

Bhavnani, Monica (CTED)

From: Rick Till [REDACTED]@gorgefriends.org
Sent: Monday, May 18, 2009 5:01 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.attachments.pdf



Friends' Scoping
Coments - Par...

Dear Mr. Fiksdal,

Please find attached the attachments to Part 2 of the comments submitted by Friends of the Columbia Gorge.

Thanks,

Richard Till, Land Use Law Clerk
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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

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United States Department of the Interior

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Reply To: 6320.0005 (07)
File Name: Wind Cascade Wind App Cmts.doc
Tracking Number: 07-1417
TAILS: 13420-2007-FA-0132

June 1, 2007

Mr. Adam Bless
Energy Facility Siting Coordinator
Oregon Department of Energy
625 Marion St. NE
Salem, OR 97301-3737

**Subject: Application for a Site Certificate for the Cascade Wind Project, Wasco
County, Oregon**

Dear Mr. Bless:

The U.S. Fish and Wildlife Service (Service) has reviewed the Cascade Wind Project (facility) application for a site certificate for a proposed 60 megawatt (MW) wind generation facility. The applicant's (UPC Oregon Wind, LLC) proposed facility includes 40 General Electric (GE) 1.5sle turbines with 253-foot rotor diameters on 263-foot towers. The turbines will be sited along ridgetops in three groupings, referred to as the north, central, and south arrays. The proposal includes: 1) approximately 9.64 miles of new roads and turnaround sites; 2) 4.56 miles of existing roads to be upgraded; 3) two permanent meteorological towers; 4) a system of 34.5 kilovolt electrical collection lines, both underground and overhead; 5) an electrical substation; and 6) an operations and maintenance facility with a shop, control room and maintenance area.

The Service has legal mandate and trust responsibility to maintain healthy, migratory bird populations for the benefit of the American public. We work collaboratively with our partners under conventions, treaties, laws and voluntary programs to ensure the conservation of more than 800 species of migratory birds and their habitats. We appreciate the opportunity to provide comments, and we look forward to working with you on this important project.

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EXHIBIT A
PAGE OF

The Service's primary concerns are: 1) cumulative impacts of wind energy projects to migratory birds and bat resources within the Columbia River corridor; 2) the potential for project specific mortality to birds and bats based on the project location adjacent to and within oak woodland, and near two ponds and associated wetlands; 3) adequate mitigation measures to offset unavoidable project impacts to biological resources; and 4) the need for a formal standardized monitoring plan.

Migratory Bird Conservation

The Service's "A Blueprint for the Future of Migratory Birds" and the "North American Landbird Conservation Plan" identify the challenges of conservation of migratory birds. These challenges include habitat loss, degradation, and fragmentation, and dispersed mortality factors, not directly related to habitat loss, that accompany the growth of human populations and the advance of technology. Wind energy development, power lines, communication towers, among others, cause ever increasing direct mortality. Collectively, these factors contribute to population declines and with anticipated future losses in habitat, pose a growing threat to birds and bats. Implementation of on-the-ground bird conservation strategies at Federal, State, local and project level will be necessary to address the steady increase in avian mortality factors, and population declines.

Most Oregon songbirds, wading birds, waterfowl and birds of prey are protected under either the Migratory Bird Treaty Act (MBTA) or the Bald and Golden Eagle Protection Act (BGEPA). The MBTA prohibits the taking of migratory birds except when specifically authorized by the Department of Interior (16 U.S.C. 703-712). The BGEPA prohibits the taking of bald eagles and golden eagles except when specifically authorized by the Department of Interior (16 U.S.C. 668-668d). While the MBTA and BGEPA have no provisions for allowing an unauthorized take, it is recognized that some birds may be injured or killed at wind turbines and power transmission features even if all reasonable measures to avoid injury and death are implemented. The Service's Office of Law Enforcement carries out its mission to protect birds under these Acts not only through investigations and enforcement, but also through fostering relationships with individuals and industries that seek to work proactively to mitigate the negative impacts of wind energy projects on protected birds. While it is not possible to absolve individuals, companies, or agencies from liability when they commit, assist, or authorize violations of Federal wildlife laws, the Service's Office of Law Enforcement and U.S. Department of Justice have previously exercised enforcement and prosecutorial discretion with entities that have made good-faith efforts to avoid the take (killing or injuring) of protected birds. We recommend discussions continue between the Service, ODFW, ODOE, and UPC Oregon Wind LLC, to ensure wind energy projects minimize and/or avoid construction and operational effects on protected birds. We further believe, due to the considerable uncertainty regarding the potential fatality rate of bats from wind turbine strikes, that provisions for protection of bat populations also be discussed.

The Service recognizes the local efforts by wind energy developers to minimize the risk to birds and bats from disturbance, habitat loss, and collisions with turbines and power lines. However, as wind energy development continues to expand and concentrate in wind rich areas such as the Columbia River corridor, a strategic approach to assess and offset direct and cumulative impacts to birds and bats should be incorporated into all proposed facilities to establish a consistent

approach to further minimize the take of migratory birds, and to offset the direct mortality to bats.

Cumulative Impacts

We recommend that an expanded environmental impact analysis include a cumulative effects analysis that incorporates all the bird and bat survey data conducted for existing, planned and reasonably foreseeable future wind power projects in the same vicinity including projects in Klickitat County to the north and Sherman County to the east. The rapid escalation of wind power projects east of the Cascades along the Columbia River has raised concern that the environmental impacts analysis for bird and bat resources may not adequately describe cumulative effects of planned wind power projects in the same vicinity. For example, based on information within the Klondike III/Biglow Canyon wind power project DEIS, a total of 3,134 MW of electricity or approximately 1,740 turbines (assuming an average of 1.8 MW/turbine) are reasonably foreseeable future wind power projects in the vicinity. Using the mortality rate per turbine provided in similar areas, 42 raptors, 1,740 – 3,480 passerines, and 2,610 – 4,350 bat fatalities would be expected each year for the existing, planned and reasonably foreseeable wind projects including the Klondike III/Biglow Canyon projects. Although mortality rates appear to be significant, the population effects to individual species from turbine mortality can be difficult to discern. The number, location, and type of turbine; the number and type of species in an area; species behavior; topography; and weather all affect turbine mortality rates and potential adverse impacts to regional populations of raptors and bats along the Columbia River corridor.

Project location within Oak Woodlands

Approximately one-half of the proposed turbines in this proposed facility pass through or are immediately adjacent to oak woodland habitats. In Oregon, Oregon white oak (*Quercus garryana*) woodlands provide unique habitat for many plant and animal species, but these habitats are rapidly disappearing due to increased urban and agricultural land use and the encroachment of conifers in oak stands. The Oregon Conservation Strategy (2005) identified a Conservation Opportunity Area (i.e., EC-02. Wasco Oaks) which encompasses the majority of the proposed facility project area. Recommended conservation actions have been identified for the Wasco Oaks area to address altered fire regimes, land use conversion and urbanization, and habitat fragmentation.

In the East Cascades, oak woodlands are relatively rare and occur primarily on the north end of the ecoregion. They are located at the transition between ponderosa pine or mixed conifers forests in the mountains, and the shrublands or grasslands to the east. Valuable habitat features of Oregon white oak include its dead branches and cavities, which provide safe places for bird and bat species to rest and raise young, and the production of acorns that are eaten by a variety of wildlife and are particularly important in the winter, when other foods are scarce.

Since no other newer generation wind projects have been developed in comparable oak woodlands avian/turbine interaction data is unavailable. Based on the unique features of oak woodland, the limited amount of this habitat type within the East Cascades Ecoregion, high wildlife value, and the considerable uncertainty of local fatality rates from the facility for bird and bat species known to occupy oak woodland, the Service recommends that wind power development proceed cautiously in oak woodland, and seek to avoid and minimize impacts

through project design (e.g., using turbines with greater generating capacity (greater than 2.0 MW) in order to reduce the total number of turbines), or consideration of an alternate site.

Recommendations for Mitigation and Monitoring

Since considerable uncertainty exists regarding the potential population level impacts to particular bird and bat species, the Service recommends that the proposed facility include the following recommendations to avoid, minimize, mitigate and monitor project impacts on avian and bats species.

- To mitigate direct and cumulative impact to birds and bats, consider an option to establish a wind energy mitigation fund or fee system to address direct and cumulative effects by protecting and improving habitats in the region. These mitigation funds could be leveraged or combined with other grant programs (e.g., Oregon Watershed Enhancement Board) to offset bird and bat mortalities over the lifespan of the wind energy development.
- Establish a 0.25 mile setback for three turbine locations (1, 11, and 12) from two open water ponds and associated wetlands within the project area. Because ponds serve as a consistently dependable food resource, concentrated foraging and roosting by bird and bat species are expected to occur increasing the fatality rate of nearby turbines. These ponds were identified as an attractant to bird and bat species in the Ecological Baseline Study completed for the project.
- Consider the use of turbines that would have a peak generating capacity greater than 2.0 MW, in order to reduce the total number of turbine within the project area. For example, the proposed facility would need 15 fewer turbines if 2.4 MW turbines were used. This action could significantly reduce bird and bat fatalities within the project area.
- Post-construction mitigation measures should include habitat restoration or preservation of oak woodland habitats. Possible approaches include: 1) Maintain a diversity of tree size and age across the stand, in particular large oak and ponderosa pine trees; 2) remove conifers or small oaks that are competing with larger oaks; 3) maintain snags and create snags from competing conifers to provide cavity habitat; and 4) encourage oak reproduction through planting or protective exclosures (Oregon Conservation Strategy (2005)). Restoration efforts should be developed and implemented in coordination with local and regional experts, and State and Federal agencies.
- For the Pacific Northwest region, the hoary bat (*Lasiurus cinereus*) and silver-haired bat (*Lasionycteris noctivagans*) appear to be at the greatest risk from collision with wind turbines. Overall populations of bats in the region are not well documented. Bat surveys should be completed to determine from a regional perspective the potential risk to these local populations. Surveys should also be completed to determine bat migratory patterns, patterns of local movements through the area, and the response of bats to turbines, individually and collectively.

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- Proposed mitigation measures should include a formal monitoring plan and agreement to ensure that mitigation measures are completed and that habitat restoration and revegetation are effective.
- Monitoring standards and guidelines should be developed and implemented in coordination with local and regional experts, and State and Federal agencies. Statistical comparisons of bird mortality are the most common measure of data collected at these facilities. The unknown impact of new generation turbines on bird and bat mortalities increases the urgency to initiate long-term monitoring. Much of the discrepancy in bird collision data comes from two causes; a lack of comparable methodology between studies, and trying to compare disparately situated sites (Tingley 2003). Once estimates, methods, and metrics are comparable, they can be used to share site, design, and management information with other facilities to reduce harm to wildlife and their habitats.
- Monitor raptor-safe configurations in high risk areas and low risk areas. Periodically inspect to identify areas of concern and report on the installation, efficacy of design, and degradation in the field of whatever bird protection devices are employed (according to published literature on avian power line electrocution, field observations indicate a significant number of bird protection devices are incompletely or improperly installed and may degrade in the field).
- A 34.5-kilovolt overhead collection line has been proposed to link the central array with the south array that crosses, and then parallels Chenoweth Creek for approximately 0.5 miles. We recommend the overhead collection line span Chenoweth Creek and maintain a 200 foot minimum buffer to minimize construction and maintenance impacts on sediment, shade, and large wood recruitment.
- The decommissioning process of the proposed project should be addressed. The expected life span of the project and decommissioning process should be included in the analysis of impacts of the facility.

The Service appreciates the opportunity to provide comment on the proposed facility. We would like to work with you to further protect fish and wildlife resources within the project area. If you have any questions regarding the Service's comments, please contact Jerry Cordova or me at the Bend Fish and Wildlife Office at 541-383-██████████

Sincerely,

Nancy Gilbert

Nancy Gilbert
Field Supervisor

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cc:

Mike Green, USFWS Region 1, Portland, OR.
Estyn Mead, USFWS Region 1, Portland, OR.
Doug Young, USFWS OFWO, Portland, OR.
Chris Carey, ODFW, Bend, OR
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Rose Owens, ODFW, Salem, OR

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Avian and Bat Mortality at the Big Horn Wind Energy Project, Klickitat County, Washington

K. Shawn Smallwood

18 October 2008

The Big Horn Wind Energy Project was constructed as planned, consisting of 133 1.5-MW capacity GE wind turbines arranged in 15 rows. PPM Energy, Inc. was the developer, and prepared the SEPA Checklist for the Big Horn Wind Energy Project in order to obtain the permit to build and operate it. As part of the SEPA Checklist, PPM Energy predicted project impacts, and so provided an opportunity to check on the accuracy of the predictions after a year of fatality monitoring.

PPM Energy predicted the project's impacts to birds and bats would be low (Table 1), based on the low mortality estimates that had been reported by other northwestern wind farms that had already been operating, and based on the findings of the Klickitat County Final Environmental Impact Statement (FEIS). The Klickitat County FEIS divided the County into six strata of relative raptor abundance, and the Big Horn project was located in the lowest stratum.

Table 1. Predicted impacts due to wind turbine collisions in the Big Horn Wind Energy Project. The estimates of impacts for subgroups of raptors was derived from percentages of each group among pre-construction observations, so assuming that species would be killed in proportion to their relative abundance based on visual scans. Bats were estimated by projecting rates reported from other wind farms in the Pacific Northwest.

Species group	Annual Project Fatalities	Fatalities per MW
Raptors	3-4	0.015 - 0.020
American kestrels	1.986-2.648	0.00993-0.01324
Large falcons, i.e. prairie falcons	0.294-0.392	0.00147-0.00196
Buteos	0.165-0.22	0.00083-0.0011
Eagles	0.114-0.152	0.00057-0.00076
Northern harriers	0.078-0.104	0.00039-0.00052
Passerines	267	1.338
Waterfowl	0 to few	~0
Waterbirds/Shorebirds	0 to few	~0
Bats	200	1.0025

The SEPA Checklist also provided predictions of cumulative impacts for Klickitat County, relying on WEST (2004) (Table 2). Those who prepared the Checklist assumed an eventual build-out of 1,000 MW of capacity in Klickitat County. To predict cumulative impacts, they extrapolated mortality estimates among US wind farms to this 1,000 MW of capacity. The estimates had been summarized in Erickson et al. (2001) for birds and Erickson et al. (2002) for bats, and projections of mortality for Klickitat County had been made by WEST (2004).

Table 2. Predicted cumulative impacts due to wind turbine collisions in 1,000 MW of capacity anticipated in Klickitat County, Washington (based on WEST 2004).

Species group	Annual Project Fatalities	Fatalities per MW
Raptors	33	0.033
American kestrels	21.846	0.021846
Large falcons, i.e. prairie falcons	3.234	0.003234
Buteos	1.815	0.001815
Eagles	1.254	0.001254
Northern harriers	0.858	0.000858
Total birds	1,461	1.461
Bats	467-600	0.467-0.600

My objective was to compare estimates of observed mortality after a year of fatality monitoring to the predicted fatality rates. However, I found substantial gaps in the report of the first year of fatality monitoring, which I attempted to resolve with my analysis of the data. Also, some of the methods differed from those I would have used, so I applied my own methodology (Smallwood 2007, Smallwood and Thelander 2008).

METHODS

Kronner et al. (2008) provided no fatality definition, or an explanation of how bird or bat remains were determined to be those of fatalities likely caused by wind turbines. I assumed that standards applied in other wind farm fatality monitoring efforts were applied by Kronner et al. (2008).

I had to assume that the seasons attributed to fatalities were the seasons when the carcasses were found, and not when the bird or bat may have actually died. Because the appendix listing the fatalities did not include estimates of time since death, I could not backdate the carcasses to the season when the fatality likely occurred. I expect there was some unknown level of error in this assumption.

I maintained Kronner et al.'s (2008) omission of fatalities discovered during their clean-up searches from 16-25 October, including two songbirds and one bat. I also used Kronner et al.'s (2008) seasonal search detection rates (Table 6 in Kronner et al. 2008), and I approximated the standard errors of these rates by taking the mean standard errors that could be calculated between the reported 2.5th and 97.5th quantile values. These values differed between the 2.5th and 97.5th quantiles, but only slightly. I ignored the results of the dog trials for searcher detection, because they were small in scope and did not differ from the human search detection rates due to small sample sizes.

I decided not to rely on the scavenger removal trial results that were reported in Kronner et al. (2008), who estimated mean days to carcass removal. I found that mean days to carcass removal is prone to bias, and this bias results in lower estimates of fatality rates (Smallwood 2007). Not only was mean days to carcass removal prone to bias, but the estimates reported by Kronner et al. (2008) were considerably longer than reported by anyone else in the U.S. (Smallwood 2007).

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Further yet, Kronner et al. used game hen chicks as surrogates for bats in scavenger removal trials, and non-endemic species as surrogates for birds. The use of game hens and surrogate species in general can bias the results of scavenger removal trials (Smallwood 2007). To adjust the estimates of fatality rates for scavenger removal, I used Appendix 1 values in Smallwood (2007) corresponding with 14 and 28 day search intervals used by Kronner et al. (2008). For bats, I used small bird removal rates in Smallwood (2007), acknowledging that I, too, had to rely on a surrogate species for bats. Based on the bat removal rates that have been reported from wind farm studies, it was likely that my use of small bird removal rates biased my estimates of bat fatality rates low.

No adjustment was apparently made for the nearness of wind turbines to property boundaries where searches were not allowed on the other side of the boundary. The 90 m search radius was not achievable for some unknown number of turbines, and the extent to which searches were not possible was not reported. I used a map of wind turbines and property boundaries depicted in the SEPA Checklist (CH2MHILL 2004) to measure distances between wind turbines and property boundaries of the turbine rows Kronner et al. (2008) reportedly ran into trouble with the boundaries.

I also decided to use a different estimator and a different means of obtaining error terms associated with the unadjusted estimates of fatality rates. The authors used bootstrapping to estimate variance for the unadjusted mortality estimate. They reportedly used bootstrapping because their monitoring amounted to a census of all the turbines. However, the Big Horn turbines were arranged in rows, so I estimated the standard error of mean fatality rates among rows of wind turbines. I adjusted my estimates of fatality rate, M_A , as:

$$M_A = \frac{M_U}{p \times R \times A}, \quad \text{eq 1}$$

where M_U was unadjusted mortality expressed as number of fatalities per MW of rated capacity per year, p was the proportion of turbine-caused bird fatalities found by searchers during searcher detection trials, R was the estimated proportion of carcasses remaining since the last fatality search and estimated by a compilation of scavenger removal trials across the U.S. (Smallwood 2007), and A was the proportion of the search area that was actually searched. I calculated the standard error of the adjusted fatality rate by using the delta method to carry the error terms associated with p and R (Goodman 1960).

RESULTS

Adjusted fatality rates tallied to 446 bats, 49 raptors, and 704 birds (Table 1). My estimates were larger than those of Kronner et al. (2008) for most species groups, especially for raptors (Table 2). My estimate of raptor fatality rate was 1.6 times greater than estimated by Kronner et al. (2008). My estimates were also higher than the fatality rates predicted by WEST (2004) before the wind turbines were installed (Table 3). The estimate for the observed raptor fatality rate was 12 to 16 times greater than predicted at the project level, and nearly 1.5 times greater than predicted cumulatively in the County (by CH2MHILL 2004). The estimate for the observed American kestrel fatality rate was 13 to 17 times greater than predicted at the project level, and

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1.6 times greater than predicted cumulatively in the County. In its first year, the Big Horn project killed 16 to 21 times the predicted number of Buteo hawks, and already doubled the predicted Buteo fatality rate for the County upon build-out of wind farms. It killed at least twice the number of bats that were forecast at the project level, and most of the predicted number of bats upon build-out of wind farms in the County.

DISCUSSION

The pre-project predictions of fatality rates made by WEST (2004) and repeated in the SEPA Checklist were too low. They were inaccurate on which species would be killed. For example, northern harriers were predicted to be killed, even though they have a history of leaving wind farms once the turbines are installed and they usually fly too low to encounter the rotor planes of modern wind turbines. WEST's (2004) predictions were grossly low for raptors, missing by factors of 12, 13, and 16, depending on the species and species group. Inaccuracies of this magnitude warrant reconsideration of the approach used to make the predictions. Either the estimates from other wind farms in the northwest were themselves much lower than reality, or there was some methodological problem with the predictions.

My estimates of fatality rates at Big Horn in some cases exceeded CH2MHILL's (2004) pre-project predictions of cumulative impacts resulting from an anticipated build-out of 1,000 MW of capacity in Klickitat County. According to the SEPA Checklist, the projected build-out of 1,000 MW of wind turbines would kill about 33 raptors per year. However, extrapolating the Big Horn fatality rate to 1,000 MW would lead to a prediction of 243 raptor fatalities per year. This prediction is remarkable because the Big Horn project was located in the stratum of Klickitat County rated to be the least used of the six strata composing the County (see SEPA Checklist). This would lead one to consider a prediction of 243 raptors per year as conservative; a more realistic prediction should be a much higher fatality rate.

According to the SEPA Checklist (CH2MHILL 2004), "These additional cumulative mortalities are relatively insignificant compared to the total bird and bat populations present and represent a small increase in the overall causes of bird mortality..." This conclusion might have been considered reasonable had the impacts been anywhere close to those predicted. However, the estimates of fatality rates following post-construction monitoring suggest that at least 243 raptors will be killed annually in Klickitat County, and more than double the number of bats than were predicted. I do not know what biological impacts these fatality rates will cause, but I would not classify them as "relatively insignificant." There is probably no other human source of mortality that comes close to these levels in Klickitat County.

My estimates of fatality rates were also higher than reported by Kronner et al. (2008). The differences were likely due to Kronner et al.'s (2008) use of mean days to carcass removal in scavenger removal trials. This term can result in estimates that are biased low (Smallwood 2007). There may be additional reasons for the differences, but I cannot determine what they were. One possibility might be the estimated *effective interval* which composes part of the denominator of the equation Kronner et al. used to estimate mortality. I suspect it may have resulted in low estimates, but perhaps I did not understand this term well enough to make this conclusion. The

description of this term in Kronner et al. (2008) was vague, and I remain unclear about what it is supposed to be doing in the equation.

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Table 1. Estimates of wind turbine-caused fatality rates based on monitoring from 30 October 2006 through 29 October 2007 in the Big Horn Wind Power Project, Washington.

Species	Mean fatality rate, deaths/MW/year		Annual fatalities and 80% CI		
	Unadjusted	Adjusted	Total	LB	UB
Accipiter sp.	0.0034	0.0273	5.4	-1.7	12.6
Red-tailed hawk	0.0039	0.0055	1.1	-0.3	2.5
Ferruginous hawk	0.0068	0.0118	2.4	-0.7	5.4
American kestrel	0.0306	0.1730	34.5	4.5	64.5
Long-eared owl	0.0024	0.0035	0.7	-0.2	1.6
Short-eared owl	0.0154	0.0221	4.4	0.7	8.1
Common nighthawk	0.0068	0.0530	10.6	-4.5	25.6
Chukar	0.0323	0.1851	36.9	-14.8	88.6
Gray partridge	0.0785	0.4769	95.1	8.4	181.9
Rock pigeon	0.0190	0.0342	6.8	0.8	12.9
Mourning dove	0.0572	0.4034	80.5	1.8	159.2
Red-shafted flicker	0.0024	0.0134	2.7	-1.1	6.5
Downy woodpecker	0.0034	0.0265	5.3	-2.2	12.8
Horned lark	0.2396	1.2862	256.6	76.2	437.0
Winter wren	0.0039	0.0220	4.4	-1.6	10.4
House wren	0.0046	0.0186	3.7	-1.3	8.8
Mountain bluebird	0.0119	0.0662	13.2	-4.8	31.2
Golden-crowned kinglet	0.0150	0.0835	16.7	0.9	32.4
Ruby-crowned kinglet	0.0136	0.0652	13.0	-4.7	30.7
Thrush sp.	0.0159	0.1236	24.7	-10.4	59.7
Varied thrush	0.0024	0.0134	2.7	-1.1	6.5
Townsend's warbler	0.0116	0.0749	14.9	-5.9	35.8
Yellow warbler	0.0024	0.0185	3.7	-1.6	9.0
Western meadowlark	0.0268	0.1650	32.9	-0.5	66.4
Spotted towhee	0.0037	0.0147	2.9	-1.1	6.9
Dark-eyed junco	0.0128	0.0709	14.2	0.1	28.2
Sparrow sp.	0.0060	0.0239	4.8	-1.7	11.3
Song sparrow	0.0049	0.0273	5.4	-2.0	12.9
Passerine sp.	0.0089	0.0356	7.1	0.1	14.1
Bat sp.	0.0076	0.0306	6.1	0.1	12.1
Big brown bat	0.0024	0.0185	3.7	-1.6	9.0
Silver-haired bat	0.1490	0.8158	162.8	50.8	274.7
Hoary bat	0.2037	1.3699	273.3	77.7	468.9
All bats	0.3627	2.2349	445.9	154.5	737.2
Total raptors	0.0625	0.2432	48.5	2.3	94.7
Total birds	0.6436	3.5236	703.5	32.8	1374.3

5

Table 2. Comparison of fatality rates at Big Horn Wind Power Project during 30 October 2006 to 29 October 2007 estimated by Kronner et al. (2008) and by me.

Species group	Mean fatality rate, Deaths/MW/Year		Ratio of Smallwood to Kronner et al. estimates of fatality rate
	Kronner et al. (2008)	Smallwood	
Raptors	0.15	0.24	1.6
Doves	0.12	0.43	3.6
Galliforms	0.23	0.66	2.9
Goatsucker	0.01	0.05	5.0
Passerines	1.99	2.54	1.3
Woodpeckers	0.04	0.04	1.0
Total birds	2.54	3.52	1.4
Bats	1.90	2.23	1.2

Table 3. Ratios of observed to predicted fatality rates specific to the Big Horn Wind Power Project and cumulative among anticipated projects in Klickitat County, Washington.

Species group	Ratio of mean observed to predicted impacts	
	Project	Cumulative
Raptors	12.2 to 16.2	1.47
American kestrels	13.1 to 17.4	1.58
Large falcons, i.e. prairie falcons	0	0
Buteos	16 to 21	1.93
Eagles	0	0
Northern harriers	0	0
Passerines	1.9	No prediction
Waterfowl	0	0
Waterbirds/Shorebirds	0	0
Total birds	No prediction	2.41
Bats	2.2	0.74 to 0.95

B

From: Rick Till [REDACTED]@gorgefriends.org
Sent: Monday, May 18, 2009 5:21 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.attachments II.pdf



Friends' Scoping
Coments - Par...

Dear Mr. Fiksdal,

Please find attached a second set of attachments to Part 2 of the scoping comments of Friends of the Columbia Gorge.

Thanks for your consideration,

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

Portland, Oregon 97204-2100

(503) 241-[REDACTED]

Fax: (503) 241-[REDACTED]



State of Washington
Department of Fish and Wildlife
2108 SE Grand Blvd. Vancouver WA 98661 (360) 696-6211

June 5, 2008

Karen Witherspoon, Director
Skamania County Planning and Community Development
ATTN: Zoning Update Process
P.O. Box 790
Stevenson, WA 98648

RE: Washington Dept. of Fish and Wildlife comments on 2008 draft Skamania County zoning update

Dear Ms. Witherspoon:

Thank you for the opportunity to provide additional comments on the draft 2008 Skamania County zoning update. The Washington Department of Fish and Wildlife (WDFW) supports Skamania County's efforts to implement consistent zoning code and maps across the landscape to better protect public resources and values, including our precious fish and wildlife heritage.

Cluster development

Under the proposed zoning text changes, Skamania County proposes shifting cluster development from a conditional to an allowable use across a range of low density zones, and eliminating this provision in medium density zones. To better protect open space as well as fish and wildlife habitat, WDFW supports the use of cluster development in appropriate settings such as on the fringes of existing developed areas.

We suggest retaining cluster development as a conditional use in the residential 5 and 10 (R5 and R10), and the forest lands 20 (FL20) zones, and allowing cluster development outright in residential 1 and 2 (R1 and R2) zones. This would maintain opportunities for agency input on proper siting and design of building lots, roads, and infrastructure for cluster development on R-5 and R-10 lands, and facilitate its use on the fringes of existing developed areas.

Large-scale energy development

WDFW suggests that Skamania County reexamine the proposed use of administrative review for large-scale energy facility development on lands zoned for forestlands 20 (FL20), and the outright allowance for large-scale energy development on commercial resource lands (CRL40). These two land classifications represent the majority of

Skamania County's rural lands, with numerous critical areas and resource lands that could be impacted by such energy development.

The careful field review of applicant site development plans by WDFW staff is necessary to ensure proper mitigation and avoidance of environmental impacts. To enable such review, WDFW requests that the County consider conditional use review of large-scale energy projects to allow for greater opportunity for agency input. This approach would allow WDFW to assist developers with proper wind farm siting and development, targeting already disturbed lands and avoiding high-value or imperiled habitat areas consistent with the WDFW wind power guidelines.

WDFW would like to re-iterate our calls for a cumulative effects analysis of regional wind power development in the Columbia River Gorge. Such an analysis is typically not possible or required during permitting and siting of an individual wind power development. The County zoning update process is the best opportunity we have to conduct this analysis of potential adverse environmental impacts from development of wind power sites, as well as associated power lines, roads, and other infrastructure. Such an analysis would evaluate the number, location, and type of turbines; the number and type of species in an area; species behavior; topography; and weather factors influencing direct and indirect mortality factors.

We are pleased that the language on page 135, Section E, Large-scale Wind Energy Facilities, includes reference to WDFW Priority and Habitat Species (PHS) maps, and that there is flexibility built into facility siting ("may be adjusted") and construction ("modify construction timing and activities") to reduce the likelihood of adverse impacts to raptors.

The WDFW Wind Power Guidelines identify all of the elements on Page 136, #6, as well as provide additional information and requirements, to provide the Wind industry, the County, WDFW, and the public with a transparent and collaborative process to address impacts to natural resources from wind project development. Because the wind Power Guidelines are more comprehensive than the *draft* zoning text, we recommend that the Wind Power Guidelines be incorporated by reference into this section. Additionally, the use of these Guidelines could be listed as one of the conditions if a wind project is permitted through Skamania County.

Consistency among subareas

We found inconsistencies among the allowable, administrative, and conditional uses between similar zoning classifications in different subareas confusing and potentially conflicting. For example, cluster development is an administrative use in the Carson rural estate zone, allowable in the Swift mountain recreational 5 zone, but prohibited in the West End rural lands 5 zone. All of these zoning classifications have equivalent minimum lot sizes of 5 acres and seem appropriate areas to encourage use of cluster development. To address this and other inconsistencies, we suggest Skamania County review proposed uses across the various parallel zoning designations.

Ms. Karen Witherspoon
WDFW Comment Letter
June 5, 2008
Page 3 of 3

Thank you again for this opportunity to comment. If you have any questions, please contact us at the phone numbers or emails listed below.

Sincerely,



Ted Labbe
PHS/GMA Biologist
(360) 906-
@dfw.wa.gov



Michael Ritter
Wind Mitigation Biologist
(509) 543-
@dfw.wa.gov

Cc: Jennifer Hayes, WDFW
Travis Nelson, WDFW
Bill Weiler, WDFW
Ann Friesz, WDFW
Valerie Grigg Devis, CTED



State of Washington
Department of Fish & Wildlife
P.O. Box 213, Lyle, Washington 98635 (509) 365-0075

September 7, 2007

Curt Dreyer
Klickitat County Planning Department
Klickitat County Planning Department
208 Main St.
Goldendale, WA 98628

Dear Mr. Dreyer:

Subject: Windy Flats Wind Farm Proposal

Washington Department of Fish & Wildlife (WDFW) staff have reviewed the Windy Flats Wind Farm documents and we have numerous concerns associated with the proposal.

We formally ask Klickitat County to consider the SEPA documents as being incomplete, for a number of important issues are either not discussed or simply glossed over. We also submit that the documents do not follow the Washington Department of Fish & Wildlife Windpower Guidelines, which to our understanding, are required under Klickitat County's Energy Overlay Zone.

When Windy Flats is permitted, we believe there will be nine active wind farms in Klickitat County (with numerous additional proposals waiting in the wings). It is time for wind farm applicants to adequately address the cumulative impacts of hundreds of wind turbines developed in the same vicinity while also presenting a range of alternatives instead of only one siting plan. The only way to accomplish this thorough analysis is with the requirement of an Environmental Impact Statement. WDFW has asked for a regional approach to wind power for 15 years without success.

Thank you for your consideration. Specific comments follow this page.

Bill Weiler
WDFW Habitat Biologist

Cc: Tim Rymer
David Anderson
Curt Leigh
Kurt Humphrey
Michael Greene, USFWS

WDFW Response to the Windy Flats Proposal

Process

WDFW is disappointed that only preliminary field review meeting occurred with the applicant and WDFW staff. There was no opportunity to review written plans prior to public distribution. There has been no opportunity to negotiate mitigation measures. There was no opportunity for the public to review proposed turbine locations on site or to view the wind farm area. WDFW strongly recommends a careful and thorough pre-application process in order to ensure that public resources will be adequately protected.

Siting

WDFW has asked that turbines be placed 300 feet back from cliff edges due to the use of those areas by raptors and other species. It is our understanding that turbines will be placed well within the 300 foot buffer. The 17 known raptor nests were not mentioned regarding their influence on turbine sitings. The many maps showing flight paths of "large birds" were not overlaid against the proposed turbine strings and there was no description/narrative on how these species will be impacted when turbines are placed within their flight paths. We question why a proposed road servicing turbine string 126-135A is allowed within a stream corridor? There is no narrative describing how far turbines will be sited from WDFW priority habitat Oregon white oak stands.

We strongly recommend a 300-foot buffer due to the variety of avian species utilizing oak woodlands.

Re-vegetation

There was no specific information on restoration of the disturbed areas impacted by construction. (page 98) There were no timelines mentioned, no specifics on what kind of seed/plants will be used, and no mention of native species, which we consider a requirement.

Avian Surveys

As has been the norm, the consultant conducted either one season of surveys or one year of surveys---the document states both. We strongly disagree with the comparison of avian data from surveys in other distant locales, especially when the consultant did not use avian survey information from the only operational wind farm in Klickitat County, PPM's Bighorn facility. It is absolutely non-credible to continually make references to the Altamont wind farm in California. Avian surveys have little purpose unless they are tied to the wind farm planning, ie. keeping proposed turbines away from nesting, roosting, foraging, and flight path areas. The WEST study did absolutely no analysis regarding turbine siting.

There is mention of a raptor survey, but no specific dates or times are mentioned. We also do not know when long-billed curlew surveys will occur? There is no statement regarding western gray squirrel surveys despite the revelation that Oregon white oak stands will be impacted.

Post-construction fatality monitoring

The Windy Flat documents say little about post-construction fatality monitoring except that it will occur for "one year" after the project is operational. Will all turbines be surveyed during every season?

Avian Impacts

In all previous WEST reports regarding avian impacts, the authors stated that "raptor use is highest on lands west of highway 97." Lo and behold, for the Windy Flats report for the first wind farm to be located west of highway 97, now we learn that raptor use is more "evenly distributed" and that the authors were incorrect in their previous assessments. There is no evidence supporting this assumption. National Audubon Society of Washington designated the Columbia Hills as its "Important Bird Area" due in part to the confirmed high numbers of raptors.

Again, we find the information presented in the Wind Flats SEPA documents to be unacceptable and urge that the planning process be re-opened until a thorough environmental analysis is developed.

Bhavnani, Monica (CTED)

Scoping Comment
LATE #375

From: [REDACTED]@comcast.net
Sent: Monday, May 18, 2009 7:23 PM
To: CTED EFSEC
Cc: Sam Merrill; Susan Markey; shawnc@seattleaudubon.org
Subject: Whistling Ridge Energy Project Comments of The Black Hills Audubon Society
Attachments: BHAS COMMENTS.WHISTLING RIDGE PROJECT.doc

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

Dear Mr. Fiksdal:

Attached please find the comments of the Black Hills Audubon Society.

Thank you for your consideration.

Sincerely,

Donna J. Nickerson
BHAS

CC: Sam Merrill

Shawn Cantrell

Susan Markey



Black Hills Audubon Society

A Washington State Chapter of the National Audubon Society

(360) 352-██████████ www.blackhills-audubon.org

██████████ Olympia, WA 98507

Black Hills Audubon Society is a volunteer, non-profit group whose 1,100 members in Thurston, Mason, and Lewis Counties are concerned about wildlife, their habitats, and natural history.

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

18 May, 2009

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

Dear Mr. Fiksdal:

On behalf of the Black Hills Audubon Society (BHAS), which represents approximately 1100 members in Thurston, Lewis, and Mason Counties, we concur with the comments of Seattle Audubon on the above project.

As does Seattle Audubon, BHAS supports the development of well-designed, appropriately-sited renewable energy projects in Washington State, and to that end, the comments you have received from Seattle Audubon are well reasoned to ensure that objective.

Thank you for the opportunity to comment at this early stage and we expect to provide further comment during the duration of the environmental review process. If you have any questions, please do not hesitate to contact me.

Sincerely,

Donna J. Nickerson
Conservation Chair, BHAS
██████████@comcast.net

Cc: Sam Merrill, BHAS President
Shawn Cantrell, Seattle Audubon

Bhavnani, Monica (CTED)

From: Alison Bryan [REDACTED]@gorge.net]
Sent: Monday, May 18, 2009 9:16 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.

Alison Bryan

[REDACTED]
Hood River, OR 97031

541-387-[REDACTED]

Bhavnani, Monica (CTED)

From: Sheila Dooley [REDACTED]@yahoo.com]
Sent: Monday, May 18, 2009 10:04 PM
To: CTED EFSEC
Subject: Whistling Ridge

We are opposed to the plan to place wind turbines adjacent to the National Scenic Area. The visual effect from key viewing areas from the east is not acceptable. This also a flyway for migratory birds including endangered species. This project would result in a large number of bird and bat kills.

What is the overriding need to place the turbines in this location when there are many other windy locations that do not involve these issues?
It's location, location, location.

Sincerely,

Sheila Dooley and Phil Swaim

[REDACTED]
The Dalles, Oregon 97058

Bhavnani, Monica (CTED)

From: Vicki Roberts [REDACTED]@intel.com]
Sent: Tuesday, May 19, 2009 8:48 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.

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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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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.

Vicki Roberts



Mosier, OR 97040

541-370-

Bhavnani, Monica (CTED)

From: Judy West [REDACTED]@wadeca.org]
Sent: Tuesday, May 19, 2009 9:28 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.

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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. We come every May to hike the pristine trails in the CRG. Let's not mar this beautiful area!

Judy West


Seattle, WA 98105

Bhavnani, Monica (CTED)

From: Jerryann [REDACTED]@gorge.net]
Sent: Tuesday, May 19, 2009 9:49 AM
To: CTED EFSEC
Subject: windmills

Dear Sirs:

About elec. generating windmills, I lived in Calif. when they first started testing and using them. I think it is a great idea and I like the beauty of the gentle giants. All the hubub about birds, noise, etc is way out of control , usually by people who have never been around them.

I do also realize that if the SDS and Stevenson faction has anything to do with it , it will be only to their good, they are not good guardians of anything.(this may be a little harsh).

Thankyou for listening to the public. I have no illusions it does any good because we do not pour \$\$\$ into anyones pockets.

Yours Truely,
Jerryann Devlin

From: Henderson, Mary [REDACTED]@Williams.com]
Sent: Tuesday, May 19, 2009 10:19 AM
To: CTED EFSEC
Subject: Whistling Ridge Energy Project

Attachments: Dev_Handbook.pdf



Dev_Handbook.pdf
(3 MB)

I received the notice for the public meeting late, but wanted to reply anyway. We have a high pressure natural gas transmission line located in the gorge in the area where they plan to put the wind turbines.

I am attaching a developers handbook for further plans if near our gas easements.

Let me know if there is anyone I need to contact or have them contact me if there are any conflicts.

Mary Henderson
Northwest Pipeline, GP
Land Representative

[REDACTED]
Battle Ground, WA 98604

360-666-[REDACTED] office

503-807-[REDACTED] cell

360-687-[REDACTED] fax

[REDACTED]@Williams.com



Williams Gas Pipeline

Developers' Handbook



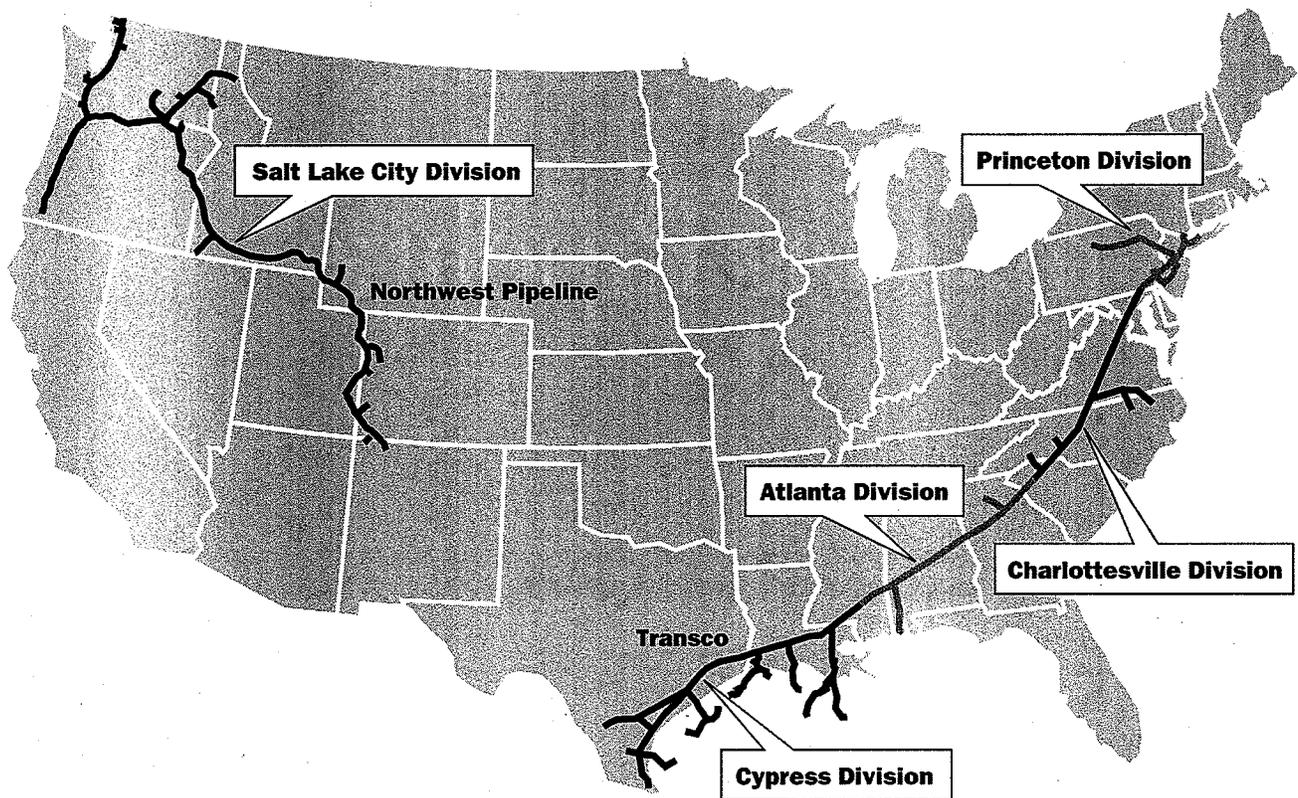
I. Introduction

TO ALL HANDBOOK USERS:

This handbook outlines the minimum standards and procedures to be followed when planning land use development on or near Williams Gas Pipeline rights of way. The handbook is intended for use by city and county/parish planners, engineers, developers, land surveyors, and anyone involved in the initial stages of land development. If Williams Gas Pipeline is included in the initial planning stages, project delays can be avoided and safe development practices in the vicinity of pipelines can be attained.

The handbook is designed to make you aware of the most common standards and procedures Williams typically requires to protect its facilities in areas of changing land use. Each proposed development or activity, however, requires a case specific evaluation by a qualified Williams representative.

Please become familiar with the contents of this handbook. If you have further questions or need assistance, please contact your local Williams Gas Pipeline office listed below.



WILLIAMS GAS PIPELINE
Division Offices

Transco

Princeton Division

99 Farber Road
Princeton, NJ 08540
(609) 936-2400

Charlottesville Division

345 Green Brier Drive
Charlottesville, VA 22901
(804) 973-4384

Atlanta Division

1600 Executive Drive South
Duluth, GA 30096
(678) 284-4600

Cypress Division

12501 Veterans Memorial
Houston, TX 77014
(281) 895-5300

Northwest Pipeline

Salt Lake City Division

295 Chipeta Way
Salt Lake City, Utah 84108
(801) 583-8800

II. Safety and Reliability

Safety

Williams is committed to ensuring the safe operation of its natural gas pipeline systems. According to the federal Department of Transportation, the transmission of natural gas through interstate pipelines is the safest means of transportation in the United States. The industry enjoys an excellent safety and reliability record. Williams Gas Pipeline has a thorough damage prevention policy to prevent pipeline failures. Damage by outside force from a third party is the leading cause of pipeline failures.

Reliability

Williams Gas Pipeline is committed to reliable delivery of gas transportation services. Communities, factories, hospitals, power plants, businesses, and residences depend on our product and services for energy to generate heat and electricity.

Williams Gas Pipeline must and will use every available resource to ensure the safety and reliability of its facilities. Williams Gas Pipeline does not encourage or support any development or encroachment that interferes with the operation or maintenance of its pipelines. In those cases where development or encroachment cannot be avoided, we seek your help to ensure the safety and reliability of our facilities through proper planning and coordination with a Williams Gas Pipeline representative. As a responsible developer, contractor, or other party engaged in any ground disturbing activity near pipeline facilities, we urge you to read and understand the guidelines presented in this publication.

III. Pipeline Facilities Overview

Williams Gas Pipeline's transmission operation includes high-pressure steel pipelines ranging in diameter from 2" to 48", storage facilities, compressor stations, meter stations, cathodic protection equipment, valve settings, and other facilities.

In accordance with federal regulations, Williams Gas Pipeline identifies the location of its pipeline facilities by installing permanent pipeline markers, like the ones shown on the following page, near road, rail, water, fence, and underground utility crossings. Pipeline markers may also be strategically placed in extensive areas of open ground to delineate the location of the pipeline.

The maintenance of pipeline markers and an open, clear right of way at all times is critical to public safety. Construction or development near transmission pipelines increases the probability of excavation damage. It is the responsibility of Williams Gas Pipeline, individual landowners, and contractors to ensure that all temporary and permanent pipeline markers installed by Williams Gas Pipeline are protected and maintained at all times, especially during construction. Removing or defacing a pipeline marker is a federal criminal offense.

IV. Williams Gas Pipeline Right-of-Way Agreements

A. Description

Most of Williams Gas Pipeline's existing pipeline easements and rights were acquired through agreements granting Williams Gas Pipeline the right to construct, operate, maintain, repair, modify, alter, protect, change the size of, remove, replace and access a pipeline or pipelines within its easement. The easement and rights are conveyed with the land in successive purchases and generally allow the current landowner the right to use and enjoy the surface of the easement, as long as that use does not interfere or conflict with Williams Gas Pipeline's rights.

B. Width

When the original pipeline routes were selected, agricultural, forested or rural environments were deliberately chosen whenever possible. In most cases, the original right-of-way agreement did not specify a defined right-of-way width or location on

the lands covered by the agreement, and therefore included large sections of land.

Where defined, Williams Gas Pipeline's rights of way vary in width from 10 to 200 feet, depending on the number and diameter of the pipeline(s), terrain, and terms of the right-of-way agreement.

C. Amendments or Modifications

As the rural environment is altered and land developments are proposed, Williams Gas Pipeline, at the request of the landowner, may elect to amend or modify the right-of-way agreement to reflect the changing land use. Williams Gas Pipeline can work with developers to incorporate the right of way into the project design, including consent to use the right of way as a "greenway" or open space area, so long as that use does not interfere with Williams Gas Pipeline's ability to construct, operate and maintain its facilities.

V. Legislation

A. Federal

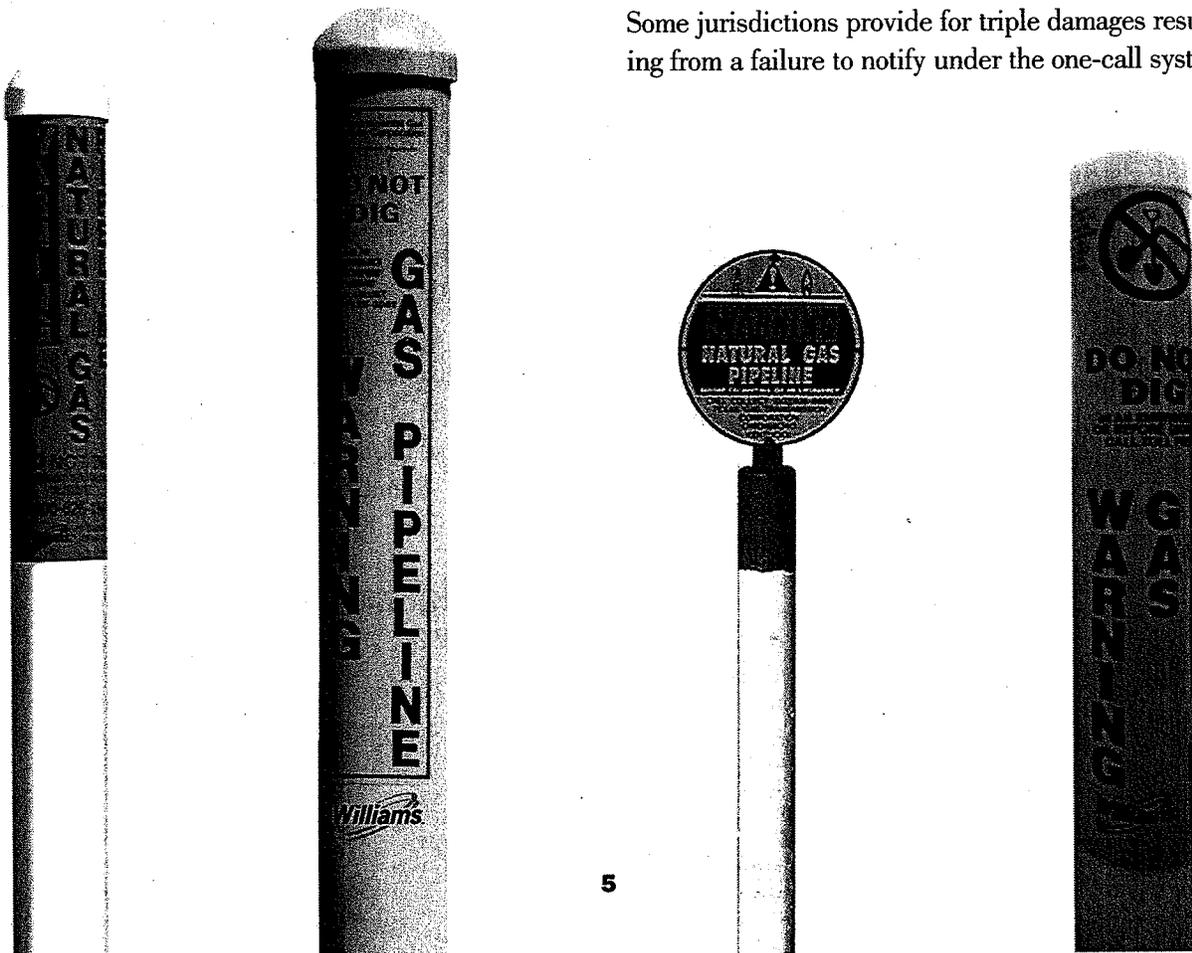
Williams Gas Pipeline is regulated by the Department of Transportation, Office of Pipeline Safety. The pipeline safety regulations are administered through Title 49, Code of Federal Regulations, Part 192.

Part 192 prescribes minimum standards for the safe operation of pipelines. The more dense the population, the more stringent the standards for pipeline design, maximum allowable operating pressure, frequency and type of patrols, and leak surveys.

B. State

All of the states in which Williams Gas Pipeline operates have damage prevention laws for the protection of pipelines and other underground utilities. Most states require excavators to notify their local one-call system of their excavation plans. Williams Gas Pipeline participates in all one-call systems, which coordinate notice of excavation to participating industries.

Some jurisdictions provide for triple damages resulting from a failure to notify under the one-call system.



C. City & County/Parish

Local governments often play a major role in regulating land use by means of comprehensive planning and zoning. Some counties/parishes currently offer developer incentives to encourage easement use for parks and open space purposes. In most cases, Williams Gas Pipeline supports this initiative for the joint use of the easement area.

Some counties/parishes require an additional building setback from the pipeline easement. Please check local codes before submitting lot layout plans.

VI. Encroachments

It is Williams Gas Pipeline's philosophy to prevent encroachments, when possible, by working with agencies and developers to design projects outside the pipeline easement. The majority of Williams Gas Pipeline's easement agreements prohibit encroachments, and you should be aware that Williams Gas Pipeline will enforce applicable provisions in its easement agreements where it believes the continued safe operation and maintenance of the pipeline could be threatened.

Where Williams Gas Pipeline determines that an activity can be undertaken without jeopardy to the pipeline system, Williams Gas Pipeline will require a specific Encroachment Agreement, issue an Encroachment Permit, or issue a Letter of no objection, depending on the type and scope of activity proposed.

The encroachment agreement will contain all pertinent conditions to be followed by the encroaching party for the planned activity and may also provide for cost reimbursement to Williams Gas Pipeline. Typically, Williams Gas Pipeline will seek reimbursement for projects that require significant design review, engineering investigation, field inspections, legal consultation or facility modification.

The encroachment permit will contain all pertinent conditions to be followed by the encroaching party for the activity planned and is generally reviewed

and issued to the encroaching party on-site. A sample encroachment permit is included on pages 14 - 15 in this publication.

Specific Encroachment Agreement

When is a "Specific Encroachment Agreement" required?

A Specific Encroachment Agreement is required when:

- Activities/works cross under or over the natural gas pipeline.
- Activities/works extend into the right of way.

Examples of such activities/works may include, but are not limited to:

- street and road crossings
- ornamental fencing
- blasting or use of explosives in the vicinity of Williams Gas Pipeline facilities
- heavy equipment crossings
- large diameter utility crossings
- permanent facilities associated with adjacent commercial or residential developments.

Other activities subject to an Encroachment Agreement are determined on a case-by-case basis.

In addition, third party activities/works that necessitate Williams Gas Pipeline facility modifications (such as, but not limited to, pipeline casing extensions, pipeline relocations or replacements, and pipeline cathodic protection facility modifications) are addressed in the Encroachment Agreement. Reimbursement provisions may also be referenced in the Encroachment Agreement.

Who initiates the "Specific Encroachment Agreement"?

A Williams Gas Pipeline representative generally initiates the Specific Encroachment Agreement. The

agreement must be executed before work begins on the right of way. In the event work commences absent such an agreement, Williams Gas Pipeline may take steps to prevent further activity.

Reimbursement Agreement

When is a "Reimbursement Agreement" required?

A Reimbursement Agreement is typically required for activities/works proposed on the right of way which require extensive preliminary engineering and/or field inspection services by Williams Gas Pipeline personnel.

In addition, Williams Gas Pipeline will seek a Reimbursement Agreement for any third-party activities/works that require modification to Williams Gas Pipeline facilities.

Who initiates the "Reimbursement Agreement"?

The agreement is initiated by a representative of Williams Gas Pipeline and must be executed before any work, preliminary engineering, or field inspection services are performed by Williams Gas Pipeline.

Encroachment Permit

When is an "Encroachment Permit" required?

An Encroachment Permit is required when:

- Activities/works cross under or over the natural gas pipeline.
- Activities/works extend into the right of way.

Examples of such activities/works may include:

- residential water lines
- residential television cable
- small diameter drainage or sewer lines
- residential electrical lines
- fences (livestock or typical residential)
- residential sprinkler systems, etc.

Who initiates the "Encroachment Permit"?

The agreement is initiated by a local representative of Williams Gas Pipeline and must be executed before work begins on the right of way.

VII. Notification and Construction Safety Requirements

A. Notification

In order to prevent unnecessary delays, Williams Gas Pipeline encourages close communication with our representatives throughout your entire project. We will be happy to attend pre-construction meetings and provide a safety/informational presentation to any interested parties, including contractors, local government maintenance crews, and developers. Please refer to page 3 for your specific regional contact number.

All of the states in which Williams Gas Pipeline operates (*see pages 16 - 17*) have "one-call" laws, which require the excavators to provide 48 to 72 hours notice, depending on local requirements, before any excavating commences. Your local one-call system will notify all participating utilities in the area of your planned excavation activities and is a simple, yet very effective, means of reducing dig-ins.

A Williams Gas Pipeline representative must be onsite, following 48 to 72 hours prior notice, for all surface and subsurface activities within the pipeline right of way. Any crossings made without a Williams Gas Pipeline inspector on site will have to be re-excavated at the excavator's expense to provide Williams Gas Pipeline an opportunity to inspect all affected pipeline facilities.

Protect yourself, utility companies, and the public. Call before you dig.

Federal regulations (OSHA 29CFR Ch. XVII-1926.651) also require excavators to notify underground utilities prior to the start of actual excavation.

Your state regulations may be more specific, but in any case, failure to notify underground utility operators of excavation activities could lead to a citation.

Williams' pipelines often operate at high pressures. To ensure the safety and reliability of our facilities and the public, we require a Williams Gas Pipeline representative to be on site while you work around our pipelines. Please contact your local Williams Gas Pipeline office before work commences on, or in close proximity to, a Williams Gas Pipeline right of way. A Williams Gas Pipeline representative will be on site to inspect the work and monitor the site until construction is completed.

B. Safety Requirements

Excavations must be barricaded to protect pedestrians and vehicles. Proper access into the trench must be provided. Excavations must be properly sloped or shored, as required to comply with state and Federal OSHA requirements.

Stockpiling brush, trash, or other debris on the easement is prohibited, as it may conceal pipeline markers and hinder pipeline inspections or routine maintenance. Contact your local Williams Gas Pipeline district office concerning burning restrictions.

VIII. Plan Design and Review Requirements

A. Ideal Subdivision Layout

In an ideal subdivision layout:

- The entire easement width is reserved as an open space trail.
- Easement identity is clear and easily marked.
- Crews can undertake emergency repairs quickly.
- Fewer landowners are affected by the easement, which reduces the chance of a "dig in."
- Routine maintenance and inspections are not hindered.

When the proposed development plans call for the dedication of the street/road right of way to the city, county/parish, or state, it is important to note that Williams Gas Pipeline's easement is superior to this action and its rights are not diminished. The agency involved may require you to obtain an amended easement.

Drawing of pipeline easement in subdivision



B. Subdivision Plans

- Williams Gas Pipeline requires a minimum of 30 business days' lead-time to review preliminary plans for impacts to the easement and to insure that all proposed improvements are designed in accordance with Williams Gas Pipeline's Encroachment Specifications (see pages 10-13).
- An open space trail, free of trees and other deep-rooted plants, is the ideal easement use. This reduces the public exposure by minimizing the opportunity for "dig-ins." When this is not possible, lot division on either boundary of the easement is preferable to splitting the easement between lots. A lot division configured on top of the pipeline causes lot loss to the public because no fences can be built directly over the pipeline. Construction, maintenance and routine inspections can be disruptive to the landowner when the easement is split between lots.
- An Encroachment Agreement (formal agreement) is usually executed between Williams Gas Pipeline and the developer/landowner to cover the new land use.
- Williams Gas Pipeline representatives will work with your surveyor(s) and will stake the location of our pipeline facilities.

C. Street & Road Crossing Plans

- Williams Gas Pipeline requires a minimum of 30 business days to review proposed road-crossing plans. Additional review time will be necessary for proposed divided highways, interstate highways and other road construction projects which require pipeline modifications.
- Provide a scope of work, description, and plan and profile drawings with your plans. Profiles are required to show depth of cover over each Williams pipeline (existing and finished grade) and the clearance between Williams pipeline and any associated utilities.
- Please include a location map showing the project site area, including sufficient geographical references such as legal property lines, roads, and appropriate deed information to the properties impacted.
- When new rights of way are acquired or dedicated, the costs for pipeline modifications will generally be borne by the developer, state, county/parish, or city highway department.
- Williams Gas Pipeline must be given the opportunity to make a pipeline inspection prior to the start of road construction.

Aerial view of ideal easement in developed area



IX. Encroachment Specifications

The following Williams Gas Pipeline specifications are minimum requirements for most proposed encroachments to maintain safety and reliability of the pipelines and to avoid conflicts with federal department of transportation regulations and existing right-of-way agreements. Additional requirements may be imposed, depending upon the scope of the proposed encroachment and surrounding environment. For a review of your individual situation, please contact your local Williams Gas Pipeline office.

A. General Requirements for Surface Alterations

- “One-Call” systems require 48 to 72 hours notice prior to excavation activities. Check your local requirements. Notification is the Law!
 - No aboveground structures or appurtenances are to be located within the Williams Gas Pipeline right of way.
 - An authorized Williams Gas Pipeline representative must be on site prior to and during any surface-disturbing work performed within the right of way. Williams Gas Pipeline’s representative will assist you in determining the location of the pipeline, the right-of-way width, and existing cover over the pipeline.
 - No cut or fill on the right of way is permitted without Williams Gas Pipeline’s approval. Williams Gas Pipeline may require submittal of plan and profile drawings for prior review and approval. All drawings must show, in detail, any nearby Williams Gas Pipeline facilities and other features that will allow Williams Gas Pipeline to determine the effects of the proposed construction or maintenance activity on its facilities.
 - Williams Gas Pipeline will request evidence of general liability and other appropriate and usual insurance prior to any activity and/or construction on or near Williams Gas Pipeline rights of way. In the event of excavation under Williams pipelines, the applicable Williams pipeline must be named as additional insured. Any rights of subrogation or recovery will be waived in favor of Williams Gas Pipeline. The insurance limits, terms and conditions that may be required will be dependent on the specific facilities potentially impacted and what would be usually and prudently obtained in similar industry situations.
- All foreign lines crossing Williams Gas Pipeline’s right of way shall be installed in accordance with all applicable codes and requirements governing such installations.
 - All foreign lines shall cross Williams Gas Pipeline’s right of way at an angle as close to 90 degrees as possible. No horizontal or vertical beds will be permitted in Williams’ right of way. Parallel occupancy of Williams Gas Pipeline’s right of way shall not be permitted.
 - Our pipelines are electrically protected against corrosion. At Williams Gas Pipeline’s request, metallic foreign lines that enter or cross our right of way must have test leads installed. In addition, Williams Gas Pipeline personnel must be provided an opportunity to install test leads on Williams Gas Pipeline’s existing pipelines. All necessary measures (coatings, electrical bonds, etc.) shall be taken to ensure that the proposed pipe or utility is adequately protected from potential interference.
 - All foreign lines crossing Williams’ pipelines or related facilities shall be installed with a minimum of 24 inches of clearance between the existing Williams pipeline facilities and the proposed foreign line. The foreign line shall be installed at a uniform depth across the full width of the Williams Gas Pipeline right of way. Williams Gas Pipeline may require that foreign lines be installed under its existing pipeline(s) and related facilities.
 - Williams Gas Pipeline may require that foreign lines be identified with permanent aboveground markers where the lines enter and exit Williams Gas Pipeline’s right of way. It is the foreign line owner’s responsibility to obtain any rights to install

the markers, and to maintain the markers. A directional warning tape should be placed 12-18 inches above the foreign line and extend across the entire width of Williams Gas Pipeline's right of way.

- In some cases, there is significant delay between the review of developers' plans and actual construction. If delays occur, all construction and maintenance activities are subject to Williams Gas Pipeline's requirements in effect at the time the work actually takes place. Developers are required to notify Williams Gas Pipeline of any changes to plans that would affect previous approval.

B. Fences

- Fence posts shall not be installed within four feet of any Williams pipeline. Williams Gas Pipeline may require that fence posts installed within its right of way be hand dug.
- Williams Gas Pipeline shall have the free right of ingress and egress. Williams Gas Pipeline may require that new fences have a 12-foot wide gate installed within the right of way at a location approved by Williams Gas Pipeline.

C. Landscape Guidelines

- No trees or large, deep-rooted shrubs are permitted on the right of way. It has been consistently demonstrated that tree roots can disturb the coating on a pipeline, which could lead to corrosion.
- With prior approval from Williams Gas Pipeline, some types of shrubs may be permitted on the right of way provided the plantings do not interfere with the operation, maintenance, and inspection of the pipeline and related facilities. Under no circumstances will mechanical equipment be allowed for planting of shrubs on the right of way.
- Williams Gas Pipeline reserves the right to cut and/or remove plantings on its right of way as required in the operation, inspection and maintenance of its pipeline facilities; further, Williams Gas Pipeline assumes no responsibility

for any cost involved in the replacement of removed landscape plantings.

- All sprinkler or irrigation systems will require review by a Williams Gas Pipeline representative. Sprinkler heads will not be permitted within 10 feet of any pipeline. All crossings of the pipeline with feeder lines must be hand dug.
- Williams Gas Pipeline may require that a recorded Encroachment Agreement be executed by all parties prior to any landscaping.

D. Streets, Roads and Driveways

- Williams must complete a preliminary engineering review for all roads, streets, driveways, etc. proposed on the right of way. Any pipe casing, concrete slabs, or other protection required by Williams Gas Pipeline shall be installed at no expense to Williams Gas Pipeline. Williams Gas Pipeline will require a pipeline inspection prior to construction.
- Access to the earth above the pipeline must be maintained for leak detection and cathodic protection surveys.
- The recommended minimum cover over Williams Gas Pipeline's existing pipelines is 66 inches at all driveways, highways, roads, streets, etc. The recommended minimum cover over Williams Gas Pipeline's existing pipelines in adjacent burrow ditches is 48 inches.
- Driveways, highways, roads, streets, etc. crossing Williams pipeline facilities shall cross at an angle as close to 90 degrees as possible. All crossings must be over straight pipe and at locations free of any crossovers. Parallel occupancy of the right of way shall not be permitted.
- Williams Gas Pipeline may require a recorded Encroachment Agreement. Williams Gas Pipeline will retain the right to cut all present and proposed driveways, highways, roads, streets, etc. and will have no responsibility for restoration, loss of use or access, or any other costs.

E. Temporary Equipment Crossings

To protect Williams Gas Pipeline's pipeline from external loading, Williams Gas Pipeline must perform an engineering evaluation to determine the effects of any proposed equipment use. Mats, timber bridges, or other protective materials deemed necessary by Williams Gas Pipeline shall be placed over Williams Gas Pipeline facilities for the duration of any loading. Protective materials shall be purchased, placed, and removed at no cost to Williams Gas Pipeline. The right of way must be restored to its original condition.

Williams Gas Pipeline may require markings to identify specific areas where equipment use is authorized. Vibratory equipment is not permitted on the right of way.

F. Drainage, Impoundment of Water and Erosion Control

- Williams Gas Pipeline may conduct preliminary engineering studies for any proposed drainage channels or ditches within the right of way. Drainage channels or ditches must be adequately protected from erosion and provide a minimum of 48 inches of cover over the pipeline(s). Altering (clearing, re-grading or changing alignment of) an existing drainage channel or ditch requires approval from Williams Gas Pipeline.
- Impoundment of water on the right of way is not permitted. Soil erosion control measures shall not be installed within the right of way without prior Williams Gas Pipeline approval.

G. Excavations and Blasting

- Plans for excavation on the right of way require prior approval by Williams Gas Pipeline. No machine excavation shall be performed within 24 inches of Williams' pipeline(s). Williams Gas Pipeline's on site representative may require hand digging at a distance greater than 24 inches.
- When a backhoe is used, the bucket teeth should be curled under each time the bucket is brought

back into the ditch to reduce the chance of the teeth contacting the pipeline. A bar should be welded across the teeth and side cutters removed from the bucket.

- Prior to any plowing or ripping of soil on the right of way, particularly in association with agricultural activities, your plans should be reviewed with your local Williams Gas Pipeline representative to ensure that proper cover exists.
- Williams Gas Pipeline may require an engineering evaluation of all excavation activities which necessitate unsupported pipeline spans 10 feet in length or greater.
- Williams Gas Pipeline may require that a detailed blasting plan be submitted for review and authorization prior to any proposed blasting within a minimum distance of 200 feet of Williams pipeline facilities. If deemed necessary by Williams Gas Pipeline, the blasting contractor may be required to perform seismic monitoring.

H. Buried Communication (Telephone, TV, Data Transmission, Fiber Optic) and Buried Power Line Crossings

- All buried communications (other than single residential telephone and cable TV) crossing Williams Gas Pipeline facilities shall be installed in rigid casing (minimum of Schedule 40) for the full width of the right of way.
- All buried electric cables, except 24-volt DC power lines (including single residential service drops), crossing Williams Gas Pipeline facilities shall be installed in rigid casing (minimum of Schedule 40) for the full width of the right of way.
- All buried single residential telephone, cable TV and 24-volt DC power lines shall be encased in plastic conduit for the full width of the right of way.
- Williams Gas Pipeline may require additional protection, including concrete encasement or concrete caps when deemed necessary.

I. Sanitary Sewer and Water Crossings

All sewer and water lines shall be either (1) ductile iron or steel pipe (adequately protected from Williams Gas Pipeline cathodic protection system), or (2) plastic pipe installed in rigid casing (minimum of Schedule 40) for the full width of the right of way. No piping connections will be allowed within five feet of any Williams pipeline.

J. Combustible Material Lines

- All plastic combustible material lines shall be installed in rigid casing (minimum of Schedule 40) for the full width of the right of way.
- Williams Gas Pipeline may require that steel combustible material lines (adequately protected from Williams Gas Pipeline cathodic protection system) be installed under the existing Williams Gas Pipeline pipeline facilities. In addition, Williams Gas Pipeline may require additional protection for steel combustible material lines, including concrete encasement or concrete caps.

K. Bored Crossings

- Williams Gas Pipeline's existing pipeline facilities shall be test pitted to verify the location of the pipe prior to any proposed boring operations. Williams Gas Pipeline may require submittal of both plan and profile drawings for appropriate review prior to any proposed boring operations.
- Williams Gas Pipeline may require rigid casing (minimum of Schedule 40) for all bored crossings.
- Prior to any boring, inspection holes will be excavated to verify the depth of the bore as it approaches each pipeline. The contractor shall provide and maintain instrumentation to accurately locate the boring head.

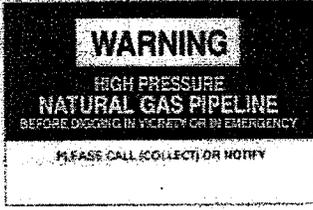
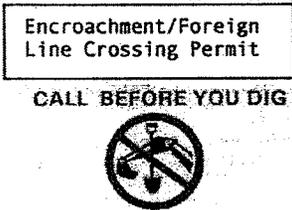
L. Overhead Line Crossings

- Overhead line crossings shall be installed with a minimum of 30 feet of vertical clearance above the WGP right-of-way to provide adequate equipment clearance. No poles or appurtenances shall be located on the Williams Gas Pipeline right of way.
- Overhead line crossings shall not be installed within 25 feet (measured horizontally) of any gas vent (e.g. relief valve, blow-down vent).
- Overhead lines shall cross at an angle as close to 90 degrees as possible. Parallel occupancy of the Williams Gas Pipeline right of way will not be permitted.

M. Disposal Systems

No septic tanks, liquid disposal systems, or hazardous waste disposal systems will be allowed on the right of way or within 25 feet of Williams Gas Pipeline facilities. This prohibition includes, but is not limited to, facilities that have the potential of discharging effluent from sewage disposal systems, the discharge of any hydrocarbon substance, the discharge or disposal of any regulated waste, or any other discharge that may prove damaging or corrosive to Williams Gas Pipeline facilities or harmful to Williams employees if encountered.

WILLIAMS GAS PIPELINE "WGP"
ENCROACHMENT/FOREIGN LINE CROSSING PERMIT



Permit No.
Revision Date
One Call Report No.

This Encroachment/Foreign Line Crossing Permit is made and entered into on the date indicated below, by and between the encroaching party ("PERMITTEE") and ("COMPANY") for the purpose of allowing PERMITTEE to construct or maintain an encroachment and/or foreign line crossing on COMPANY's right-of-way or facilities. Facilities shall include, but not be limited to, fee properties, easements, pipelines, meter buildings, and valve sites.

Encroaching Party "PERMITTEE":		WGP Entity Name "COMPANY":	
Name:	COMPANY Representative:		
Address:	Address:		
Phone:	Phone:		
Landowner's Name:	Division/District:	Phone:	COLLECT CALLS ACCEPTED

ENCROACHMENT/FOREIGN LINE CROSSING LOCATION

Line/Tract No.	Parcel Name/ID	Latitude	Longitude	
Section	Township	Range	County/Parish	State
Alignment Sheet/Map No.	Mile Post	Engineering Stations	ROW Width/Config.	
Type of Encroachment/Foreign Line Crossing				
<input type="checkbox"/> 3rd Party Crossing <input type="checkbox"/> Landowner Activity <input type="checkbox"/> New Development <input type="checkbox"/> Other				

ENCROACHMENT/FOREIGN LINE CROSSING DESCRIPTION

Attach Company's Foreign Line Sketch to this Permit as Exhibit "A", illustrating encroachment or foreign line crossing. If applicable, insert additional conditions not reflected in this Permit as Exhibit "B". Both Exhibits shall become a part hereof. Brief Description of encroachment/foreign line crossing:

--

YOUR LOCAL ONE CALL NUMBER IS _____

If damage to COMPANY's facilities is a result of negligence by the encroaching party's (PERMITTEE's) failure to adhere to the state "CALL BEFORE YOU DIG" law, COMPANY will pursue restitution to the full extent of the law.

This permit is granted subject to the terms, requirements, and conditions shown below and strictly in accordance with specifications shown on the reverse side of this Permit form.

- It is understood that the PERMITTEE will cause the encroachment and/or foreign line crossing at no expense to COMPANY. PERMITTEE agrees to supply COMPANY plans and drawings, in detail, illustrating the proposed encroachment and/or foreign line crossing and COMPANY's facilities, unless COMPANY elects not to require such plans.
- So that COMPANY may schedule its personnel — and not delay PERMITTEE's work, PERMITTEE agrees to notify "COMPANY" 48-72 hours before any work commences on or near its right-of-way or Facilities.
- This Permit does not change or modify any provisions of COMPANY's existing right-of-way contracts or easements, unless such easements are required to be amended as a result of PERMITTEE's encroachment and/or foreign line crossing. PERMITTEE acknowledges that the granting of this Permit may require amendment of the existing right-of-way contract or easement to reflect a change in land use or land rights.
- This Permit shall be revocable in the event of noncompliance of any terms, requirements, conditions, and specifications of this Permit upon written notice given to PERMITTEE and/or current owner of record.
- PERMITTEE agrees to save harmless COMPANY, its officers, agents, employees and its subcontractors and their officers, agents and employees from any and all claims for damages, injury or death resulting from the continuation and maintenance of said encroachment and/or foreign line crossing. A COMPANY representative must be present during all construction activities that may impact the pipeline facilities. PERMITTEE shall be liable for all costs incurred for any damages.
- PERMITTEE agrees that COMPANY may remove any encroachment and/or foreign line crossing, or portion thereof, if in Company's judgment it is reasonably necessary to do so in order to construct, alter, maintain, repair or replace gas transmission facilities located within the right-of-way and easement. Should COMPANY remove any such encroachments, foreign line crossings, or portions thereof, COMPANY will not be liable to PERMITTEE, or its successors or assigns for any damages resulting by reason of such removal, except for those damages arising out of the sole negligence of COMPANY.
- COMPANY will request evidence of general liability and other appropriate and usual insurance prior to any activity and/or construction on or near Company rights-of-way. In the event of excavation under COMPANY pipelines, the applicable COMPANY pipeline must be named as additional insured. Any rights of subrogation or recovery will be waived in favor of WGP. The insurance limits, terms and conditions that may be required will be dependent on the specific facilities potentially impacted and what would be usually and prudently obtained in similar industry situations.

PERMITTEE

On this _____ day of _____ 20____, I acknowledge that I have received, and reviewed with a "COMPANY" representative the requirements, conditions and specifications of this Permit. I also understand the provision and prescribed penalties as provided under the law regarding excavation.

By: _____
 Title: _____

COMPANY _____
 By _____
 Title _____

WILLIAMS GAS PIPELINE "WGP" ENCROACHMENT/FOREIGN LINE CROSSING PERMIT

ENCROACHMENT/FOREIGN LINE CROSSING SPECIFICATIONS

The following COMPANY specifications are minimum requirements for most proposed encroachments to maintain safety and reliability of the pipelines and to avoid conflicts with federal department of transportation regulations and existing right of way agreements and easement rights. Additional requirements may be imposed depending upon the scope of the proposed encroachment. For a review of your individual situation, please contact your local COMPANY office.

GENERAL REQUIREMENTS FOR SURFACE ALTERATIONS

"ONE CALL" SYSTEMS REQUIRE 48-72 HOURS NOTICE PRIOR TO EXCAVATION ACTIVITIES. CHECK YOUR LOCAL REQUIREMENTS. NOTIFICATION IS THE LAW!

1. No above ground structures or appurtenances are to be located within COMPANY's right-of-way.
2. An authorized COMPANY representative must be on site prior to and during any surface disturbing work performed within the right-of-way. COMPANY's representative will assist you in determining the location of the pipeline, the right-of-way width and existing cover over the pipeline.
3. No cut or fill on the right-of-way is permitted without COMPANY approval.
4. COMPANY may require submittal of plan and profile drawings for prior review and approval by COMPANY. All drawings must show, in detail, all of COMPANY facilities and other features that will allow COMPANY to determine the effects of the proposed construction or maintenance activity on its facilities.
5. COMPANY will request evidence of general liability and other appropriate and usual insurance prior to any activity and/or construction on or near COMPANY right-of-way. In the event of excavation under COMPANY pipelines, the applicable COMPANY pipeline must be named as additional insured. Any rights of subrogation or recovery will be waived in favor of WGP. The insurance limits, terms and conditions that may be required will be dependent on the specific facilities potentially impacted and what would be usually and prudently obtained in similar industry situations.
6. All foreign lines crossing COMPANY's right-of-way shall be installed in accordance with all applicable codes and requirements governing such installations.
7. All foreign lines shall cross COMPANY's right-of-way at an angle as close to 90 degrees as possible. Parallel occupancy of COMPANY's right-of-way shall not be permitted.
8. COMPANY pipelines are electrically protected against corrosion. At COMPANY's request, metallic foreign lines that enter or cross COMPANY right-of-way must have test leads installed. In addition, COMPANY personnel must be provided an opportunity to install test leads on COMPANY existing pipelines. All necessary measures (coatings, electrical bonds, etc.) shall be taken to ensure that the proposed pipe or utility is adequately protected from potential interference.
9. All foreign lines crossing COMPANY pipeline or related facilities shall be installed with a minimum of (24) inches of clearance between the existing COMPANY pipeline facilities and the proposed foreign line. The foreign line shall be installed at a uniform depth across the full width of the COMPANY right-of-way. COMPANY may require any foreign lines be installed under its existing pipeline(s) and related facilities.
10. COMPANY may require that foreign lines be identified with permanent aboveground markers where the lines enter and exit COMPANY right-of-way. It is the line owner's responsibility to obtain any rights to install the markers, and to maintain the markers. A direct-burial warning tape should be placed 12-18 inches above the foreign line and extend across the entire width of COMPANY right-of-way.

FENCES

1. Fence posts shall not be installed within (4) feet of any COMPANY pipeline. COMPANY may require that fence posts installed within its right-of-way be hand dug.
2. COMPANY shall have the free right of ingress and egress. COMPANY may require that new fences have a 12-foot wide gate installed within the right-of-way at a location approved by COMPANY.

LANDSCAPE GUIDELINES

1. No trees or large, deep-rooted shrubs are permitted on the right-of-way.
2. With prior approval from COMPANY, some types of shrubs may be permitted on the right-of-way provided the plantings do not interfere with the operation, maintenance, and inspection of the pipeline and related facilities. Under no circumstances will mechanical equipment be all for planting of shrubs on the right-of-way.
3. COMPANY reserves the right to cut and/or remove plantings on the COMPANY right-of-way as required in the operation, inspection and maintenance of its pipeline facilities; further, COMPANY assumes no responsibility for any cost involved in the replacement of said cut and/or removed landscape plantings.
4. All sprinkler or irrigation systems will require review by a COMPANY representative. Sprinkler heads will not be permitted within 10 feet of any pipeline. All crossings of the pipeline with leader lines must be hand dug.
5. COMPANY may require a recorded Encroachment Agreement. The Encroachment Agreement shall be executed by all parties prior to any landscaping.

STREETS, ROADS AND DRIVEWAYS

1. COMPANY must complete a preliminary engineering review for all roads, streets, driveways, etc., proposed on the right-of-way. Any pipe casing, concrete slabs, or other protection required by COMPANY shall be installed at no expense to COMPANY. COMPANY may require a pipeline inspection prior to construction.
2. The recommended minimum cover over COMPANY existing pipelines is (68) inches at all driveways, highways, roads, streets, etc. The recommended minimum cover over COMPANY existing pipelines in adjacent borrow ditches is (48) inches.
3. Driveways, highways, roads, streets, etc. crossing COMPANY pipeline facilities shall cross at an angle as close to 90 degrees as possible. All crossings must be over straight pipe and at locations free of any crossovers. Parallel occupancy of the right-of-way shall not be permitted.
4. COMPANY may require a recordable Encroachment Agreement. COMPANY will retain the right to cut off present and proposed driveways, highways, roads, streets, etc. and will have no responsibility for restoration, loss of use or access, or any other costs.

TEMPORARY EQUIPMENT CROSSINGS

1. To protect COMPANY's pipeline from external loading, COMPANY must perform an engineering evaluation to determine the effects of any proposed equipment use. Mats, timber bridges, or other protective materials deemed necessary by COMPANY shall be placed over COMPANY facilities for the duration of any loading. Protective materials shall be purchased, placed, and removed at no cost to COMPANY. The right-of-way must be restored to its original condition.
2. COMPANY may require markings to identify specific areas where equipment use is authorized. Vibratory equipment is not permitted on the right-of-way.

DRAINAGE, IMPOUNDMENT OF WATER AND EROSION CONTROL

1. COMPANY may conduct preliminary engineering studies for any proposed drainage channels or ditches within the right-of-way. Drainage channels or ditches must be adequately protected from erosion and provide a minimum of 48-inches of cover over the pipeline(s). Altering (cleaning, re-grading or changing alignment of) an existing drainage channel or ditch requires approval from COMPANY.
2. Impoundment of water on the right-of-way is not permitted. Soil erosion control measures shall not be installed within the right-of-way without COMPANY approval.

EXCAVATIONS AND BLASTING

1. Plans for excavation on the ROW require prior approval by COMPANY. No machine excavation shall be performed within (24) inches of COMPANY's pipeline(s). COMPANY's onsite representative may require hand digging at a distance greater than 24-inches.
2. When a backhoe is used, the bucket teeth should be cued under each time the bucket is brought back into the ditch to reduce the chance of the teeth contacting the pipeline. Where possible, a bar should be welded across the teeth and side cutters should be removed from the bucket.
3. Prior to any plowing or ripping of soil on the right-of-way, particularly in association with agricultural activities, your plans should be reviewed with your local WGP representative to ensure that proper cover exists.
4. COMPANY may require engineering evaluation of all excavation activities which necessitate unsupported pipeline spans 10 feet in length or greater.
5. COMPANY may require that a detailed blasting plan be submitted for review and authorization prior to any proposed blasting within the vicinity of COMPANY pipeline facilities. If deemed necessary by COMPANY, the blasting contractor may be required to perform seismic monitoring.

BURIED COMMUNICATION (TELEPHONE, TV, DATA TRANSMISSION, FIBER OPTIC) AND BURIED POWER LINE CROSSINGS

1. All buried communications (other than single residential telephone and cable TV) crossing COMPANY facilities shall be installed in rigid casing (minimum of Schedule 40) for the full width of the right-of-way.
2. All buried electric cables except 24 volt DC power lines (including single residential service drops) crossing COMPANY facilities shall be installed in steel casing (minimum of Schedule 40) for the full width of the right-of-way.
3. All buried single residential telephone, cable TV and 24 volt DC power lines shall be encased in plastic conduit for the full width of the right-of-way.
4. COMPANY may require additional protection including concrete encasement or concrete caps.

SANITARY SEWER AND WATER CROSSINGS

1. All sewer and water lines shall be either (1) ductile iron or steel pipe (adequately protected from COMPANY cathodic protection system) or (2) plastic pipe installed in rigid casing (minimum of Schedule 40) for the full width of the right-of-way. No piping connections will be allowed within 5' of any COMPANY pipeline.

COMBUSTIBLE MATERIAL LINES

1. All plastic combustible material lines shall be installed in rigid casing (minimum of Schedule 40) for the full width of the right-of-way.
2. COMPANY may require that steel combustible material lines (adequately protected from COMPANY cathodic protection system) be installed under the existing COMPANY pipeline facilities. In addition, COMPANY may require additional protection for steel combustible material lines including concrete encasement or concrete caps.

BORED CROSSINGS

1. COMPANY existing pipeline facilities shall be test pitted (soil evaluation) prior to any proposed boring operations. COMPANY may require submittal of both plan and profile drawings for appropriate review prior to any proposed boring operations.
2. COMPANY may require steel casing (minimum of Schedule 40) for all bores.
3. Prior to any boring, inspection holes will be excavated to verify the depth of the bore as it approaches each pipeline. The contractor shall provide and maintain instrumentation to accurately locate the boring head.

OVERHEAD LINE CROSSINGS

1. Overhead line crossings shall be installed with a minimum of (30) feet of vertical clearance above the COMPANY ROW to provide adequate equipment clearance. No poles or appurtenances shall be located on the COMPANY right-of-way.
2. Overhead line crossings shall not be installed within (25) feet (measured horizontally) of any gas vent (e.g. relief valve, blow-down vent).
3. Overhead lines shall cross at an angle as close to 90 degrees as possible. Parallel occupancy of the COMPANY right-of-way will not be permitted.

DISPOSAL SYSTEMS

1. No septic tanks, liquid disposal systems, or hazardous waste disposal systems will be allowed on the right-of-way or within (25) feet of company facilities. This prohibition includes, but is not limited to, facilities that have the potential of discharging effluent from sewage disposal systems, the discharge of any hydrocarbon substance, the discharge or disposal of any regulated waste, or any other discharge that may prove damaging or corrosive to Company facilities.
REMEMBER. CALL BEFORE YOU DIG.

Remember, Call Before You Dig.

ALABAMA

Alabama One-Call
(800) 292-8525 or (205) 252-4444

COLORADO

Utility Notification Center of Colorado
(800) 922-1987 or (800) 833-9417

GEORGIA

Utilities Protection Center, Inc.
(800) 282-7411 or (770) 623-4344

IDAHO

Dig Line
(800) 342-1585 or (208) 342-1585

Palouse Empire Underground Coordinating
Council (800) 822-1974

Pass Word
(800) 428-4950 or (208) 667-7491

Utilities Underground Location Center
(800) 424-5555

One-Call Concepts – Idaho
(800) 626-4950 or (800) 822-1974

Shoshone County One-Call
(800) 398-3285 or (208) 667-7491

LOUISIANA

Louisiana One-Call System, Inc.
(800) 272-3020

MARYLAND

Miss Utility of Delmarva
(800) 282-8555 or (800) 441-8355

Miss Utility
(800) 257-7777

MISSISSIPPI

Mississippi One-Call System, Inc.
(800) 227-6477 or (601) 362-4374

NEW YORK

Underground Facility Protection
Organization
(800) 962-7962 or (315) 437-7333

New York City/Long Island
One-Call Center (800) 272-4480

NORTH CAROLINA

North Carolina One-Call Center
(800) 632-4949 or (336) 855-7799

OREGON

Oregon Utility Notification Center
(800) 332-2344 or (503) 246-6699

PENNSYLVANIA

Pennsylvania One-Call System, Inc.
(800) 242-1776 or (412) 464-7100

SOUTH CAROLINA

Palmetto Utility Protection Service
(800) 922-0983 or (803) 939-1117

TEXAS

Lone Star Notification Center
(800) 669-8344 or (713) 223-4567

Texas Excavation Safety System
(800) 344-8377

Texas One-Call System
(800) 245-4545 or (412) 415-5000

UTAH

Blue Stakes Location Center
(800) 662-4111 or (801) 532-5000

VIRGINIA

Miss Utility of Virginia
(800) 552-7001

Miss Utility
(800) 257-7777

Miss Utility of Delmarva
(800) 441-8355

WASHINGTON

Washington Utilities Notification Center
(800) 332-2344 or (360) 696-4848

Grays Harbor & Pacific County Utility
Coordinating Council (360) 532-3550

Utilities Underground Location Center
(800) 424-5555

Chelan-Douglas Utility Coordinating
Council
(509) 663-6111

Northwest Utility Notification Center
(800) 553-4344 or (360) 696-4848

Inland Empire Utility Coordinating Council
(509) 456-8000

Utilities Council of Cowlitz County
(360) 425-2506 or (800) 424-5555

Palouse Empire Utility Coordinating
Council
(800) 822-1974

WYOMING

Wyoming One-Call
(800) 348-1030

Call Before You Dig of Wyoming
(800) 849-2476 or (307) 266-5661

Utilities Underground Location Center
(800) 454-5555

Bhavnani, Monica (CTED)

From: Lisa Hargrave [REDACTED]@philhargrave.net]
Sent: Tuesday, May 19, 2009 11:05 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.

I support the building of green energy projects and multiple uses of our natural resources, but this project is not compatible with the other, higher uses of the Columbia River Gorge.

The proposed turbines would be visible night and day from many scenic viewpoints, permanently and irreparably damaging the National Scenic Area which is a major source of both economic activity and recreation.

There are many places to locate wind turbines but only one Gorge. Much of the area economy is dependent on the tourism that is generated by the pristine beauty of the National Scenic Area. To destroy that beauty is to damage a major component of the regional economy. The returns from the energy project could never replace the lost revenues to other Gorge business and communities. The proposal simply does not make economic sense.

Finally, the proposed project would involve heavy road construction within the National Scenic Area. The use of Scenic Area lands for industrial purposes is prohibited by the National Scenic Area Act and Management Plan.

The proposed project is in direct contradiction of the purpose of the Columbia River Gorge National Scenic Area and therefore should be denied.

Lisa Hargrave
[REDACTED]
Hood River, OR 97031

541-386-[REDACTED]

Scoping Comment
LATE #383

Bhavnani, Monica (CTED)

From: Sharon McCormack [REDACTED]@gmail.com]
Sent: Tuesday, May 19, 2009 12:46 PM
To: CTED EFSEC
Subject: Re: Windmills

Hello,

Please add this map to my email regarding the VAST SIZE of our county. It shows the STUPIDITY of putting windmills in the middle of the WRONG place.

There is A LOT MORE WIND, NO PEOPLE, NO TREES in the vast eastern portion of the county.

KLICKATAT COUNTY WASHINGTON



***PINK DOT SHOWS TOURIST AREA

also the most populated area that has gotten all the publicity as the "best place to live" in USA.

Hello,

I am a firm believer in renewable power; Always have been.

ARE YOU CRAZY?

Have you even seen a MAP of Klickitat County???

5/19/2009

Can you see the VAST AMOUNT OF **EMPTY SPACE** to the east of our very populated and highly treasured tourist/scenic area? Maybe you should take a drive!!!

Don't you see the reason this area has become more popular (expensive/desirable) is **BECAUSE OF THE NATURAL BEAUTY?????**

MY PROPERTY TAXES DOUBLED, because of this scenic beauty. Values will certainly be lessened as a result, I.E. TAX dollars will be lessened. Tourism will be lessened.

There is an **ENORMOUS** amount of empty space in the east of the county, windmills are **GREAT** out there; **PLUS** there is **MORE WIND OUT THERE!**

No trees need cutting, there **ARE** no trees there.

PLEASE, TAKE A LOOK AT THE MAP OF THE COUNTY! Crazy that you are even considering this.

Sharon McCormack

Sharon McCormack

White Salmon WA 98672

Hm: 509-493-

Cell: 541-490-

@gmail.com

www.

Bhavnani, Monica (CTED)

From: Planet Glassberg [REDACTED]@yahoo.com]
Sent: Tuesday, May 19, 2009 2:29 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.

Planet Glassberg



Eugene, OR 97440

From: Lisa Provost [redacted]@pacifier.com]
Sent: Tuesday, May 19, 2009 2:33 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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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 Provost

[REDACTED]
Vancouver, WA 98683

360-828-[REDACTED]

Bhavnani, Monica (CTED)

From: BPA Public Involvement [REDACTED]
Sent: Tuesday, May 19, 2009 2:35 PM
To: 'Nathan Baker'; Fiksdal, Allen (CTED)
Cc: CTED EFSEC; BPA Public Involvement; Montano, Andrew M - KEC-4; Marvin, Bruce (ATG); Rick Till; Gary Kahn
Subject: RE: Whistling Ridge Energy Project - Friends' Scoping Comments - Part 1

Your comment with all its attachments have been posted under one comment.

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

From: Nathan Baker [mailto:[REDACTED]@gorgefriends.org]
Sent: Monday, May 18, 2009 4:06 PM
To: Fiksdal, Allen (CTED)
Cc: efsec@CTED.WA.GOV; BPA Public Involvement; Montano, Andrew M - KEC-4; 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]

Bhavnani, Monica (CTED)

From: Forrest Jones [REDACTED]@gorge.net]
Sent: Tuesday, May 19, 2009 3:10 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.

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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.

Forrest Jones


hood river, OR 97031

Scoping Comment
LATE #388

Bhavnani, Monica (CTED)

From: Eric bokovoy [REDACTED]@msn.com]
Sent: Tuesday, May 19, 2009 7:40 PM
To: CTED EFSEC
Subject: Save the Scenic Area from "Whistling Ridge Energy"

For the past few decades the Columbia Gorge Commision has been telling people what kind of things they can build inside the Scenic Area so as to protect the "view shed" of the National Scenic area. In fact they even tell us what color our roofs can be in many areas. If roof color of a home or small commercial property is that important, how can we overlook the disasterous impact of a 400'+ tall wind turbine just a few feet outside the boundary. With so many other places to develop this kind of energy please don't allow the "Whistling Ridge Energy Project" to spew out all the "visual pollution" it will undeniably create.

Thanks for considering,

Eric & Mary Bokovoy
[REDACTED]
Hood River, Or 97031

Insert movie times and more without leaving Hotmail®. [See how.](#)

Bhavnani, Monica (CTED)

From: Jeff Horne [REDACTED]@yahoo.com]
Sent: Tuesday, May 19, 2009 8:01 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.

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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.

Jeff Horne


Portland, OR 97202

Bhavnani, Monica (CTED)

From: Adam Kauffman [REDACTED@gmail.com]
Sent: Tuesday, May 19, 2009 10:50 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.

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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.

Adam Kauffman


Portland, OR 97206

Bhavnani, Monica (CTED)

From: Brooke Jacobson [redacted]@comcast.net]
Sent: Wednesday, May 20, 2009 9:42 AM
To: CTED EFSEC
Subject: Whistling Ridge needs critical look

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

Dear Mr. Fiksdal, ,

It appears to me that the proposed Whistling Ridge Energy Project in Skamania County, Washington needs significantly more study and discussion.

In particular, the potential negative impacts on sensitive wildlife and plant habitat have not been fully assessed. We are only beginning to understand the effects of this technology and we need to find ways of using it the do not undermine our efforts to preserve both the scenic and habitat areas so vital to our region as the Columbia River Gorge.

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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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.

Brooke Jacobson


Portland, OR 97212

Bhavnani, Monica (CTED)

From: Judy Anderson [REDACTED]@aol.com
Sent: Wednesday, May 20, 2009 1:04 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, ,

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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.

Judy Anderson


Cottage Grove, OR 97424



United States
Department of
Agriculture

Forest
Service

Columbia River Gorge
National Scenic Area

LATE Scoping Comment
#397

902 Wasco Ave., Suite 200
Hood River, OR 97031
541-308-1700
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File Code: 2370

Date: May 19, 2009

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

Dear Mr. Fiksal:

Since submitting my letter of May 6, 2009 regarding the Whistling Ridge Energy Project questions concerning my intent have surfaced that I believe need addressed.

First and foremost, I want to reiterate the fact that the National Scenic Act does not provide any statutory authority to me as the Federal Area Manager to regulate activities outside the boundary of the National Scenic Area. The Act specifically addresses this under Section 17 (a) (10) Savings Provisions which states: *Nothing in this Act shall... (10) establish protective perimeters or buffer zones around the scenic area or each special management area. The fact that activities or uses inconsistent with the management directives for the scenic area or special management areas can be seen or heard from these areas shall not, of itself, preclude such activities or uses up to the boundaries of the scenic area or special management areas.*

Having said this, I also want to emphasize that as the Federal Manager for the National Scenic Area I have the responsibility to provide input regarding potential effects outside activities may have within the NSA. In this case potential scenic impacts associated with the siting of wind turbines. My May 6, 2009 letter was submitted with the intent that I am asking that your office include in its analysis of effects those potential scenic effects as viewed from within the National Scenic Area and to the extent that you may do so consider means by which to minimize those effects.

Thank you for providing me the original opportunity to comment and for providing this clarification.

Sincerely,

DANIEL T. HARKENRIDER
Area Manager

RECEIVED

MAY 22 2009

ENERGY FACILITY SITE
EVALUATION COUNCIL



Bhavnani, Monica (CTED)

From: Tom Wehrley [REDACTED]@yahoo.com]
Sent: Wednesday, May 20, 2009 7:51 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.

Tom Wehrley

[REDACTED]
Portland, OR 97211

503-284-[REDACTED]

Bhavnani, Monica (CTED)

From: Ron Martin [REDACTED]@mtu.edu
Sent: Thursday, May 21, 2009 1:07 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, ,

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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.

Ron Martin



Hood River, OR 97031

541-386-

Bhavnani, Monica (CTED)

From: Douglas Hanes [REDACTED@earthlink.net]
Sent: Monday, May 25, 2009 10:44 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

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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.

Douglas Hanes



Portland, OR 97214