adopting a "piecemeal" environmental review process instead of assessing the impact of the entire project upfront. A full assessment is needed, they say, to assure that environmental concerns are known and incorporated into the layout, construction and operation of the project.

"The state is forfeiting its right and its authority to enforce state regulations by punting environmental review to Klickitat County," said Michael Lang, conservation director at Friends of the Columbia Gorge. The organization has taken no official position on the Saddleback project, but is appealing Skamania County's energy facility zoning ordinance.

Owl habitat

One potential sticking point is that the state trust land lies in an area of scattered old growth and second growth forest used by the threatened northern spotted owl. The DNR is required to manage the area as a "spotted owl emphasis area" under its federally approved habitat conservation plan.

The DNR would require SDS to consult with federal and state wildlife officials before installing wind-monitoring towers to determine whether they could harm birds or wildlife. It would require a sign-off from the U.S. Fish and Wildlife Service that the project does not have a negative impact on owls or other imperiled species.

Spadaro said it remains to be seen whether the state trust land will prove to be a viable source of wind power. "We may start reviewing this and find out that there are wildlife issues or other issues that make it impossible to go ahead."

However, if everything goes smoothly, as many as 25 or 30 giant wind turbines could be built on DNR land, he said.

With a new administration in Washington, D.C., promoting green energy, and new state renewable energy requirements looming, the time is right to move ahead on viable wind energy projects, Spadaro said.

A voter-approved federal initiative requires electric utilities to get 15 percent of their energy from renewable sources by 2020. Oregon and Washington have adopted even more ambitious goals.

"President Obama has spoken about his intent to increase renewable energy," Spadaro said. "There are now discussions about a national renewable energy standard as well. The demand is there. So is the ability to finance and develop the project. There are bank issues that make it more of a challenge, but that is not a long-term issue."

Comments on the DNR's environmental assessment of the proposed land lease should be submitted by Feb. 10 via e-mail to sepacenter@dnr.wa.gov, or by mail to P.O. Box 47015, Olympia, WA, 98504-7015.

Kathie Durbin: 360-735-4523 or kathie.durbin@columbian.com.

EXHIBIT E
PAGE 2 OF 2

http://www.theadvertiser.news.com.au/common/story_page/0,5936,18116441%5E2682,00.html

Wind farm fire caused blackout

A $3 MILLION wind farm turbine caught fire while dozens shut down at the time South Australia most needed them - when a heatwave left 63,000 South Australian homes without power last month.

February 6, 2006 in Sunday Mail

Adding to the drama, firefighters could not extinguish the blaze because the tower was too high at 67m.

Lack of wind and automatic shutdowns triggered by hot temperatures were to blame for the state's 180 turbines producing just 10 per cent of their maximum power capacity during the January heat wave, according to experts.

The experience proved SA could not rely on wind power to provide electricity when demand was greatest, the Electricity Supply Industry Planning Council (ESIPC) said.

"You never know if the wind will be blowing when you need it to or if wind turbines will shut down," ESIPC spokesman Brad Cowain said.

Operators of the Lake Bonney wind farm, where the turbine fire occurred on Sunday, January 22, said all of its 46 turbines had automatically shut down during the heat wave when temperatures exceeded 40C.

"We want the turbines to operate during peak demand to capture revenue but power output is limited by the automatic shut down to protect electrical instruments," wind farm operator Miles George of Babcock and Brown Wind Partners said.

He said the turbine fire – the first in Australia – had been caused by an electrical fault while maintenance crews were working on it after it had shut down.

Around 3pm, 40 CFS firefighters and six trucks rushed to the wind farm to extinguish the blaze but fire hose water couldn't reach the steel generator at the top of the tower.

Instead, the firefighters watched as fire destroyed the $3 million turbine – which weighs 75 tonnes – and extinguished spot fires ignited by ashes from the turbine blaze.

According to ESIPC, many of the European manufactured turbines used in SA shut down during extreme temperatures to avoid generator meltdown.

"Most turbines are manufactured in Europe where they don't have to worry about operating at high temperatures," Mr Cowain said.

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PAGE 1 OF 2

"We are investigating which individual turbines were not operating because of a shut down or lack of wind."

Between Thursday, January 19 and Sunday, January 22, maximum temperatures exceeded 40C throughout most of the state, creating record demands for electricity while wind farm output averaged only 10 per cent.

But during Saturday's peak power demand wind farm output plummeted to just 2 per cent of capacity, producing enough power for only 3500 homes, according to ESIPC. This compared with the maximum capacity of 318MW to power 175,000 homes. SA leads the nation in wind farm energy with five established sites – Starfish Hill, Canunda, Wattle Point, Cathedral Rocks and Lake Bonney.

There are numerous other approved wind farm developments including an AGL plan for 43 turbines at Hallet in the state's Mid North.

But AGL also plans to more than double the capacity of its nearby gas-fired plant, from 180MW to 430MW, at a cost of more than $100 million to ensure peak demand during hot weather can be met.

The state's independent energy regulator Pat Walsh declined to comment about the wind farm performance during the heat wave or its implications on the state's overall energy supply.

http://www.ktiv.com/Global/story.asp?S=9605354

Investigation: 'Foreign object' caused wind farm fire

January 1, 2009

By Matt Breen
KTIV NewsChannel 4

An investigation suggests an explosion and fire inside a Nebraska wind turbine– that's part of the largest wind farm in the state– was caused by a "foreign object".

A spokesperson for the company building the 80 megawatt Elkhorn Ridge farm, near Bloomfield, says the "object" blew into the turbine causing the blast. The incident injured three workers, including one who suffered first and second-degree burns from the waist up.

An investigation continues. But, company officials say the wind farm will begin generating power in the first quarter of 2009.

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http://portlincoln.yourguide.com.au/news/local/news/general/wind-turbine-burnt-out/1425564.aspx

Wind turbine burnt out

February 5, 2009

Natasha Ewendt
Port Lincoln Times

A wind farm turbine caught fire at the Cathedral Rocks Wind Farm in the early hours of Tuesday morning.

A fishing boat reported the fire at about 1am, and about 23 MFS and CFS firefighters extinguished the blaze before it spread.

Port Lincoln CFS regional commander Kevin May said on the crews' arrival the turbine housing at the top of the tower was on fire, with some embers falling to the ground.

He said the weather was on the firefighters' side and helped in preventing the fire spreading to nearby vegetation.

The turbine housing was completely destroyed, but the rest of the turbine could be salvageable.

The company said yesterday it expects the damage bill to be about $2 million, but it would determine an exact amount when it finishes its investigation.

EXHIBIT H
PAGE 1 OF 1

SKAMANIA COUNTY FIRE DISTRICT NO. 4

10042 WASHOUGAL RIVER ROAD PO BOX 249 WASHOUGAL, WASHINGTON 98671
PHONE (360) 837-3420 FAX (360) 837-3167

Skamania County Commissioners
P.O. Box 790
Stevenson, WA 98648

October 9, 2008

RE: Skamania County Code Title 21 Zoning

The Board of Skamania County Fire District No. 4, as well as the Fire Chief, continues to have concerns relating to some of the "Conditional Uses" in the Planning Commission recommended Title 21 zoning draft. The Planning Commission has appropriately removed the "Community Commercial Zoning" and "Camping Cabins" in the West End.

However, the allowance of large-scale wind generating and bio-energy facilities in the West End of the county is of great concern, given our extreme hazard risk assessment for potentiality of catastrophic wildfire. Further, multiple Nacelle fires have occurred in industrial wind turbine equipment. These facilities also require substations and transmission lines. In the event of a facility or substation fire, the ability of Fire District 4 (an all volunteer department) in providing standard fire and emergency medical calls would be overwhelmed.

During strong east winds, power lines are often either struck or break, leading to fires on the ground and in the trees. Again, if a higher voltage line were to come down on a hot summer day with strong east winds, or a Nacelle fire erupted in a wind turbine, a devastating fire could easily move beyond control due to the limited water supply and response capacity of the fire district. This could lead to a massive urban interface fire that could destroy many homes, burn many acres of land and lead to serious injury or death to those who could not retreat quickly enough from such a fire.

We the Board and the Fire Chief, insist that you consider the response capabilities of the emergency services available for the West End, before adopting zoning which would permit large scale wind energy and bio-energy facilities in this area of established high risk. If you proceed with zoning for these proposed facilities, we feel you will surpass the ability of local emergency services, placing the residents of the West End in peril. We believe it is imperative that these issues be addressed.

Respectfully,

Tim Young, Chair, Board of Commissioners

Dennis Gogolski, Commissioner

Keith Brown, Commissioner

Donald Ochs, Chief

EXHIBIT I
PAGE 1 OF 1

Scoping Comment #365

Bhavnani, Monica (CTED)

From: Patricia Meeks [redacted]@msn.com]
Sent: Monday, May 18, 2009 4:12 PM
To: CTED EFSEC
Subject: RE: Whistling Ridge Wind Turbines

Allen Fiksdal
Manager, Energy Facility Site Evaluation Council PO Box 43172
905 Plum Street SE
Olympia , 98504-3172

Dear Mr. Fiksdal, ,

Thank you for the opportunity to comment on this proposal.

I am opposed to the Whistling Ridge Wind Turbine development for the following reasons:

I do not believe it will be possible to reintroduce the condors to the Gorge as is now planned. This reintroduction will bring considerable amounts of money generated by bird watching and other environmental tourism groups.

It will negate any attempt to move forward with a dark skies initiative in the Columbia Gorge Scenic Area because of the required FAA lighting rules. The lights are intense enough to pollute the sky in many areas of Klickitat and Skamania Counties greatly reducing the ability of amateur astronomers to view the skies.

Constant pulsating lights will, without a doubt, cause a loss of revenue to small businesses that depend on tourism for their survival. Spending a night in a bed and breakfast with pulsating high-intensity red lights dancing on the walls is not what tourists visiting the gorge expect. These lights will also be visible throughout Skamania and Klickitat Counties, affecting camping and other outdoor recreation.

Noise levels from wind turbines create enough vibration and noise to have a profound affect on wildlife. If required, I can provide countless studies on how noise and vibration affect animals by interfering with species communication and by blocking signals that interfere with a species ability to escape from their natural predators.

Best regards,

Patricia Meeks
[redacted]
White Salmon, WA 98672

509-493-[redacted]

Scoping Comment #366

Bhavnani, Monica (CTED)

From: Paul Smith [redacted]@pacifier.com]
Sent: Monday, May 18, 2009 4:23 PM
To: CTED EFSEC
Subject: Attention Allen J. Fiskal, EFSEC Manager and council - comments on the proposed Whistling Ridge Wind Project

Follow Up Flag: Follow up
Flag Status: Completed

Attachments: Whistling Ridge Concerns.doc

Whistling Ridge Concerns.doc (...

Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172

Thank you council for the opportunity to voice my concerns about the proposed Whistling Ridge Wind project.

Whistling Ridge Wind Concerns:

1) This is a large scale wind turbine project located within Washington State-designated Spotted Owl Special Emphasis Areas sandwiched between the National Scenic Area (NSA) and National Forest land. Given this designation, coupled with the NSA and NF being conduits for wildlife corridors, a thorough EIS is warranted.
2) There needs to be a low frequency noise (LFN) analysis done. This project will probably be evaluated using Washington State noise standards which only measures in dBA (audible by humans) but there needs to be analysis done measuring, at minimum, either the presence or absence of LFN which would be measured using a C-weighted scale dBC (not audible to humans but can still have deleterious affects).
3) A 0.5 mile setback is inadequate when considering the topography of the Columbia River Gorge where the drainages, canyons and mountains can amplify and transmit sound from wind turbines greater distances than in typically used flatter landscapes. For instance, many European nations having over 20 years of experience with industrial wind facilities, have implemented regulations having setbacks of 1-1.5 miles. The location of the actual residence (home) on adjacent or nearby properties to wind turbines must be taken into account.
4) According to Travis Nelson, Wind and Water Energy Section Manager for WDF/W, "This project is the first of its kind in *forested* habitats in Washington State". The Columbia River Gorge provides habitat for more than 300 bird species and is a major stop-over for many migratory bird species. Industrial wind turbines can lead to loss of habitat, fragmentation of habitat and increased fatalities due to contact with wind turbines. Several Washington State listed bird species could be affected: the Spotted Owl (listed as endangered in Washington State), northern goshawk and piliated woodpecker (both listed candidate species) and the bald eagle (Washington State sensitive species) as well as numerous migratory birds, bats, gray squirrel (State threatened species) and many mammals.
5) The EFSEC does the environmental impact statement—why is this not required by the applicant of the project like most environmental impact statements? This is a private development that Washington State taxpayers, which I am one of, should

not have to pay for. SDS's application to EFSEC runs over 900 pages---how much is that going to cost me?

6) The Whistling Ridge southern boundary abuts the Columbia River Gorge National Scenic Area. The wind turbines will be over 420 feet high, which is nearly the same height as a 42-story building. These would be visible from several key-viewing areas throughout the Gorge to include I-84, Hood River, Husum, White Salmon not to mention many trails throughout the Gorge.
7) The SDS application states the Whistling Ridge site is managed for timber harvest. Wind turbines need to be sited as far away from buildings or trees as possible, which can block the wind and cause turbulence. How much timber production will now be taken out of production due to the wind turbines? How much state revenue for schools will be lost on the DNR section in Klickitat County? Will SDS make up for that?
8) Part of the project is within the boundary of the National Scenic Area (NSA). In order for this project to happen, the applicant would have to expand and improve over 2 miles of roads which are within the NSA. According to the National Scenic Area Act, it is prohibited to use scenic area lands for industrial purposes.

Thank you for your time,

Paul Smith
[redacted]
Washougal, WA 98671

Scoping Comment #367

Bhavnani, Monica (CTED)

From: Shawn Cantrell [redacted]@seattleaudubon.org]
Sent: Monday, May 18, 2009 4:26 PM
To: CTED EFSEC
Subject: Seattle Audubon scoping comments on Application No. 2009-01
Attachments: SAS Scoping Comments #2009-01.pdf

See attached.

If you experience problems opening the attachment, please contact me.

Thank you for your consideration.

Shawn Cantrell
Executive Director
Seattle Audubon Society
206-523-[redacted]
[redacted]@seattleaudubon.org

Seattle Audubon Society
for birds and nature

Allen J. Fiksdal, EFSEC
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, Washington 98504-3172

RE: Whistling Ridge Energy Project – Application No. 2009-01

Dear Mr. Fiksdal:

On behalf of the more than 5,000 members of Seattle Audubon, we are submitting these comments in response to the April 21, 2009 Scoping Notice. The mission of Seattle Audubon is to cultivate and lead a community that values and protects birds and the natural environment. Since 1916, Seattle Audubon has worked to protect birds of our region whose habitats are at risk.

Seattle Audubon supports development of well-designed, appropriately-sited renewable energy projects in Washington state. We were active participants in the development of the Washington Department of Fish and Wildlife's "2009 Wind Power Guidelines" recently completed.

As one of the first wind power projects to be considered for a forested landscape in Washington state, this environmental review will need to include a more detailed analysis of several issues that make this proposal different from other wind power projects located on agricultural and/or shrub steppe habitat; experience and knowledge gained from existing projects in the state may not be "transferable" to a project such as this being proposed for a very different environment.

As EFSEC conducts the environmental review of this proposed project, Seattle Audubon requests that you devote specific attention to the following issues detailed below.

I. Northern Spotted Owls (NSO) – While the application provides information on background status and recent project site survey data on this federally listed threatened species, much more detailed analysis needs to be conducted. The summary statement on page 3.4-29 in the application *"No impacts to northern spotted owls are expected"* should have much greater documentation in order to support such a claim. Specific concerns we have include:

A) We could not locate any mention or evaluation in the application of the proximity of the project to the state designated Columbia Gorge Spotted Owl Special Emphasis Area (SOSEA) and the federally delineated Conservation Support Area (CSA). SOSEAs are intended to provide a greater level of protect of potential habitat for Northern Spotted Owls, and CSAs identify areas that can provide important contributions to owl recovery. As such, the environmental review of this project should include a detailed evaluation of the potential impacts of this project on current and future owl habitat in areas designated by the state and federal government for private forest lands to provide support for owl conservation and recovery.

B) While the application does detail the NSO surveys conducted in the project area, there is no discussion or evaluation of the limitations of the current survey protocol for detecting NSO and the pending changes to those survey protocols by the US Fish and Wildlife Service (USFWS). Given the noted presence of Barred Owls in the project site, the adequacy of the survey data to support the assertion that no NSO are present is questionable. Additional surveys with revised protocols should be considered.

8050 35th Avenue NE • Seattle WA 98115
206.523.4483 • fax: 206.528.7779 • www.seattleaudubon.org

C) Even if NSO are determined to be absent from the project area, the environmental review should evaluate the potential for NSO to utilize the area in the future. As one of the guiding principles in the 2009 Wind Power Guidelines states *"From a wildlife conservation perspective, a species in decline may be absent from an area ... yet the habitat remains important for the conservation or recovery of that species."* (page 8) The EIS should include information on "site fidelity" of NSO and occurrence of NSO re-occupying a site center even after several years of absence.

D) While the application states that *"limited suitable habitat exists"* for NSO in the proposed project site (page 3.4-29), it does not quantify the amount. In addition, the application does not discuss the potential for existing "degraded" habitat to develop into suitable habitat during the projected 30 year life span of the project. A more detailed inventory of the existing habitat conditions would provide a better understanding of potential for suitable owl habitat, including information on stand age, tree species diversity, snags per acre, etc. The EIS should also evaluate the impact of the proposed project on dispersal habitat for NSO from nearby federal lands that can provide nesting, roosting, and foraging habitat for NSO.

II. Other Avian Species – The application includes useful information regarding avian surveys conducted at the project site in Fall 2004 and Spring 2006. The surveys were limited, however, in their scope and duration. As a result, they may not adequately capture the number of species that utilize the site nor the abundance of any given species. Much more robust surveys, conducted in every season and in multiple years would provide much greater degree of confidence regarding the likely avian species use of the project site. The fact that this proposed project is among the first forested sites in Washington to undergo environmental review, it is particularly important that adequate surveys be conducted.

In addition, the application includes unsubstantiated comments regarding bird mortality, such as *"Vaux's swifts, western bluebirds, and olive-sided flycatchers were commonly observed flying at rotor-swept heights and some turbine-related mortality may occur for these species over the life of the project. These collisions would **likely be rare**, and it is **unlikely** that the Whistling Ridge Energy Project would have any negative impacts on population levels on and near the project site."* (page 3.4-30, emphasis added) The EIS should more fully investigate this issue and document the facts underlying these type of statements.

III. Monitoring and Mitigation –Seattle Audubon appreciates the applicant's intention to convene a Technical Advisory Committee (TAC) to establish and coordinate appropriate mitigation and monitoring. Unfortunately the application contains very little information on the type and scope of the ongoing monitoring and mitigation measures the applicant would provide if the project were to be approved. A detailed mitigation and monitoring program should be developed ***prior to*** project approval, not left to be determined after the fact. We also believe that in addition to the government agencies to be included TAC, opportunities for public involvement in the TAC is also essential.

We appreciate the opportunity to comment on the scoping for this proposed project and look forward providing additional comment as the environmental review process moves forward. If you have any questions regarding Seattle Audubon's comments or would like additional information, feel free to contact me by telephone at 206/523-8243 ext. 15 or by email at shawnc@seattleaudubon.org.

Thank you for your consideration.

Sincerely,

Shawn Cantrell

Shawn Cantrell
Executive Director

Scoping Comment
#368

Bhavnani, Monica (CTED)

From: Betsy Frazier [redacted]@gorge.net]
Sent: Monday, May 18, 2009 4:45 PM
To: CTED EFSEC
Subject: Wind turbines in the Gorge Scenic Area

Hello,

"NO" on the wind turbines that are being considered 60 feet outside the beautiful Mid Columbia Gorge National Scenic Area boundary on Whistling Ridge. That is what it is – a National Scenic Area. It is defeating the purpose of the Scenic Area – no outside lights, no outstanding visual markings, and defeats the quality of life with noise.

Sincerely,

Betsy Frazier
Frazier Business Services
Hood River, OR 97031
541-490-[redacted]
www.frazierbusiness.com
Web Design and Maintenance

Scoping Comment #369

Bhavnani, Monica (CTED)

From: Dawn Stover [redacted]@hughes.net]
Sent: Monday, May 18, 2009 4:50 PM
To: CTED EFSEC; ammontano@bpa.gov
Subject: scoping comments on Whistling Ridge
Attachments: EFSEC_BPAscoping.doc; ATT3045655.htm

Please find my comments attached.

May 17, 2009

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172

Andrew M. Montaño
Environmental Project Manager
BPA Public Relations
DKC-7
P.O. Box 14428
Portland, OR 97293-4428

Re: Whistling Ridge Energy Project (Application No. 2009-01, KEC-4)

Dear Mr. Fiksdal, Mr. Montaño and other Responsible Officials at EFSEC and BPA:

I am writing to provide comments about the scope of the Environmental Impact Statement for the Whistling Ridge Energy Project, proposed by SDS Lumber Company d.b.a. Whistling Ridge Energy LLC. Please include my comments in the public record, and include my name on the mailing list for all future notices and decisions.

I am a resident of Klickitat County, an amateur naturalist, and a frequent visitor to public lands. I have closely followed the development of wind power in the Columbia Gorge and Hills, including field visits to many projects. I serve as an environmental representative on the technical advisory committees of three wind power projects in the area. In your environmental studies and assessment, I encourage you to consider the following:

Scope of the Project

The Scoping Notice for the project states that the applicant is proposing to construct and operate up to fifty 1.2- 2.5-megawatt (MW) wind turbines with a maximum generating capacity of 75 MW on a 1,152-acre site in Skamania County. However, that Notice does *not* reflect the full scope of the project contemplated by the applicant.

SDS d.b.a. Whistling Ridge Energy LLC (SDS) has also proposed to construct 32 additional wind turbines on 2,600 acres of adjacent public land owned by the Washington Department of Natural Resources in Klickitat County. An Environmental Checklist prepared by the Washington Department of Natural Resources (DNR) on December 15, 2008, states that "the DNR has received an application from SDS Timber Company to

lease for wind power purposes." That application—and the wind project for which it lays the groundwork—should be part of the EFSEC/BPA environmental review.

Although SDS claims it simply wants to "study" the possibility of a "phase 2" expansion on the DNR lands, turbine layouts and other preliminary plans clearly show intent to include these lands in the Whistling Ridge project. SDS has stated that the larger project would be more viable economically.

SEPA and NEPA do not allow a piecemeal approach to project evaluation. They require that EFSEC and BPA study the likely environmental impacts of the entire project, which will encompass lands in both Skamania and Klickitat Counties. According to WAC 197-11-055(2), the lead agencies must prepare an environmental impact statement "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified."

It is not too early to evaluate the project proposal in its entirety. SDS has submitted a site map that is no less detailed than the maps typically submitted with Klickitat County wind project applications, and has stated that it intends to begin construction in 2010. SDS has proposed connecting the entire project to the BPA power grid, and is in the BPA queue for an interconnection.

It appears that SDS is attempting to avoid full review by holding back the Klickitat County portion of its project, possibly because the company expects a more lenient review process in Klickitat County than in Skamania County. Changing the name of the project from Saddleback to Whistling Ridge has only added confusion to the review process. Regardless of what the project is called, or whether all of the turbines within the project are erected simultaneously, it is clear that SDS plans a large wind project that spans Klickitat and Skamania Counties, and includes 80 or more wind turbines. That is the full scope of the project that should be evaluated in the Environmental Impacts Statement (EIS).

Avian Impacts

All of the DNR land proposed for lease within the Klickitat County portion of the project falls within critical habitat for the northern spotted owl, a species that is not only endangered but has continued to decline since the adoption of the DNR's Habitat Conservation Plan. Even as the HCP is failing miserably, SDS is proposing to undermine the plan by allowing commercial-scale energy development within known spotted owl circles and a Spotted Owl Special Emphasis Area.

It should be obvious to all concerned that a commercial wind energy project is *not* appropriate for habitat that is designated as a nesting, roosting and foraging area for a federally endangered species. It is within EFSEC's and BPA's power to forestall a tremendous amount of unnecessary work by the project proponent, Klickitat County, the U.S. Fish and Wildlife Service, the Washington Department of Fish and Wildlife, local residents and a host of other stakeholders by evaluating the impacts of the DNR portion of the

Whistling Ridge wind project within the scope of its SEPA review. To do otherwise is irresponsible, and has already resulted in the construction of wind projects on state-owned lands where they are completely inappropriate (for example, golden eagle nesting territory within the Windy Point project in Klickitat County).

The EIS commissioned by Klickitat County for its Energy Overlay Zone stated (on page 2-15 of the Final EIS) that "forested areas host higher concentrations of owl and other sensitive species habitats." The EIS recommended that areas with high concentrations of forested habitats be excluded from the Energy Overlay Zone because of their "higher potential for use by sensitive species and avian species likely to be impacted by wind turbines." Despite this recommendation and acknowledgement that spotted owl habitat is not appropriate for wind power development, Klickitat County erroneously included some of this habitat within the Energy Overlay Zone—paving the way for companies such as SDS to gain access to these lands for wind development.

As stated in the SEPA checklist for DNR's Whistling Ridge lease, "the entire area of this proposal is environmentally sensitive." The state's Habitat Conservation Plan for the area, which includes protections for northern spotted owls, must be considered as part of your scoping. This species has continued to decline on federal lands, which makes the state's HCP more important than ever. There are only an estimated 500 northern spotted owl pairs remaining in all of Washington state. We cannot afford to lose two or three active nests, even for the laudable goal of providing renewable energy.

Spotted owls are not the only species likely to be significantly impacted by the proposal. Klickitat County's Energy Overlay Zone EIS also found high use of forested habitats by other raptors. The SDS map for the proposed project shows ridge-top locations for turbines, and these are typically the worst possible locations from an avian perspective—i.e., likely to result in the highest number of bird collisions.

There are also reports of bald eagle nests at the proposed wind site. Your scoping should include an aerial nest survey to ascertain whether raptor nests are present and active.

Scoping must include avian and bat studies to find out what species are present at the site, and in what numbers. However, please bear in mind that all of the previous studies done in the local area have grossly underestimated the impacts on raptors and bats. For example, the SEPA Environmental Checklist done for Big Horn—Klickitat County's first major wind project—estimated that the project would kill three raptors per year. Post-construction monitoring has found that the project kills at least 10 times as many raptors, and twice as many bats, as predicted. Monitoring at the White Creek project is not yet completed, but the preliminary results there show much higher raptor fatalities than expected. These projects were constructed in areas that were considered relatively "safe" for raptors, not in prime raptor habitat such as the Whistling Ridge site.

Wind projects in our region have already killed at least three ferruginous hawks, a state threatened species. The Goodnoe Hills project recently killed a golden eagle, a federally

protected species. Multiply these impacts across dozens of projects up and down both sides of the Gorge, and you have population-level impacts.

Impacts on Fish and Other Wildlife

Birds are not the only animals likely to be impacted by the proposal. Bats and other mammals, insects and fish will also be affected. Bat populations in the Whistling Ridge area have not been carefully studied, but scientists have learned that turbines cause bat deaths through air-pressure effects on the animals' lungs, as well as direct strikes.

The creeks within the DNR portion of the project contain several drainages to the White Salmon River, which has both anadromous fish and priority resident fish species, and is already listed under section 303(d) for impaired water quality. Mill Creek, within the Whistling Ridge "expansion" proposal, has priority resident fish species.

Wind projects also have indirect impacts on fish, and these too must be considered. One indirect impact comes from the backup power source. Here in the Pacific Northwest, where wind projects are typically "integrated" with hydropower, such integration is already affecting fish passage in the Columbia River and its tributaries.

The hydropower system is already "oversubscribed" by multiple wind projects and further integration of these two energy resources is likely to mean that water is released from Columbia River pools at times that are not optimal for salmon and other endangered fish. We have already seen some of these impacts from nearby wind projects, which tend to produce much of their energy in the months when there is plenty of water in the river, and have at times required excessive spill that can give fish "the bends."

Impacts of Wind Integration

Wind is an intermittent power source, and wind turbines typically operate at only 30 percent of capacity. When the wind isn't blowing, power must come from another energy source capable of supplying 100 percent of that power at any given moment.

As part of your scoping, EFSEC and BPA should consider what will be the backup power source for the Whistling Ridge Energy Project. For example, if hydropower will be the backup, you must consider indirect impacts on fish, as mentioned above. If backup power will be provided by a natural-gas-fired power plant, the impacts of that power plant should be considered along with the impacts of the wind project. Williams is proposing a new gas line for the Whistling Ridge area, and the substation and transmission inter-tie lines proposed for the Whistling Ridge area could signal the advent of additional power plants in the area. These should be evaluated along with impacts of the infrastructure currently being proposed.

SDS does not have a good track record for energy development in our area. The company has previously proposed installing diesel generators on Bald Mountain in the Husum area. Prior to that, SDS's plans for a co-generation plant in Bingen cost BPA ratepayers

$20 million. Before we rush into another costly venture requiring major transmission infrastructure, it's time to look at what other power sources would be required to support wind power development in our area. Again, the purpose of an EIS is to look at long-term and cumulative impacts, rather than a piecemeal approach.

Infrastructure Impacts

Much of the focus of environmental impact assessment has been on the wind turbines. The impacts from roads, power lines, substations, meteorological towers, quarries and other infrastructure may be even more significant. Any development that removes vegetation, such as a road or transmission line, impedes the migration of many animals, and some animals will not cross these barriers at all. This creates fragmentation of forest habitat, which is one of the biggest risks to biodiversity and species survival.

A study done at the Foote Creek Rim wind project in Wyoming suggests that meteorological (met) towers may be even more dangerous for birds than turbines, although this study has not been replicated elsewhere. Although met towers are not as large as wind turbines, some have guy wires that are difficult for birds and bats to detect. If EFSEC is going to allow development of met towers, it should require fatality monitoring at these towers.

Viewshed

Aesthetics are not my primary concern but certainly they are a value that was meant to be protected by the National Scenic Area (NSA) regulations in this area. While some people may not be bothered by the sight of 400-plus-foot-tall spinning machines, they are definitely not "natural" and not in keeping with the NSA's definition of scenic values.

Those of us who live here have worked long and hard, and many have made personal sacrifices, in order to preserve the scenic value of these lands for all to enjoy. It would not be right for one company to destroy those values purely for its own commercial benefit.

The view at night may be even more altered than the daytime view. Anyone who lives next to a large wind project in a rural area can tell you that the FAA lighting required for towers of this size forever alters the view of the night sky.

Public Safety and Transportation

The public and private roads in the Underwood area are not well suited for the heavy equipment and traffic required to construct and service wind turbines. The Cook-Underwood Road is narrow, winding and located on steep slopes in places. SR-14 is one of the most dangerous of state highways, with the river on one side and cliffs on the other. Rock falls are common and many people are afraid to drive this road even without the possibility of meeting a huge truck carrying an oversize load. The Hood River Bridge is also narrow and outdated, and cannot accommodate oversize loads without closing

traffic from one direction. In Klickitat County we have seen road closures and heavy damage to public roads from wind project construction. These impacts on public safety and traffic must be evaluated as part of the EIS.

Noise

Already people in this area hear the noise from the interstate, state highway, and two railroad lines. Noise carries up some canyons in the area. I live 10 miles, as the crow flies, from the railroad but I can often hear the whistle blow.

The decibel level is not the only measure of the impacts of noise. Wind turbines create low-frequency noise that can travel long distances and may have unanticipated health impacts.

Your review should include a noise modeling study that looks at the micro-siting of the turbines and the topography of the area. Please bear in mind that noise downwind from turbines is different than upwind so measurements need to be made accordingly.

Recreational Impacts

Hikers, bikers, horseback riders, hunters, campers, birdwatchers, and other recreational interests use both public and private lands in the vicinity of the Whistling Ridge project. SDS recently closed its lands to public access, citing concerns about safety and vandalism. It is probably no coincidence that, around the same time, a trail kiosk for the Whistling Ridge trail was removed from the adjacent DNR land. The trail and campsite on this public land is now obscured, although the trail is still marked on a sign near Northwestern Lake.

The Whistling Ridge trail follows the ridgeline all the way from Underwood to Mt. Adams. The closure of SDS lands has made this public trail more important than ever for local recreation. If the DNR leases land to SDS as part of the Whistling Ridge "expansion," the lease would allow SDS "to restrict access to wind farm projects to protect the capital investments or to ensure public safety," according to DNR. In other words, the wind project could mean the end of public access to the Whistling Ridge trail and other recreational opportunities in the area.

Compatibility and Zoning

Please consider compatibility with surrounding land uses and county zoning when conducting your environmental assessment. Within the Skamania County portion of the proposed Whistling Ridge project, for example, industrial-scale wind projects are not allowed under the current zoning.

Alternatives

Any SEPA/NEPA analysis must look at the full range of alternatives to the proposed project, including the no-action alternative. SDS owns huge tracts of land within Skamania and Klickitat Counties, some of which may be better suited for wind development than these lands containing spotted owl circles.

Cumulative Impacts

Your analysis should include a look at the cumulative impacts of wind projects in our region. The BPA's own interconnection queue shows dozens of projects that are either permitted or awaiting permits. There are many other projects that are in the works but not yet in the queue. From Whistling Ridge all the way to Walla Walla, wind developers are erecting a wall of turbines along the hills on both sides of the river. BPA and EFSEC have a much better understanding of the scope of planned development than other agencies, and I hope you will consider these cumulative impacts as part of your review.

The current gold rush to construct wind projects is reminiscent of last century's love affair with hydropower. We now know that dams provide clean energy but also take a heavy toll on salmon and other species. This time around, we cannot afford to rush headlong into "green" energy development with a full consideration of the consequences.

Thank you for considering my comments.

Sincerely,

Dawn Stover
[redacted]
White Salmon, WA 98672
(509) 493-[redacted]
[redacted]@hughes.net

cc: Governor Christine Gregoire
Commissioner of Public Lands Peter Goldmark
Harkenrider?
Washington Audubon?

Dawn Stover
[redacted]
White Salmon, WA 98672
tel: 509 493 [redacted]
email: [redacted]@hughes.net

Scoping Comment #370

Bhavnani, Monica (CTED)

From: Greg MacDonald [redacted]@diablosales.com]
Sent: Monday, May 18, 2009 4:54 PM
To: CTED EFSEC
Subject: windmills on Underwood Mountain

As an Underwood property owner, I am opposed to windmills on Underwood Mountain. The environmental impact as well as the visual impact, as they would be located so close to, and visible from, the boundary of Scenic Area makes them inappropriate.

Best Regards,

Greg MacDonald- 509 493 [redacted]

Scoping Comment
#371

Bhavnani, Monica (CTED)

From: Jessica Walz[redacted]@gptaskforce.org]
Sent: Monday, May 18, 2009 4:59 PM
To: CTED EFSEC
Subject: Whistling Ridge Scoping Comments
Attachments: Whistling Ridge Project.doc

Please accept the attached comments on behalf of the Gifford Pinchot Task Force regarding the scoping notice for the Whistling Ridge Project. If you have any questions please do not hesitate to contact me.

Thank you,

Jessica

Jessica Walz
Conservation Program Director
Gifford Pinchot Task Force
[redacted]
Portland, OR 97205
Phone: 503-221-[redacted]
Fax: 503-221-[redacted]
[redacted]@gptaskforce.org
Web: www.gptaskforce.org

GIFFORD PINCHOT TASK FORCE

917 SW Oak Street, Suite 410 Portland, OR 97205 Phone: (503) 221-2102 Fax: (503) 221-2146

May, 18, 2009
Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172

Re: **Whistling Ridge Energy Project**

Submitted VIA E-mail

Dear Responsible Official:

I am writing on behalf of the Gifford Pinchot Task Force (GP Task Force) to comment on the proposed Whistling Ridge Energy Project. The Task Force supports the biological diversity and communities of the Northwest through conservation and restoration of forests, rivers, fish, and wildlife. The GP Task Force is a non-profit organization with over 3,500 members in the Pacific Northwest. One of our primary campaigns focuses on protection and restoration of public lands and the preservation of critical habitat for endangered and threatened wildlife. Although we are supportive of finding alternative ways of producing energy, we are concerned by the lack of sound monitoring in this area for Northern Spotted Owl and Bats. We are also concerned by the location as the land is very near the boundary of the Gifford Pinchot Task Force. Clearing land for large scale wind projects and increasing road usage can have a substantial edge effect on our public forest lands. Thank you for the opportunity to comment on the plan.

We are concerned by the lack of adequate monitoring of Northern Spotted Owl. Although it is stated in several documents that no spotted owl were detected in the area, the area is known as a sensitive location with historic spotted owl nesting sites. As our forest land continues to be cut and other owls continue to invade our Pacific Northwest forest, spotted owl are marginalized. Without adequate habitat this species will be pushed to extinction. Developing a project in a sensitive location may have adverse consequences on the owl's existence. The EIS should include updated monitoring data for existence, as well as suitable breeding or foraging habitat. The project scope should be limited to exclude any suitable habitat to protect potential suitable forest habitat for the spotted owl.

Additionally, wildlife are also present in this area and monitoring should be done as to the type of wildlife present and effects this project will have on suitable habitat. Clearing forest habitat will fragment ranges and disperse wildlife to other areas. These effects should be adequately studied and included in the EIS.

Roads also have a tremendous impact on the environment. Roads wash sediment into streams, they fragment habitat, and they can fail causing more damage to stream environments by heavy sediment impacts. Please include a thorough discussion of roads and their impacts in the EIS.

Federal agencies are required by NEPA "to the fullest extent possible ... to use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." 40 C.F.R. § 1500.2(e). NEPA also requires the agency "study, develop, and describe appropriate alternatives to the recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses." 40 C.F.R. § 1501.2 (c). Alternatives could include lessening road impacts, removing wind turbines closest to the edge of the national forests, and removing turbines from spotted owl habitat.

The Ninth Circuit stated in *California v. Block* that "[a]s with the standard employed to evaluate the detail that NEPA requires in discussing a decision's environmental consequences, the touchstone for our inquiry is whether an EIS's selection and discussion of alternatives fosters

informed decision-making and informed public participation." *California v. Block*, 690 F.2d 753, 767 (9th Cir. 1982).

NEPA requires the agency to provide high quality science to support an environmental analysis. 40 C.F.R. § 1502.24. Furthermore, agency's are required under NEPA to disclose information to ensure that both the agency has carefully and fully contemplated the environmental effects of its action, and that the "public has sufficient information to challenge the agency." Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1151 (9th Cir. 1998); Robertson v. Methow Valley Citizens, 490 U.S. 332, 349 (1989). Without such information, the public does not adequately know how to comment on the action.

In order to comply with NEPA, "the discussion of alternatives 'must go beyond mere assertions' and provide sufficient data and reasoning to enable a reader to evaluate the analysis and conclusions and to comment on the EIS." *Citizens Against Toxic Sprays v. Bergland*, 428 F. Supp. 908, 933 (D. Or. 1977). A detailed and careful analysis of the relative merits and demerits of the proposed action and possible alternatives is of such importance in the NEPA scheme that it has been described as the "linchpin" of the environmental analysis. For this reason, the discussion of alternatives must be undertaken in good faith; it is not to be employed to justify a decision already reached. *Id.*

"Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7. NEPA documents must include an examination of the cumulative impacts of the proposed actions. *Neighbors of Cuddy Mtn. v. U.S. Forest Service,* 137 F.3d 1372, 1379 (9th Cir. 1988). In addition to discussing impacts, NEPA requires the agency to assess the impacts of the proposed project in the context of existing impacts. *Lands Council v. Powell,* 379 F.3d 738, 745 (9th Cir. 2004).

Multiple projects in the same geographic area have cumulative impacts, which are defined as "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." 40 C.F.R. § 1508.7. Under NEPA, "significance exists if it is reasonable to anticipate cumulatively significant impacts on the environment," and a designation of "significance cannot be avoided by terming an agency action temporary or by breaking it down into small component parts." *Id.* § 1508.27(b)(7). Moreover, NEPA makes

clear that "cumulative actions, which when viewed with other proposed actions, have cumulatively significant impacts," should be discussed in the same impact statement." Id. § 1508.24(a)(2). We would like to see a thorough discussion of the impacts of this project and the impacts of future projects that are under discussion.

Thank you for the opportunity to comment on the scoping notice for the Whistling Ridge Project. If you have any questions or concerns please do not hesitate to contact me at (503) 221-2102 ext. 101 or jessica@gptaskforce.org.

Thank You,

Jessica Walz

Jessica Walz
Conservation Director
Gifford Pinchot Task Force

Scoping Comment #372

Bhavnani, Monica (CTED)

From: Rick Till [redacted]@gorgefriends.org]
Sent: Monday, May 18, 2009 4:59 PM
To: Nathan Baker; Fiksdal, Allen (CTED)
Cc: CTED EFSEC; comment@bpa.gov; Andrew M. Montaño; Marvin, Bruce (ATG); Gary Kahn
Subject: RE: Whistling Ridge Energy Project - Friends' Scoping Comments - Part 1

Attachments: Friends' Scoping Coments - Part 2.pdf

Friends' Scoping Coments - Par...

Dear Mr. Fiksdal,

Please find attached Part 2 of the scoping comments from Friends of the Columbia Gorge.

Thanks,

Richard Till, Land Use Law Clerk
Friends of the Columbia Gorge
[redacted]@gorgefriends.org
[redacted]
Portland, Oregon 97204-2100
(503) 241-[redacted]
Fax: (503) 241-[redacted]

Become a Friend of the Columbia Gorge at www.gorgefriends.org

-----Original Message-----
From: Nathan Baker
Sent: Monday, May 18, 2009 4:06 PM
To: Fiksdal, Allen (CTED)
Cc: efsec@cted.wa.gov; comment@bpa.gov; Andrew M. Montaño; H. Bruce Marvin; Rick Till; Gary Kahn
Subject: Whistling Ridge Energy Project - Friends' Scoping Comments - Part 1

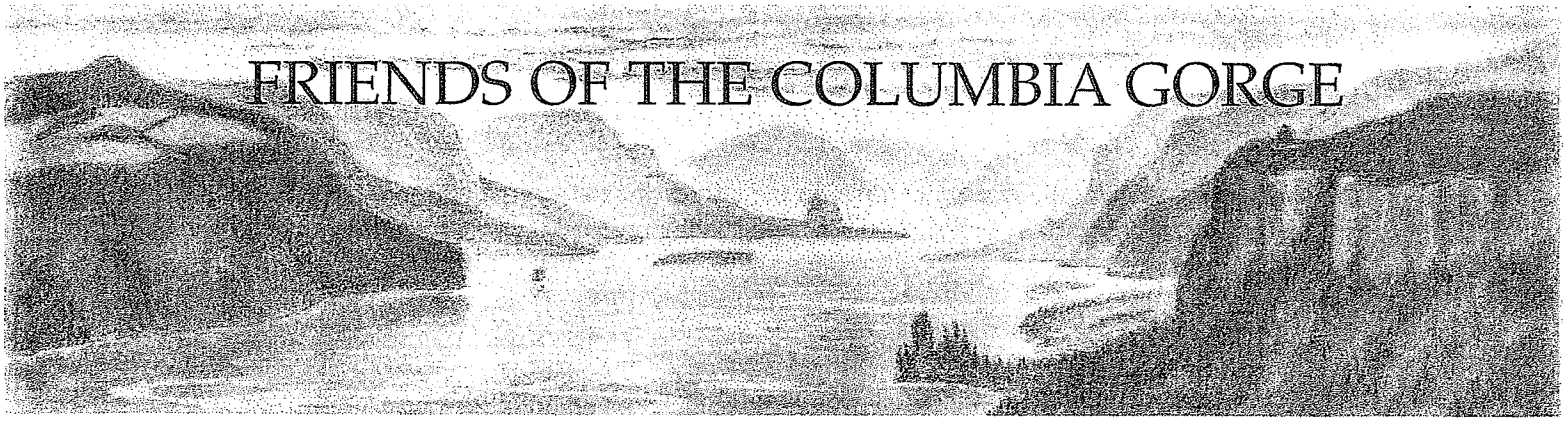
Dear Mr. Fiksdal:

Please find attached Part 1 of the scoping comments of Friends of the Columbia Gorge on the above-referenced proposal. Rick Till will e-mail Part 2 shortly. Paper copies of both parts will be sent in today's mail.

Thank you for your time and consideration. If you have any questions or comments, please do not hesitate to contact me.

Nathan Baker, Staff Attorney
Friends of the Columbia Gorge
[redacted]@gorgefriends.org

[redacted]
Portland, Oregon 97204-2100
(503) 241-[redacted]
Fax: (503) 241-[redacted]



VIA E-MAIL AND FIRST-CLASS MAIL

May 18, 2009

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum St. SE
Olympia, WA 98504-3172

Re: SEPA & NEPA Scoping for the Proposed Whistling Ridge Energy Project – Application No. 2009-01

Dear Mr. Fiksdal:

Friends of the Columbia Gorge has reviewed the above-referenced proposal and would like to provide the following scoping comments pursuant to SEPA and NEPA. Friends is a non-profit organization with approximately 5,000 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area.

SEPA and NEPA require that the decision making agencies take a hard look at the direct, indirect, and cumulative impacts of the proposed Whistling Ridge Energy Project. The Environmental Impact Statement (EIS) must include thorough analysis of the direct, indirect, and cumulative impacts to wildlife and aesthetic resources. To obtain accurate information on the likely impacts, both EFSEC and BPA must consult with agencies that have expertise or jurisdiction in managing the resources that would be adversely impacted.

Based on a cursory review of the proposed development, the project would cause significant adverse impacts to aesthetic resources in the Columbia River Gorge. This includes adverse impacts to viewsheds protected by the Columbia River Gorge National Scenic Area and views from the Lower White Salmon Wild and Scenic River Area, the Historic Columbia River Highway, the Lewis and Clark National Historic Trail, and the Oregon Pioneer National Historic Trail. Based on the likely significant adverse impacts to these resources, EFSEC and BPA must consider an alternative that would avoid any

impacts to views from these locations. In the interest of conserving administrative resources, this alternative should be identified as the preferred alternative at the outset of EIS preparation.

Wildlife Impacts

Modern industrial wind energy facilities have the potential to cause significant adverse impacts to range of wildlife species. The industrial-scale development can cause direct mortality from collisions with wind turbine blades and through barotraumas when bats fly too close to spinning blades. Facilities can also cause indirect impacts through displacement and habitat fragmentation. The EIS must include analysis of how the facility would impact sensitive and listed species such as the northern spotted owl and northern goshawk.

EFSEC and BPA must thoroughly analyze how the proposed facility would impact wildlife. This analysis must include avoidance measures, including relocating or removing turbines from the project. Only after avoidance is considered should EFSEC or BPA analyze mitigation measures.

The EIS must indicate all bird species that may or do occur within the Project Site that are protected under the federal Migratory Bird Treaty Act,16 U.S.C. §§ 703–712, and any other state or federal legislation designed to protect avian species.

The EIS must analyze the likely cumulative impacts of wind energy development in the region. Currently approximately 1,800 megawatts of wind energy has been permitted in Klickitat County alone. To date, no cumulative impacts study has been conducted to ascertain the region-wide impacts of wind energy facilities on wildlife. During review of other wind energy facilities in the region both the Washington Department of Fish and Wildlife and the United States Fish and Wildlife Service have called for cumulative impacts analysis. See USFWS Letter, attached as Exhibit A. To date, no cumulative impacts analysis has occurred. This must be included before EFSEC and BPA permit additional wind power development, especially development in forested areas where there is a higher probability of adverse impacts to wildlife.

Notably, monitoring reports on the Big Horn Wind Project in Klickitat County have shown higher incidence of avian mortality than pre-construction survey and modeling predicted. See Big Horn Avian Mortality Report, attached as Exhibit B. EFSEC and BPA must ensure that the EIS uses the best available science for surveying and modeling protocols to ensure that projected impacts are sufficiently accurate and precise. The mortality projections should also include a margin for error. Based on this analysis the EIS should evaluate alternative siting options that would avoid or reduce wildlife impacts. The EIS should also evaluate potential post-construction mitigation measures in case actual mortality exceeds predicted mortality.

Facility design and operating conditions must also be considered in the EIS. Brightly lit substations have been associated with large clusters of bird fatalities at wind

facilities. The EIS must include detailed analysis of lighting at all turbines and other facility structures and how this lighting would impact birds and bats. Also, the wind speeds at which turbines operate may correlate to when specific species of bats or birds may be at the highest risk of collision. Creating operating protocols for what wind speeds turbine blades will be allowed to operate may provide opportunities to craft mitigating conditions that will avoid adverse impacts.

Finally, the EIS must provide detailed analysis of how the proposed facility complies with the Washington Department of Fish and Wildlife Wind Siting Guidelines.

Aesthetic Impacts

The proposed facility would likely cause significant adverse impacts to sensitive viewsheds. Most notably, this includes viewsheds protected by the Columbia River Gorge National Scenic Area Act. These protected viewsheds overlap with views from several sensitive areas, including the Historic Columbia River Highway, the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, and the Lower White Salmon Wild and Scenic River.

EFSEC must ensure environmental impacts to the views from these locations are thoroughly analyzed. *See Swift v. Island County*, 87 Wn.2d 348, 552 P.2d 175 (1976) (requiring an EIS for a residential development that would have significantly impacted sensitive areas in the vicinity, including Whidbey Island Historical District, which is listed on the National Register of Historic Sites, Fort Casey Historical State Park, and Crockett Lake, which is valuable waterfowl and shorebird habitat).

The proposed facility is proposed to be immediately adjacent to the National Scenic Area. As a threshold matter, the EIS must ascertain the precise location of the Scenic Area boundary to evaluate whether the proposed industrial facility would be located within the Scenic Area. To do so, EFSEC and the PBA must determine whether the NSA boundary has been formally surveyed. The results of such a survey must be approved by the Forest Service.

Many of the individual turbines may be highly visible, both during the day and the night, from within the National Scenic Area. This includes views from I-84, the Columbia River, Washington State Route 141, Panorama Point, Cook-Underwood Road, and the Historic Columbia River Highway. The EIS must thoroughly analyze the impacts of individual turbines on the viewshed as well as the cumulative impacts of all visible turbines.

The preferred methodology for evaluating aesthetic impacts in the Scenic Area is the Forest Service's Scenic Management System. This system creates a formal process for ascertaining viewer expectations in relationship to the complexity of the viewed landscape. EFSEC and the BPA should also consider the National Academy of Sciences' recent document entitled, Environmental Impacts of Wind-Energy Projects (National

Academies Press, 2007), which includes methodology for analyzing possible impacts from wind development on aesthetic resources.

SEPA also requires that the impacts analysis include an evaluation of whether the proposed action would be consistent with the goals and purposes of laws and regulations. WAC 197-11-330(3)(e)(iii). This regulatory review must include analysis of the degree that the proposal would be consistent with the criteria for protecting scenic resources found in the Management Plan for the Scenic Area. The EIS must identify the applicable scenic standards and evaluate whether the proposal would meet the objectives of the Plan. Any portion of the project that would frustrate the purposes of the Act and the Management Plan should be considered a de facto significant impact. In performing this evaluation, EFSEC and BPA must consult with the National Scenic Area office of the U.S. Forest Service.

EFSEC must also consider possible cumulative impacts from other projects proposed along the Scenic Area boundary. These include the Windy Point and Windy Flats facilities in Klickitat County.

The project would be highly visible from the Historic Columbia River Highway from Viento State Park to approximately Mosier, Oregon. This includes portions of the HCRH that have been restored since the adoption of the National Scenic Area Act and additional portions that are slated for restoration within the next decade. Portions targeted for restoration include the historic Mitchell Point Tunnel and its carefully crafted windows carved out of basalt. The restored tunnel will provide views of the Underwood Bluff and Underwood Mountain. The restoration work would continue to Ruthton Point Park, just west of the Hood River, Oregon. The details of restoration efforts can be found in The Historic Columbia River Highway Master Plan, prepared by the Oregon Department of Transporation and available at: http://www.oregon.gov/ODOT/HWY/HCRH/documents.shtml (hereby incorporated by reference; *see also* http://hcrh.org/hwyneeds.html).

The viewshed from this portion of the Historic Highway would be dominated by the southern-most potions of the proposed wind facility. The windows on a reconstructed Mitchell Point Tunnel would look directly north to the A-Array of the Whistling Ridge Energy Facility. Currently, that view is dominated by views of Underwood Bluff, which is designated as GMA Open Space under the Management Plan for the Scenic Area. The area is designated Open Space in part because of the outstanding scenic views.

The EIS must also address the degree that he proposal would frustrate the purpose of regulatory mechanisms that are designed to protect this viewshed. The Underwood Bluff is designated Open Space. This designation is required by the Scenic Area Act for location with "outstanding scenic views and sites," "historic trails and roads and other areas which are culturally or historically significant" 16 USC 544 Section 2(A)(l). Open Space designations are reserved for the most sensitive resources in the Scenic Area and as a result Open Space areas receive the highest level of protection. Management Plan at II-

3-1–II-3-12. Developing large-scale industrial infrastructure that would protrude into this viewshed would directly frustrate the purpose of the Scenic Area Act.

The EIS must also document the likely impacts to views from I-84. In addition to the length of I-84 from Viento State Park to Hood River, there must be thorough analysis of impacts to views from the stretch of I-84 from Hood River, Oregon, to approximately Mosier, Oregon. Turbines in northern portion of the project would highly visible from the east bound lanes of I-84. The EIS must include detailed analysis of how this view would be altered, including avoidance and mitigation measures.

The aesthetics impacts analysis must include a linear analysis of views from linear key viewing areas and overlapping historic trail viewsheds. This includes views from the Columbia River, Interstate 84, the Historic Columbia River Highway, including abandoned sections that are slated for restoration, Cook-Underwood Road, and Washington State Route 141. Analysis must include the length of the KVAs where the project would be visible, the number of turbines that would be visible for each length, the distance from the project for each length, and whether nighttime lighting would be visible.

Finally, the EIS must document the likely impacts from both daytime and nighttime lighting. While lighting is required by the Federal Aviation Administration, the location of required lighting must be documented in the EIS. Based on this information impacts can be documented and appropriate avoidance or mitigation measures can be reviewed.

Consultation with agencies with jurisdiction or expertise.

EFSEC must consult with and obtain comments from agencies that have jurisdiction or expertise regarding the impacted environment. RCW 43.21C.030(2)(d); *see also* WAC 197-11-920. The impacted environment includes the Columbia River Gorge National Scenic Area, the Lower White Salmon Wild and Scenic River Area, the Gifford-Pinchot National Forest, the Lewis and Clark National Historic Trail, the Oregon Pioneer National Historic Trail, the Historic Columbia River Highway, the Mt. Hood National Forest, and state parks in Washington and Oregon.

Agencies with jurisdiction or expertise in these areas include the Columbia River Gorge Commission, the National Scenic Area office of the USDA Forest Service, the Gifford-Pinchot National Forest, the National Park Service, the Oregon Department of Transportation, the Oregon Parks and Recreation Department, the Washington State Parks and Recreation Commission, the Oregon Department of Parks and Recreation. Agencies with expertise on wildlife issues include the U.S. Fish and Wildlife Service and Washington State Department of Fish and Wildlife.

Finally, the Washington Department of Natural Resources must be consulted regarding compliance with the Washington Forest Practices Act, which requires that all proposals that would convert the use of land to land uses other than commercial timber

operation. Forest land conversions require SEPA review by the county and a Forest Practice approval from the Washington DNR.

The EIS must include the results and conclusions of consultation with the above-referenced agencies regarding impacts to resources under their jurisdiction or expertise.

General mapping rrrors

The application at Figure 4.2-4 includes a mapping error. The entire area within T3N, R10E, Section 18 that lies south of the BPA transmission lines is zoned For/Ag 20. The application depicts part of this area as unmapped. EFSEC and BPA must correct this error in evaluating the proposed project for consistency with laws and regulations.

Impacts to grid capacity and required back-up power

The BPA must include cumulative impacts analysis of how the BPA will be able to integrate additional intermittent power sources into the grid. The BPA has previously completed some work in ascertaining how new wind energy projects can be accommodated on the grid. This cumulative impacts analysis must be incorporated into the EIS for the subject proposal. To the extent that the BPA's wind integration work meets the requirements of SEPA and NEPA, the current EIS may be tiered to prior environmental analysis.

Water quality impacts

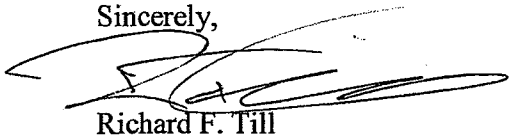
The EIS must evaluate the relative impacts of lower probability storm events that are reasonably foreseeable. The project area includes headwaters for tributaries to the White Salmon River and the Little White Salmon River. Condit Dam on the White Salmon River is currently slated for removal in 2010. Removal of Condit Dam will restore habitat for several species of ESA listed species. The Little White Salmon River is also habitat for anadromous fish species. In addition, the Little White Salmon is currently failing to meet water quality standards established by the Clean Water Act. The EIS must address the impacts of the stormwater run-off on these fish bearing water resources. This must include cumulative impacts analysis of impacts from the creation of impervious surfaces, the construction of industrial-scale roads that would generate sheet run-off, and impacts from deforestation in the two watersheds that contribute to increased pulse stream flows and increased sedimentation.

Conclusion

The Whistling Ridge Energy Project would be sited within sensitive viewsheds for several areas designated for protection, including the Columbia River National Scenic Area, the Lower White Salmon Wild and Scenic River Area, the Historic Columbia River Highway, and the Lewis and Clark National Historic Trail. The project would also be located in a forested area that is habitat for several threatened and sensitive species. The EIS must thoroughly document all of the likely direct, indirect, and cumulative impacts to

these resources. The EIS should include a preferred alternative that avoids impacts to these resources.

Sincerely,



Richard F. Till
Land Use Law Clerk