

Appendix E
Agency Consultations

Appendix E-1
DAHP Concurrence on Area of Potential Effects
Applicant APE



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501

Mailing address: PO Box 48343 • Olympia, Washington 98504-8343

(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

February 1, 2010

Mr. James La Spina
Siting Specialist
Energy Facility Site Evaluation Council
905 Plum Street, Building 3
P.O. Box 43172
Olympia, WA 98504-3172

In future correspondence please refer to:

Log: 012610-17-EFSEC

Property: *Consultation for Area of Potential Effects Whistling Ridge Energy Project, Skamania County, Washington*

Re: Area of Potential Effects-Concurrence and Comments

Dear Mr. La Spina:

We have reviewed the material you forwarded to our office that describes the area of potential effect (APE) for the Whistling Ridge Wind Energy Project in Skamania County. We concur with the definition of the APE. We look forward to receiving any correspondence or comments from the concerned Tribes or other parties and the cultural resources survey report when it is available.

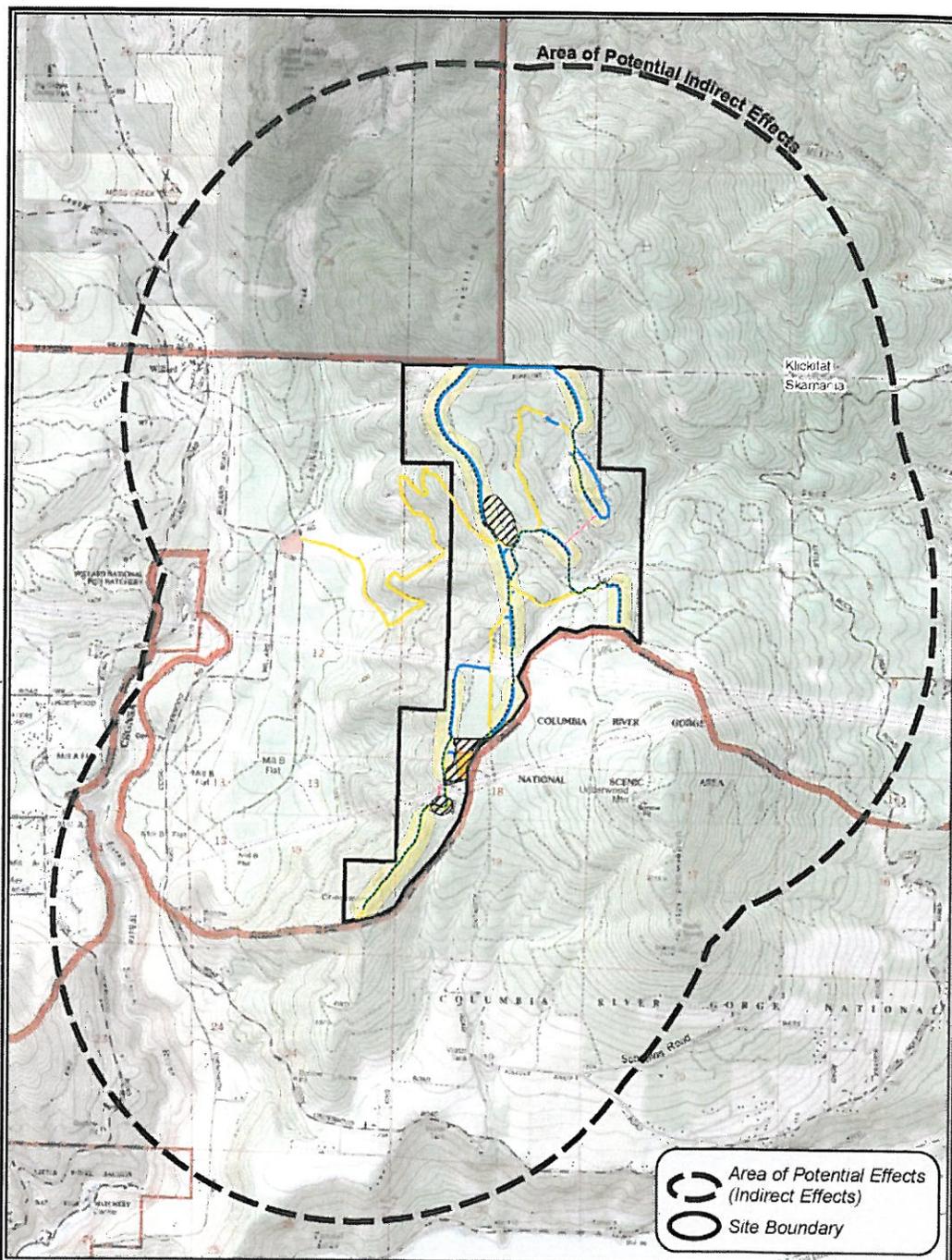
These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer. Thank you for your consultation. If you have any questions, please feel free to contact me.

Sincerely,

Gretchen Kaehler
Assistant State Archaeologist
(360) 586-3088
gretchen.kaehler@dahp.wa.gov

CC. Katy Chaney, URS Corporation
Jessica Lally, Wind Farm Archaeologist, Yakama Nation





- Area of Potential Effects**
- 650' Turbine Corridor
 - Approximate Location of 5 Acre Laydown Staging Areas
 - Overhead Power Line
 - Buried Collector Lines - Turbines to Substation
 - 5 Acre Substation Plot
 - 5 Acre Operations and Maintenance Facility Alternative Locations
 - Improved Existing Roads
 - New Project Roads

Area of Potential Effects (Indirect Effects)
 Site Boundary

Figure 1
Area of Potential Effects
Whistling Ridge Energy Project

N

0 0.5 1
Miles

Appendix E-2
BPA Section 106 Consultation Letters



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2010

In reply refer to: KEC-4

Mr. Rob Whitlam, Ph.D.
State Archaeologist
Department of Archaeology & Historic Preservation
1063 South Capitol Way, Suite 106
Olympia WA 98501

Certified Mail
Return Receipt Requested
7009-2820-0002-3433-0256

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Dr. Whitlam:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your agency – the Washington State Office of Archeology and Historic Preservation. BPA also initiated consultation with The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Nez Perce Tribe of Idaho, and The Confederated Tribes and Bands of the Yakama Reservation, and The Columbia River Inter-Tribal Fish Commission (CRITFC) pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effect (APE) for the proposed project has been determined and is located on the attached APE Map. Additionally, a project overview map is also being included to depict the total project area of the proposed wind facility and that of BPA's proposed action. The project will be located in T3N, R10E, Sections 7 and 18 (Northwestern Lake Quadrangle). The APE is briefly described below.

The proposed project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line. The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well

as access roads running underneath the additional transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

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In this initiation of consultation, BPA seeks your concurrence on the proposed undertaking and APE discussed above. We also seek any information that you might have on known archaeological resources in the project area. Based on the interest of time, we anticipate your immediate response to this consultation.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or email me at ammontano@bpa.gov.

Sincerely,

/s/ Andrew M. Montaña, Aug. 2, 2010

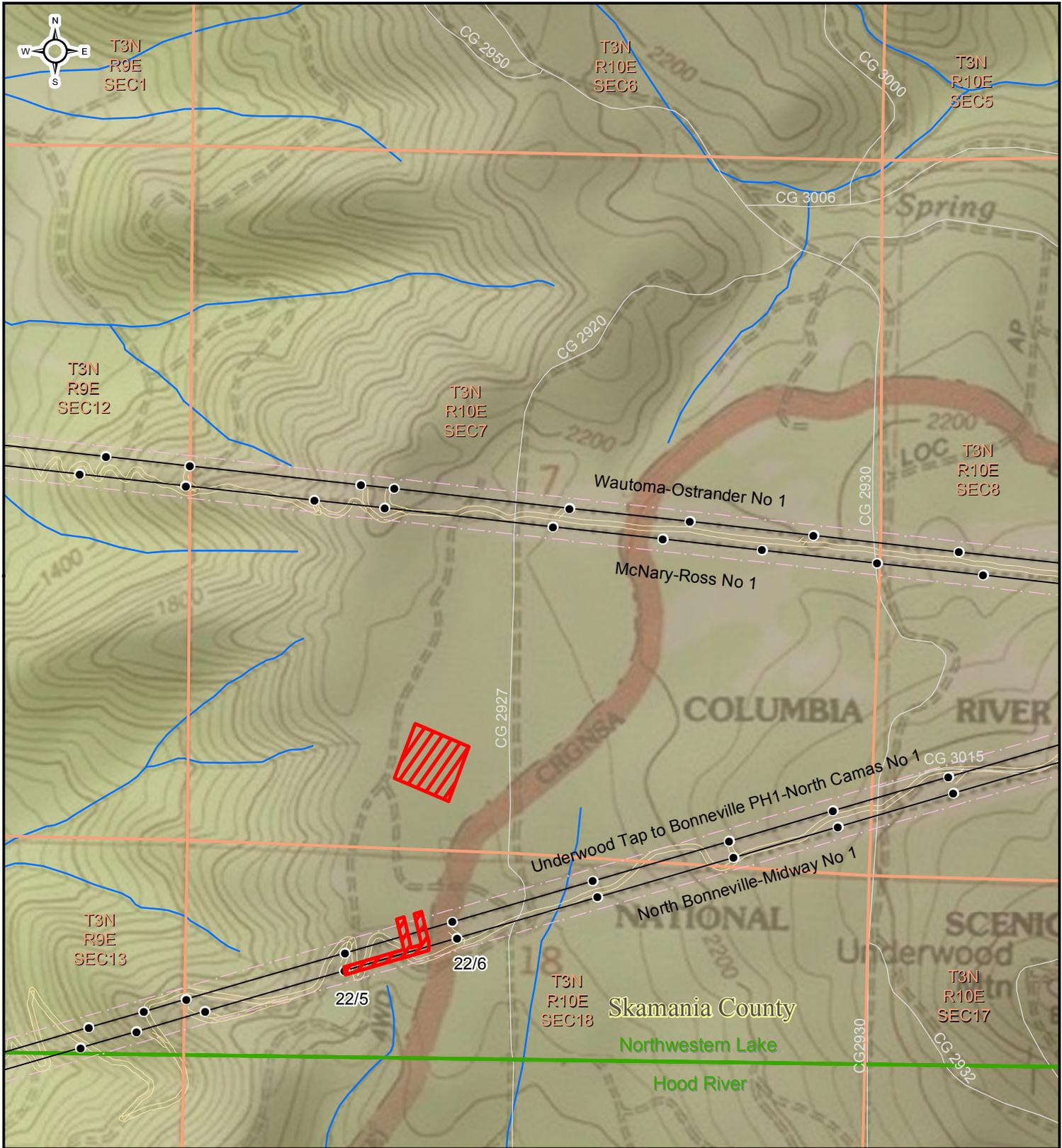
Andrew M. Montaña

Environmental Protection Specialist

Enclosures:

APE Map

Project Overview Map



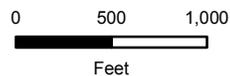
Proposed BPA Substation - Whistling Ridge Energy Project
 Area of Potential Effects

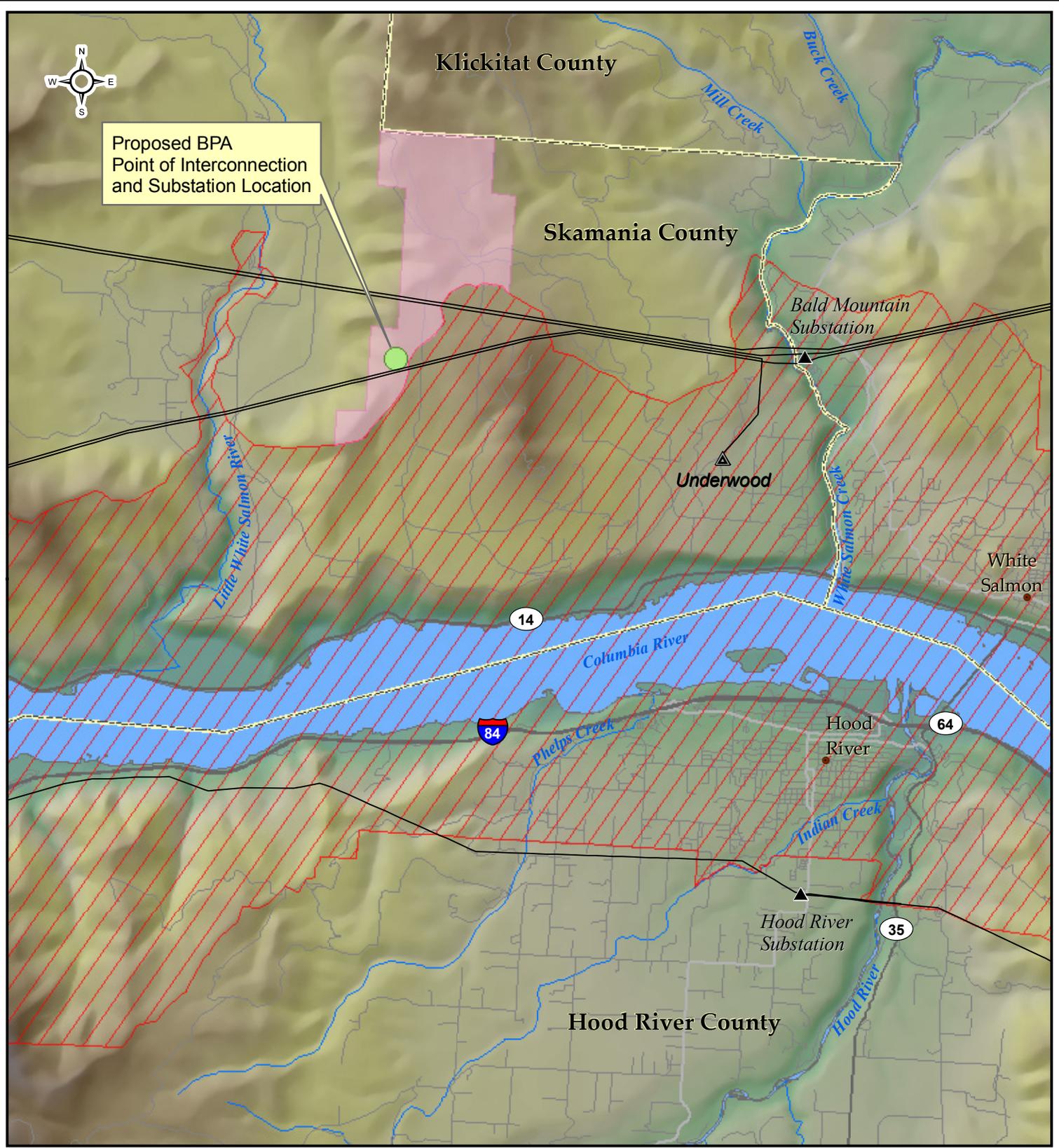


-  Area of Potential Effect
-  Quad Name & Boundary
-  Township/Range/Section
-  BPA Right-of-Way Corridors
-  BPA Towers
-  Access Roads
-  BPA Transmission Lines



June 28, 2010





Proposed BPA
Point of Interconnection
and Substation Location

Proposed Whistling Ridge Energy Project

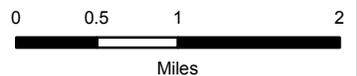
Project Overview



- Proposed BPA Point of Interconnection and Substation Location
- Whistling Ridge Energy Project Study Area
- Columbia River Gorge National Scenic Area
- County Boundary
- BPA Substation
- Foreign Owned Substation
- BPA Transmission Lines



May 5, 2010





STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

August 9, 2010

Mr. Andrew M. Montano
Environment, Fish & Wildlife
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208-3621

Re: Whistling Ridge Substation Project
Log No.: 080910-26-BPA

Dear Mr. Montano;

Thank you for contacting our department. We have reviewed the materials you provided for the Area of Potential Effect (APE) for the proposed Whistling Ridge Energy Project Substation Project near Underwood, Skamania, County, Washington.

We concur with your determination of the Area of Potential Effect (APE) as described and presented in your figures and text.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.). Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and we look forward to receiving the results of the professional archaeological survey report, your consultation efforts, and your Determination of Effect.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov

cc: K. Cannell



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

December 10, 2010

In reply refer to: KEC-4

William Iyall, Chairman
Cowlitz Indian Tribe
PO Box 2547
Longview, WA 98632

Certified Mail
Return Receipt Requested
7010-1060-0000-5012-9336

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Iyall:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Office of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Confederated Tribes and Bands of the Yakama Reservation, The Nez Perce Tribe of Idaho, and The Columbia River Inter-Tribal Fish Commission (CRITFC) pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effect (APE) for the proposed project has been determined and is located on the attached APE Map. Additionally, a project overview map is also being included to depict the total project area of the proposed wind facility and that of BPA's proposed action. The project will be located in T3N, R10E, Sections 7 and 18 (Northwestern Lake Quadrangle). The APE is briefly described below.

The proposed project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line. The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built.

This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

Upon receipt of comments from your office concerning the proposed project and APE, BPA will determine the appropriate action for the identification and protection of historic properties within the APE. This may include tribal input for Traditional Cultural Properties, if indicated as an area of concern for yours or any of the other contacted tribes. A field survey covering the entire APE shown on the enclosed map is planned to be conducted. Furthermore, the identification, evaluation, and mitigation activities will be conducted by an individual meeting the Secretary of the Interior' standards. Following the background research and field survey, a technical report will be prepared and submitted to your office and to any affected tribes.

In this initiation of consultation, BPA seeks your concurrence on the proposed undertaking and APE discussed above. We also seek any information that you might have on known archaeological resources in the project area. Based on the interest of time, we anticipate your immediate response to this consultation.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or email me at ammontano@bpa.gov.

Sincerely,

/s/ Andrew M. Montaña, December 10, 2010

Andrew M. Montaña
Environmental Protection Specialist

Enclosures:
APE Map
Project Overview Map



Cowlitz Indian Tribe

P.O. Box 2547 Longview, WA 98632
360.577.8140 577.7432 (f)

March 21, 2011

Andrew M. Montañó
Environmental Protection Specialist
Department of Energy
Bonneville Power Administration
PO Box 3621
Portland, OR 97208-3621

RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington.

Dear Mr. Montañó:

In reference to the project stated above, the Cultural Resources Department of the Cowlitz Indian Tribe would like to state its interest.

The Cowlitz Indian Tribe recommends an Inadvertent Discovery Plan be attached to the permit; we have included language for your consideration.

Please contact us with any questions or concerns you may have. We look forward to working with you on this undertaking.

Thank you for your time and attention.

All My Relations,

dAVe burlingame
Director, Cultural Resources
360.577.6962
508.1677 [c]
577.6207 [f]

CC: Rob Whitlam, Department of Archaeology and Historic Preservation
Ed Arthur, Cowlitz Indian Tribe



Cowlitz Indian Tribe Cultural Resources Department

P.O. Box 2547 1055 9th Ave. Suite C Longview, WA 98632
360.577.6962 577.6207 (f) www.cowlitz.org



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2010

In reply refer to: KEC-4

McCoy Oatman, Chairman
Cultural Resources Director
Columbia River Inter-Tribal Fish Commission
729 NE Oregon St., Ste 200
Portland, OR 97232

Certified Mail
Return Receipt Requested
7009-2820-0002-3433-0270

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Oatman:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Office of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Nez Perce Tribe of Idaho, and The Confederated Tribes and Bands of the Yakama Reservation pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effect (APE) for the proposed project has been determined and is located on the attached APE Map. Additionally, a project overview map is also being included to depict the total project area of the proposed wind facility and that of BPA's proposed action. The project will be located in T3N, R10E, Sections 7 and 18 (Northwestern Lake Quadrangle). The APE is briefly described below.

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If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or email me at ammontano@bpa.gov.

Sincerely,

/s/ Andrew M. Montañó, Aug. 2, 2010

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:
APE Map
Project Overview Map



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2010

In reply refer to: KEC-4

Carey Miller, THPO
Cultural Resources Protection Program
Confederated Tribes of the Umatilla Indian Reservation
46411 Timine Way
Pendleton, OR 97801

Certified Mail
Return Receipt Requested
7009-2820-0002-3432-8888

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Ms. Miller:

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Sincerely,

/s/ Andrew M. Montañó, Aug. 2, 2010

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:
APE Map
Project Overview Map



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2010

In reply refer to: KEC-4

Robert Brunoe, THPO
Confederated Tribes of the Warm Springs Reservation of Oregon
P.O. Box C
Warm Springs, OR 97761

Certified Mail
Return Receipt Requested
7009-2820-0002-3432-8895

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Brunoe:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Office of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Nez Perce Tribe of Idaho, The Confederated Tribes and Bands of the Yakama Reservation, and The Columbia River Inter-Tribal Fish Commission (CRITFC) pursuant to 36 CFR 800.4(a)(4).

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Sincerely,

/s/ Andrew M. Montañó, Aug. 2, 2010

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:
APE Map
Project Overview Map



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2010

In reply refer to: KEC-4

Keith Baird
Cultural Resources Director
Nez Perce Tribe of Idaho
P.O. Box 305
Lapwai, ID 83540

Certified Mail
Return Receipt Requested
7009-2820-0002-3433-0263

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Baird:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Office of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Confederated Tribes and Bands of the Yakama Reservation, and The Columbia River Inter-Tribal Fish Commission (CRITFC) pursuant to 36 CFR 800.4(a)(4).

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The proposed project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line. The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built.

This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

Upon receipt of comments from your office concerning the proposed project and APE, BPA will determine the appropriate action for the identification and protection of historic properties within the APE. This may include tribal input for Traditional Cultural Properties, if indicated as an area of concern for yours or any of the other contacted tribes. A field survey covering the entire APE shown on the enclosed map is planned to be conducted. Furthermore, the identification, evaluation, and mitigation activities will be conducted by an individual meeting the Secretary of the Interior' standards. Following the background research and field survey, a technical report will be prepared and submitted to your office and to any affected tribes.

In this initiation of consultation, BPA seeks your concurrence on the proposed undertaking and APE discussed above. We also seek any information that you might have on known archaeological resources in the project area. Based on the interest of time, we anticipate your immediate response to this consultation.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or email me at ammontano@bpa.gov.

Sincerely,

/s/ Andrew M. Montañó, Aug. 2, 2010

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:
APE Map
Project Overview Map



Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
Toppenish Washington 98948

RECEIVED

JUN 17 2010

5/27/2010

ENVIRONMENT
FISH & WILDLIFE

Stephen Posner
Compliance Manager, EFSEC
905 Plum Street SE
Olympia, Washington 98504-3172

Andrew M. Montano
Environmental Project Manager
Bonneville Power Administration
P.O. Box 14428
Portland, Oregon 97293-4428

Dear Mr. Posner and Mr. Montano,

We have reviewed the recent Draft Environmental Impact Statement (DEIS) compiled for the Whistling Ridge Energy Facility. In doing so, we noted under section 3.10.2.2 no mention has been made of the finding of the Yakama Nation Cultural Resources Program study which resulted in the findings of Traditional Cultural Property within the proposed wind project lands. The DEIS states that:

"A field investigation by Yakama Nation cultural resources specialists occurred in December 2009. The Yakama Nation's findings, currently in preparation, will supplement the information contained in this EIS."

However, the results of the field investigation were reported to SDS Lumber and the Department of Archaeology and Historic Preservation in December of 2009, shortly after the site visit was completed. We, therefore, are taking this opportunity to resubmit this report to the Energy Facility Siting Evaluation Council (EFSEC) and the Bonneville Power Administration (BPA). It is our directive that this report be included in the Final Environmental Impact Statement as a portion of the consultation responsibilities held by BPA and EFSEC.

Sincerely,

Ruth Jim
Chairman, Yakama Nation Roads, Irrigation, and Lands Committee

Cc: Yakama Nation Cultural Resources Program
Gretchen Kaehler, Department of Archaeology and Historic Preservation
Richard Till, Fiends of the Columbia Gorge



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

Memorandum

RECEIVED

JUN 17 2010

ENVIRONMENT
FISH & WILDLIFE

**To: Andrew Montano, Manager
Environmental Project**

**From: Harry Smisken, Chairman
Yakama Nation Tribal Council**

Date: June 15, 2010

Subject: Whistling Ridge Energy Project

I, the Chairman of Yakama Nation Tribal Council, am requesting a continuance of thirty (30) days to review and comment on the Whistling Ridge Energy Project. My staff and I have not had the chance to meet on this important matter, and we would like to provide you with our input.

*Chairman Harry Smisken
P.O. Box 151
Yakama Nation
Toppenish, Wa 98948*

*copy to: Tribal Council
Lavina Washines
LAVINA WASHINES*



Department of Energy

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

ENVIRONMENT, FISH AND WILDLIFE

August 23, 2010

In reply refer to: KEC-4

Mr. Harry Smiskin, Chairman
Yakama Nation Tribal Council
Confederated Tribes and Bands of the Yakama Nation
P.O. Box 151
Toppenish, WA 98948

Certified Mail
Return Receipts Required
7009-2250-0000-1562-5288

Dear Mr. Smiskin:

The Bonneville Power Administration (BPA) is nearing its deadline for comments regarding the Draft Environmental Impact Statement (DEIS) issued for the Whistling Ridge Energy Project. I would be interested in hearing from the Confederated Tribes and Bands of the Yakama Nation regarding your input to this project. I hope that you have had sufficient time to look at our DEIS and welcome any suggestions you may have. Additionally, I wanted to let you know that BPA has received concurrence to the Area of Potential Effects from the Washington State Historic Preservation Office regarding the location where our interconnection would take place if this proposed project were to move forward.

I welcome any questions and/or comments that you may have regarding this project. Please feel free to contact me directly at (503) 230-4145 or at ammontano@bpa.gov at any time.

Thank you for your interest in this project.

Sincerely,

/s/Andrew Montano 08-30-2010

Andrew M. Montano
Environmental Project Manager – KEC-4

cc:

Ms. Kate Valdez, THPO
Mr. Johnson Meninick, Cultural Resources Program Manager
Ms. Lavina Washines, Yakama Nation



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

August 2, 2010

In reply refer to: KEC-4

Ms. V. Kate Valdez, THPO
Confederated Tribes and Bands of the Yakama Reservation
P.O. Box 151
Toppenish, WA 98948

Certified Mail
Return Receipt Requested
7009-2820-0002-3433-0058

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Ms. Valdez:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Office of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Nez Perce Tribe of Idaho, and The Columbia River Inter-Tribal Fish Commission (CRITFC) pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effect (APE) for the proposed project has been determined and is located on the attached APE Map. Additionally, a project overview map is also being included to depict the total project area of the proposed wind facility and that of BPA's proposed action. The project will be located in T3N, R10E, Sections 7 and 18 (Northwestern Lake Quadrangle). The APE is briefly described below.

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Upon receipt of comments from your office concerning the proposed project and APE, BPA will determine the appropriate action for the identification and protection of historic properties within the APE. This may include tribal input for Traditional Cultural Properties, if indicated as an area of concern for yours or any of the other contacted tribes. A field survey covering the entire APE shown on the enclosed map is planned to be conducted. Furthermore, the identification, evaluation, and mitigation activities will be conducted by an individual meeting the Secretary of the Interior' standards. Following the background research and field survey, a technical report will be prepared and submitted to your office and to any affected tribes.

In this initiation of consultation, BPA seeks your concurrence on the proposed undertaking and APE discussed above. We also seek any information that you might have on known archaeological resources in the project area. Based on the interest of time, we anticipate your immediate response to this consultation.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or email me at ammontano@bpa.gov.

Sincerely,

/s/ Andrew M. Montañó, Aug. 2, 2010

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:
APE Map
Project Overview Map



Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
Toppenish Washington 98948

Andrew M. Montano
Environmental Protection Specialist
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

9/10/2010

RE: Proposed Whistling Ridge Energy Project Skamania County, Washington

Thank you for contacting Yakama Nation regarding the Proposed Whistling Ridge Energy Project. The Project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855, between the Yakama Nation and the United States Government. The Treaty set forth that the Yakama Nation shall retain rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

Yakama Nation does not agree with the APE defined by the Bonneville Power Administration (BPA). The Whistling Ridge Energy Project Draft Environmental Impact Statement (DEIS) implies that the Whistling Ridge project is dependent upon a BPA interconnection. Page 1-6 of the DEIS states,

“ . . . it is critical to locate projects in areas where transmission lines currently exit. The Applicant thus needs to locate near exiting high-voltage transmission, such as the FCRTS.”

Since the Whistling Ridge Project cannot proceed without BPA interconnection, we believe this project should be reviewed under NEPA, BPA involvement creating a federal nexus. Therefore, the appropriate APE for the BPA interconnection should include the entire Whistling Ridge Project area.

Yakama Nation CRP has provided both EFSEC and BPA information regarding the existence of Traditional Cultural Properties within the Whistling Ridge Project. We trust that prior to interconnection with this facility, BPA will ensure that Yakama Nation's concerns regarding the DEIS are addressed and that consultation regarding the identified cultural resources is completed.

If you have any questions, please feel free to contact me at 509-865-5121 x4737, or Yakama Nation Archaeologist, Jessica Lally at x4766.

Sincerely,

George Colby
Attorney for the Yakama Nation Executive Committee

RECEIVED

SEP 21 2010

ENVIRONMENTAL
FISH & WILDLIFE



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

Robert Whitlam, PhD.
State Archaeologist
Department of Archeology and Historic Preservation
1063 S. Capitol Way, Suite 106
Olympia, WA 98501

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5501

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18
Log No.: 080910-26-BPA**

Dear Dr. Whitlam:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed interconnection is a federal undertaking that has the potential to cause effects on historic properties and initiated consultation with your agency – the Washington State Office of Archeology and Historic Preservation. BPA also initiated consultation with The Confederated Tribes of the Umatilla Indian Reservation, The Cowlitz Indian Tribe, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Nez Perce Tribe of Idaho, The Confederated Tribes and Bands of the Yakama Reservation, and The Columbia River Inter-Tribal Fish Commission pursuant to 36 CFR 800.4(a)(4).

As acknowledged by your office on August 9, 2010, the Area of Potential Effects for the proposed interconnection will be limited to the following locations: T3N, R10E, Section 7 and Section 18 (Northwestern Lake Quadrangle). The proposed interconnection is described below.

The proposed interconnection would include the construction of a new BPA substation located within the wind development's project area, which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line. The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional

transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This proposed interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

A cultural survey was performed at this location on November 9-11th, 2009, and the survey report is being included with this letter. On September 10, 2010, BPA was contacted by The Confederated Tribes and Bands of the Yakama Reservation in which the Tribe expressed that the APE should include the proposed wind development (which encompassed some culturally-sensitive areas) in addition to the proposed interconnection. BPA met with representatives of the Tribe on May 2nd, 2011, to discuss the Tribe's request for an expanded APE. BPA discussed with the Tribe that BPA has no jurisdiction over siting of wind development facilities, a matter left to Washington EFSEC, and that BPA's APE is limited to the proposed interconnection.

After reviewing the findings of the cultural survey report, BPA finds that the nature and the location of this proposed interconnection poses a very minimal potential to cause effects to historic properties. Therefore, it is the opinion of the BPA Archeologist that the undertaking should result in *no historic properties affected*. In the unlikely event that archaeological materials are encountered during the implementation of this interconnection, an archaeologist will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed. Additionally, if any findings did occur, your office and the appropriate Tribes will be notified of any future findings.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or by email at ammontano@bpa.gov. The BPA Archeologist, Nicole Brannan, can also be contacted at (503) 230-7579 or at nfbrannan@bpa.gov.

Sincerely,

/s/ Andrew M. Montañó, June 2, 2011
Andrew M. Montañó
Environmental Protection Specialist

Enclosure:
Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington.



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

June 16, 2011

Mr. Andrew M. Montano
Environment, Fish & Wildlife
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208-3621

Re: Whistling Ridge Energy Substation Project
Log No.: 080910-26-BPA

Dear Mr. Montano;

Thank you for contacting our department. We have reviewed the professional archaeological survey report you provided for the proposed Whistling Ridge Energy Substation Project, Skamania County, Washington.

We concur with your determination of No Historic Properties Affected.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

dAve Burlingame, Director
Cowlitz Indian Tribe
PO Box 2547
Longview, WA 98632

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5440

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Burlingame:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Department of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Confederated Tribes and Bands of the Yakama Reservation, The Nez Perce Tribe of Idaho, and The Columbia River Inter-Tribal Fish Commission (CRITFC) pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effects will be limited to the following locations: T3N, R10E, Section 7 and Section 18 (Northwestern Lake Quadrangle). The APE is described below.

The proposed Project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line (an interconnection). The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

A cultural survey was performed at this location on November 9-11th, 2009, and the survey report is being included with this letter. After reviewing the findings of the cultural survey report, the undertaking, and the APE, BPA feels that the nature and the location of this proposed interconnections poses a very minimal potential to cause effects to historic properties. Therefore, it is the opinion of the BPA Archaeologist that the undertaking should result in ***no historic properties affected***. In the unlikely event that archaeological materials are encountered during the implementation of this project, an archaeologist will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed. Additionally, if any findings did occur, your office and any other interested parties will be notified of any future findings. If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or by email at ammontano@bpa.gov. The BPA Archeologist, Nicole Brannan, can also be contacted at (503) 230-7579 or at nfbrannan@bpa.gov.

Sincerely,

/s/ Andrew M. Montaña, June 2, 2011
Andrew M. Montaña
Environmental Protection Specialist

Enclosures:

Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington. (CD and Hard Copy)



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

McCoy Oatman, Chairman
Cultural Resources Director
Columbia River Inter-Tribal Fish Commission
729 NE Oregon St., Ste 200
Portland, OR 97232

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5457

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Oatman:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Department of Archeology and Historic Preservation, as well as The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, The Confederated Tribes and Bands of the Yakama Reservation, The Nez Perce Tribe of Idaho, and The Cowlitz Indian Tribe pursuant to 36 CFR 800.4(a)(4).

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Sincerely,

/s/ Andrew M. Montaña, June 2, 2011

Andrew M. Montaña

Environmental Protection Specialist

Enclosures:

Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington. (CD and Hard Copy)



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

Carey Miller, THPO
Cultural Resources Protection Program
Confederated Tribes of the Umatilla Indian Reservation
46411 Timine Way
Pendleton, OR 97801

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5464

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Ms. Miller:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Department of Archeology and Historic Preservation, as well as The Columbia River Inter-Tribal Fish Commission (CRITFC), The Confederated Tribes of the Warm Springs Reservation of Oregon, The Confederated Tribes and Bands of the Yakama Reservation, The Nez Perce Tribe of Idaho, and The Cowlitz Indian Tribe pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effects will be limited to the following locations: T3N, R10E, Section 7 and Section 18 (Northwestern Lake Quadrangle). The APE is described below.

The proposed Project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line (an interconnection). The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

A cultural survey was performed at this location on November 9-11th, 2009, and the survey report is being included with this letter. After reviewing the findings of the cultural survey report, the undertaking, and the APE, BPA feels that the nature and the location of this proposed interconnection poses a very minimal potential to cause effects to historic properties. Therefore, it is the opinion of the BPA Archaeologist that the undertaking should result in ***no historic properties affected***. In the unlikely event that archaeological materials are encountered during the implementation of this project, an archaeologist will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed. Additionally, if any findings did occur, your office and any other interested parties will be notified of any future findings. If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or by email at ammontano@bpa.gov. The BPA Archeologist, Nicole Brannan, can also be contacted at (503) 230-7579 or at nfbrannan@bpa.gov.

Sincerely,

/s/ Andrew M. Montañó, June 2, 2011

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:

Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington. (CD and Hard Copy)



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

Robert Brunoe, THPO
Confederated Tribes of the Warm Springs Reservation of Oregon
P.O. Box C
Warm Springs, OR 97761

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5471

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Brunoe:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Department of Archeology and Historic Preservation, as well as The Columbia River Inter-Tribal Fish Commission (CRITFC), The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes and Bands of the Yakama Reservation, The Nez Perce Tribe of Idaho, and The Cowlitz Indian Tribe pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effects will be limited to the following locations: T3N, R10E, Section 7 and Section 18 (Northwestern Lake Quadrangle). The APE is described below.

The proposed Project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line (an interconnection). The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

A cultural survey was performed at this location on November 9-11th, 2009, and the survey report is being included with this letter. After reviewing the findings of the cultural survey report, the undertaking, and the APE, BPA feels that the nature and the location of this proposed interconnection poses a very minimal potential to cause effects to historic properties. Therefore, it is the opinion of the BPA Archaeologist that the undertaking should result in ***no historic properties affected***. In the unlikely event that archaeological materials are encountered during the implementation of this project, an archaeologist will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed. Additionally, if any findings did occur, your office and any other interested parties will be notified of any future findings. If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or by email at ammontano@bpa.gov. The BPA Archeologist, Nicole Brannan, can also be contacted at (503) 230-7579 or at nfbrannan@bpa.gov.

Sincerely,

/s/ Andrew M. Montañó , June 2, 2011

Andrew M. Montañó
Environmental Protection Specialist

Enclosures:

Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington. (CD and Hard Copy)



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

Keith "Patrick" Baird, THPO
Nez Perce Tribe of Idaho
P.O. Box 305
Lapwai, ID 83540

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5488

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Mr. Baird:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Department of Archeology and Historic Preservation, as well as The Columbia River Inter-Tribal Fish Commission (CRITFC), The Confederated Tribes of the Umatilla Indian Reservation, The Confederated Tribes and Bands of the Yakama Reservation, The Confederated Tribes of the Warm Springs Reservation of Oregon, and The Cowlitz Indian Tribe pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effects will be limited to the following locations: T3N, R10E, Section 7 and Section 18 (Northwestern Lake Quadrangle). The APE is described below.

The proposed Project would include the construction of a new BPA substation located within the project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line (an interconnection). The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

A cultural survey was performed at this location on November 9-11th, 2009, and the survey report is being included with this letter. After reviewing the findings of the cultural survey report, the undertaking, and the APE, BPA feels that the nature and the location of this proposed interconnection poses a very minimal potential to cause effects to historic properties. Therefore, it is the opinion of the BPA Archaeologist that the undertaking should result in ***no historic properties affected***. In the unlikely event that archaeological materials are encountered during the implementation of this project, an archaeologist will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed. Additionally, if any findings did occur, your office and any other interested parties will be notified of any future findings. If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or by email at ammontano@bpa.gov. The BPA Archeologist, Nicole Brannan, can also be contacted at (503) 230-7579 or at nfbrannan@bpa.gov.

Sincerely,

/s/ Andrew M. Montaña, June 2, 2011

Andrew M. Montaña

Environmental Protection Specialist

Enclosures:

Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington. (CD and Hard Copy)



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 2, 2011

In reply refer to: KEC-4

Ms. V. Kate Valdez, THPO
Confederated Tribes and Bands of the Yakama Reservation
P.O. Box 151
Toppenish, WA 98948

Certified Mail
Return Receipt Requested
7011-0470-0002-8720-5495

**RE: Proposed Whistling Ridge Energy Project, Skamania County, Washington
Northwestern Lake Quad, T3N, R10E, Sections 7 and 18**

Dear Ms. Valdez:

Bonneville Power Administration (BPA) is proposing to interconnect the Whistling Ridge Energy Project in Skamania County, WA. This proposed interconnection would connect up to 70 MW from the proposed wind facility consisting of up to approximately 50, 1.2- to 2.5-MW wind turbines. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA has determined that the proposed action is a federal undertaking that has the potential to cause effects on historic properties and seeks to initiate consultation with your Tribe. BPA also initiated consultation with the Washington State Department of Archeology and Historic Preservation, as well as The Columbia River Inter-Tribal Fish Commission (CRITFC), The Confederated Tribes of the Umatilla Indian Reservation, The Nez Perce Tribe of Idaho, The Confederated Tribes of the Warm Springs Reservation of Oregon, and The Cowlitz Indian Tribe pursuant to 36 CFR 800.4(a)(4).

The Area of Potential Effects for the proposed interconnection will be limited to the following locations: T3N, R10E, Section 7 and Section 18 (Northwestern Lake Quadrangle). The proposed interconnection is described below.

The proposed interconnection would include the construction of a new BPA substation located within the wind development's project area which would assist in the transfer of the power generated from the project onto BPA's North Bonneville-Midway 230-kV transmission line. The BPA substation would cover an area of approximately 430 feet by 430 feet or approximately 4.25 acres. This area would be fenced, graded and graveled. Inside the fence, there will be a control house, six 230-kV disconnect switches, three 230-kV power circuit breakers, steel structures and towers, insulators and bus work associated with substations. There will be a graveled access road to the site as well as access roads running underneath the additional transmission line structures that will be built. This development of 4.25 acres would be sufficient for future installation of equipment if required for future development.

This proposed interconnection would be made through a loop-in of BPA's North Bonneville-Midway 230-kV transmission line to the proposed BPA substation. The loop-in would require

several steel lattice and wood pole structures (some of the wood pole structures may be guyed) to be placed adjacent to both the North Bonneville-Midway 230-kV and Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV transmission lines. The Underwood Tap to Bonneville Powerhouse 1-North Camas 115-kV line adjacent to North Bonneville-Midway 230-kV transmission line would require a new steel lattice structure to raise the conductors such that the 230-kV line can cross underneath for this interconnection.

A cultural survey was performed at this location on November 9-11th, 2009, and the survey report is being included with this letter. By letter dated May 27th, 2010, the Tribe submitted its Yakama Nation Cultural Resource Review and Consultation for the Whistling Ridge Energy Project. This report identified culturally-sensitive areas within the wind development's project area. By letter dated September 10, 2010, the Tribe expressed that the APE should include the proposed wind development (which encompassed the culturally-sensitive areas) in addition to the proposed interconnection. BPA met with representatives of the Tribe on May 2nd, 2011, to discuss the Tribe's request for an expanded APE. BPA discussed with the Tribe that BPA has no jurisdiction over siting of wind development's facilities, a matter left to Washington EFSEC, and that BPA's APE is limited to the proposed interconnection. BPA and the Tribe also discussed the Tribe's concerns about the culturally-sensitive areas in the wind development project area. We discussed BPA's lack of jurisdiction of siting authority in relation to placement of turbine strings. BPA agreed that it would disclose the Tribal concerns about these culturally-sensitive areas in our Final EIS, but BPA is unable to address these concerns as a matter of Section 106 consultation under the NHPA.

BPA recognizes that there are culturally-sensitive areas within the wind development's project area. However, for purposes of the proposed interconnection APE, based on all of the survey results, it is the opinion of the BPA Archaeologist that the proposed interconnection should result in *no historic properties affected*. In the unlikely event that archaeological materials are encountered during the implementation of this proposed interconnection, an archaeologist will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed. Additionally, if any findings did occur, your office and any other interested parties will be notified of any future findings.

If you have any questions or concerns, please do not hesitate to contact me at (503) 230-4145 or by email at ammontano@bpa.gov. The BPA Archeologist, Nicole Brannan, can also be contacted at (503) 230-7579 or at nfbrannan@bpa.gov.

Sincerely,

/s/ Andrew M. Montaña, June 2, 2011
Andrew M. Montaña
Environmental Protection Specialist

Enclosure:

Cultural Resources Inventory Report for the Whistling Ridge Energy Project, Skamania County, Washington.

Appendix E-3
BPA Section 7(a) Consultation Letters



Department of Energy

Official File

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

ENVIRONMENT, FISH AND WILDLIFE

June 8, 2010

In reply refer to: KEC-4

Mr. James Michaels
U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
510 Desmond Drive SE
Lacey, WA 98503

Dear Mr. Michaels:

Bonneville Power Administration (BPA) is proposing to interconnect up to 70 megawatts (MW) of new wind energy from the proposed Whistling Ridge Energy Project onto the North Bonneville-Midway 230-kilovolt transmission line. This interconnection request was made by the SDS Lumber Company in Bingen, Washington, and interconnection would take place approximately five miles west of BPA's Underwood Substation in Skamania County, Washington. Subsequently, SDS Lumber Company created a new limited liability company called Whistling Ridge Energy LLC (WRE), which submitted an application with the State of Washington's Energy Facility Site Evaluation Council (EFSEC) for site certification on this wind facility project. WRE would finance, develop, own and operate the proposed wind project. The proposed wind facility would consist of up to approximately 50, 1.2- to 2.5-MW wind turbines up to 426 feet tall, as well as infrastructure such as newly-constructed and improved roads, transformers, underground collector lines, a substation, and an operations and maintenance facility.

The proposed Whistling Ridge Energy Project would be located on private land located approximately 7 miles northwest of the City of White Salmon in Skamania County, Washington (*See* Figure 1). The Project would be located on commercial forestland in an unincorporated area of Skamania County, outside of the Columbia Gorge National Scenic Area. The Project Area encompasses approximately 1,152 acres in Sections 5, 6, 7, 8, and 18 of Township 3 North, Range 10 East, and in Section 13 of Township 3 North, Range 9 East.

To inform its decision on whether to allow the proposed interconnection, BPA is preparing a joint Environmental Impact Statement with the EFSEC as required under the National Environmental Policy Act (NEPA) of 1969, as amended. A species list for Skamania County, Washington, was obtained from the U.S. Fish and Wildlife Service (USFWS) web site (<http://www.fws.gov/wafwo/speciesmap/SKAMAN.html>) on December 30, 2009. Northern spotted owl (*Strix occidentalis caurina*) is listed as threatened, and designated critical habitat exists for this species within Skamania County. None of these species have been known to occur in the vicinity of the project site and there have been extensive surveys conducted as part of the

project permitting (See *Whistling Ridge Energy Project Draft Environmental Impact Statement May 2010, Chapter 3*, <http://www.bpa.gov/go/whistling>). BPA is seeking to initiate informal consultation under Section 7 of the Endangered Species Act (ESA) of 1973, as amended, to analyze the effects of both its actions and those of the developer on Northern spotted owl and their critical habitat because of the historic presence of Northern spotted owl core areas. Based upon collected information, BPA has determined that the proposed actions **may affect but are not likely to adversely affect Northern spotted owl** (*Strix occidentalis caurina*) or its critical habitat designated under the ESA. This letter provides documentation for this determination.

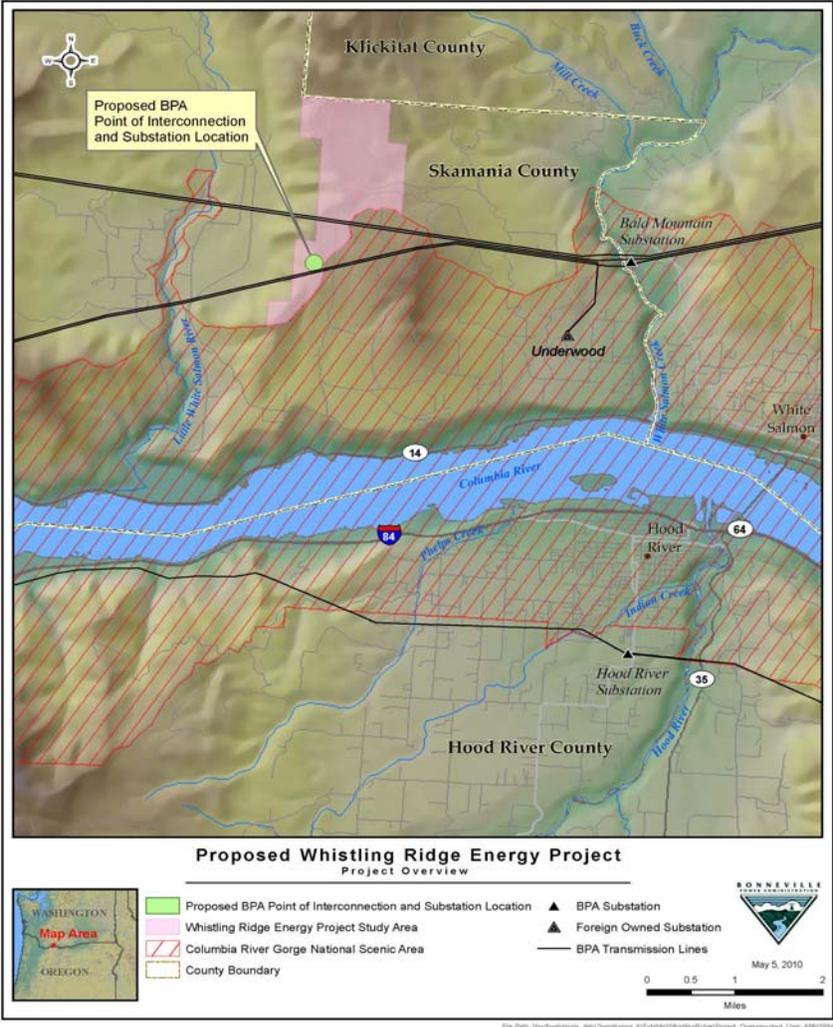


Figure 1. Whistling Ridge Energy Project Location.

EFFECTS DETERMINATION

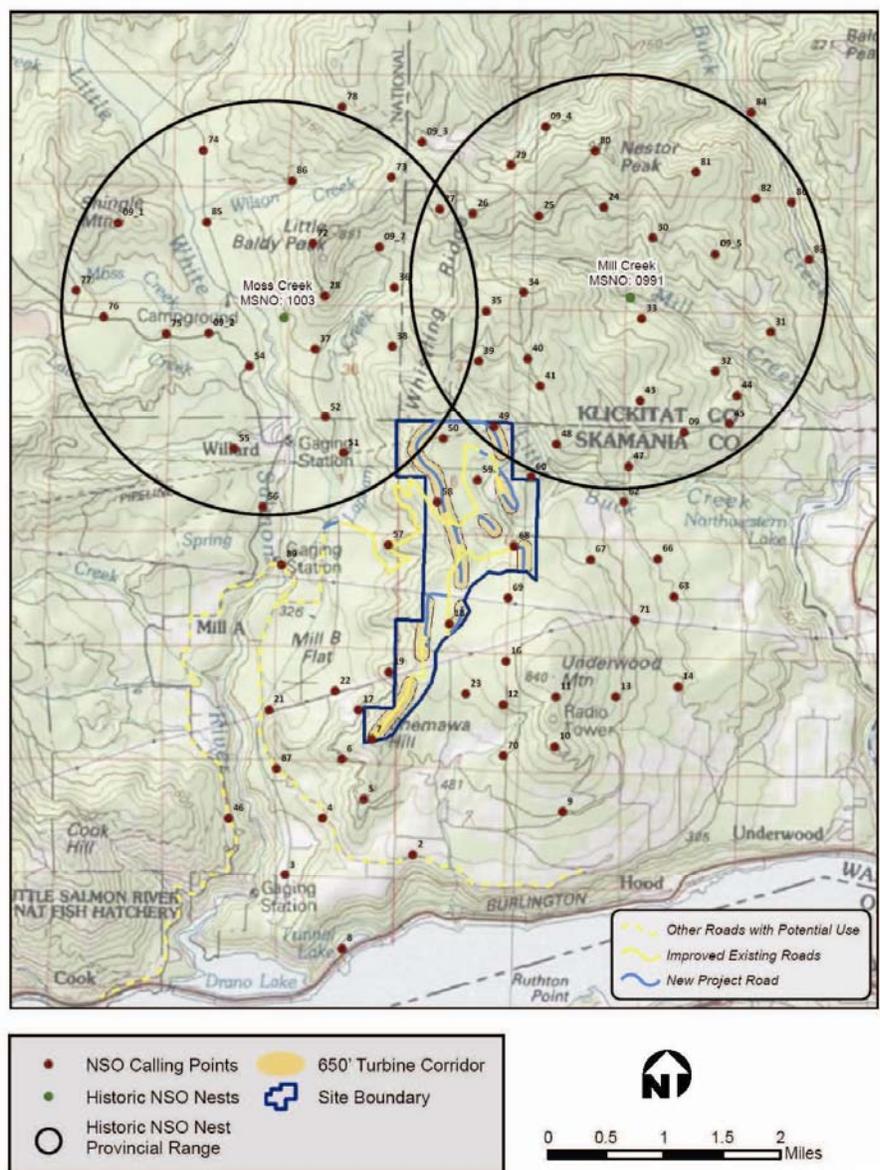
Level of use of the Project Area by Northern spotted owl

Historically, Northern spotted owl activity cores were located on public lands (managed by Washington Department of Natural Resources (WDNR) and the U.S. Forest Service) to the north of the Project Area as seen in Figure 2. These owl cores were designated as the Mill Creek (MSNO#: 0991) and Moss Creek (MSNO#: 1003) cores and were located in Township 4 North and Range 10 East Section 28 and Township 4 North and Range 9 East Section 35, respectively. During both 2008 and 2009, surveys were conducted to these historically-used areas and no spotted owl observations or responses were recorded.

Surveys for the presence of Northern spotted owls were conducted during 2008-2009 within the Project Area. A total of 80 calling stations were established and surveyed during 2008 and no Northern spotted owl responses or observations were noted. Seven supplemental stations were added in 2009 adjacent to areas that were determined to have potential habitat. No observations or detections of Northern spotted owls at any of the 87 established calling stations were noted during 2009.

Northern spotted owl surveys were spread strategically throughout the nesting season in an attempt to see or hear spotted owls. The survey effort covered potentially suitable Northern spotted owl habitat within the approximately 22,123 acres of survey area. There were no Northern spotted owl observations or responses during any of the survey visits.

Additionally, surveys were conducted during the 2003-2004 survey periods. The project site was surveyed from March-July 2003 using the one-year survey methodology, and from March-August 2004 using the two-year survey methodology. USFWS protocol allows a six-visit survey followed by three-visit survey over two years to rule out northern spotted owls for the following two years (USFWS, 1992). No northern spotted owls were detected during the 2003-2004 surveys.



2008-2009 Spotted Owl Calling Points

Whistling Ridge Energy Project

Figure 2. Locations of survey calling stations for Northern spotted owls during 2008-2009.

Effect of the Project on Northern spotted owl's primary food stocks, prey species, and foraging areas in all areas influenced by the Project

Reduction of suitable habitat poses a significant threat to the Northern spotted owl (habitat in which primary food stocks, foraging, and predation would occur). For the purposes of this Project, potentially suitable spotted owl habitat was determined to be coniferous stands with average tree DBH (diameter at breast height) greater than 12 inches and canopy closure of 60% or greater. These standards for suitable spotted owl habitat were based on the availability of forest stand classification GIS data obtained from SDS Lumber Company. The types of habitats required by spotted owls are typically not present over large areas on managed commercial forest lands. Areas that have been recently cut or areas of young conifer plantations that did not meet the minimum average DBH or canopy closure parameters were excluded from the 2008-2009 survey efforts mentioned above. The resulting designated survey areas did contain varying types of habitat that could potentially be used by spotted owls. With respect to the historical owl cores, data collected by the WDNR and by personnel from the National Council for Air and Stream Improvement (NACASI) indicated that no Northern spotted owl were detected in the Mill Creek core since the 2000 breeding season. Consequently, the Moss Creek core has not had a Northern spotted owl detected since the 2002 breeding season.

During the 2008 and 2009 survey seasons, contract biologists recorded all owl species encountered and the sightings of or responses by potential Northern spotted owl predators. This included barred owls, great horned owls, northern goshawks and other raptor species. As stated above, no Northern spotted owl observations or responses were recorded. However, both of the historic Northern spotted owl cores showed an increased presence of barred owls. Based on the best available scientific information, competition from the barred owl (*Strix varia*) also poses a significant and complex threat to the Northern spotted owl.

Impacts from Project activities and implementation that may result in disturbance to Northern spotted owl and/or their avoidance of the Project Area

Whistling Ridge Energy LLC has sited its proposed project to avoid habitat areas deemed critical to the Northern spotted owl or essential to its recovery. Surveys conducted pursuant to the USFWS protocol indicate that spotted owls are not present in or near the project, and that nearby historical sites are no longer occupied pursuant to USFWS Protocol and state law. Because there are no Northern spotted owls or activity centers present in the project area, no project construction or operation impacts are expected. Finally, the project would not impact the White Salmon spotted owl special emphasis area's 40 percent suitable habitat level and therefore is not restricted by Washington's forest practice regulations. Given the extensive record and review, this project does not pose a risk of taking Northern spotted owls under Endangered Species Act Section 9.

Based on this information, BPA has determined that the proposed actions may affect, but is not likely to adversely affect the Northern spotted owl or its designated critical habitat. BPA is requesting your review on the information contained in this letter and your concurrence with our findings. Please contact me at (503) 230-4145, or e-mail ammontano@bpa.gov , if you have any questions or require additional information.

Sincerely,

/s/ Andrew M. Montaña, June 8, 2010

Andrew M. Montaña

Environmental Protection Specialist – KEC-4

Enclosure:

2009 Final Report – Results of Northern spotted owl, western grey squirrel and Northern goshawk surveys conducted for the Whistling Ridge Energy Project

Reference:

USFWS, 1992. Recovery plan for the Northern spotted owl. United States Fish and Wildlife Service.

cc: (w/o enclosure):

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

Barbara Craig - Stoel and Rives
900 SW Fifth Avenue, Suite 2600
Portland, OR 97204



United States Department of the Interior



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

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

JUL 19 2010

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

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

Dear Mr. Montano:

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

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

Project Location

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



Summary of the Proposed Action

The Bonneville Power Administration (BPA) is proposing to interconnect up to 70 megawatts (MW) of new wind energy from the proposed Project to the North Bonneville-Midway 230-kilovolt transmission line. The interconnect would occur at a new sub-station to be built about 5 miles west of BPA's Underwood Substation in Skamania County. The interconnect was requested by the Project proponent, SDS Lumber Company, in Bingen, Washington. The SDS Lumber Company has created a new limited liability company called Whistling Ridge Energy LLC (WRE) that would finance, develop, and operate the Project. The Project is expected to operate for at least 30 years. The proposed Project would consist of no more than 50, 1.2 MW- to 2.5- MW wind turbines up to 426 feet tall, as well as infrastructure such as newly constructed and improved roads, transformers, underground energy-collector lines, a substation, and an operations and maintenance facility. The Project area consists of 1,152 acres of mostly commercial forests in various age categories, of which 384 acres would be disturbed by the Project, and all but 61 acres would remain in commercial forest. Most of the property where the turbine strings are planned has been recently clear-cut harvested and will be further disturbed with the development of the turbine pads.

Status of Spotted Owls in the Project Area

Two spotted owl territories are located on Washington State Department of Natural Resources (DNR) and National Forest lands located north of and adjacent to the Project. The site center for the Mill Creek owl (MSNO#0991) is located in Township 4 North, Range 10 East, Section 28 and the site center for the Moss Creek owl (MSNO#1003) is located in Township 4 North, Range 9 East, Section 35. Both of these owl territories are within Washington State's White Salmon Spotted Owl Special Emphasis Area, which provides added protection for spotted owls located on private lands through the Washington State Forest Practices Rules. Both of the 70 acre core areas are located on DNR lands and are provided additional protection from their Habitat Conservation Plan for the State Trust Lands.

The estimated median annual home range size for the spotted owl in this physiographic province is approximately 6,657 acres, which for regulatory purposes is assumed to lie within a 1.8-mile radius circle. Best available science indicates that when the amount of suitable spotted owl habitat within a circle falls below 40 percent, there is a likelihood of "take" under section 9 of the ESA. Each of these territories contains more than 40 percent suitable spotted owl habitat (J. Spadaro pers. com. 2009). A small portion of the Moss Creek circle overlaps the northern end of the Project and contains dispersal habitat and some foraging habitat. However, removal of this small amount of habitat (2 acres) would not reduce the habitat acreage below 40 percent in either territory.

Protocol spotted owl surveys were conducted within these estimated home ranges during the 2003, 2004, 2008, and 2009 breeding seasons. Numerous barred owls (*Strix varia*) were detected, but no spotted owls were detected; however, because of the presence of barred owls with these territories, it is possible that spotted owls were present but did not vocalize. The 2009 surveys followed the Service's revised 2010 protocol to better elicit spotted owl responses in the presence of barred owls (USFWS 2010) (the consultant contacted the U.S. Fish and Wildlife

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

Effects from Construction

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

Effects from Maintenance

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

Risk of Spotted Owl Collision with Wind Turbines

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

Spotted owls less commonly use recent clear-cuts or burned areas for foraging, but spotted owls do occasionally cross such areas while dispersing between patches of older forest (Forsman et al. 1984; 2002). Although spotted owls do occasionally disperse across open areas, they usually avoid crossing such areas by travelling through corridors of forested habitat (Forsman et al. 1984). The typical flight behavior of the spotted owls is described in the *Birds of North America*:

“Quick wingbeats interspersed with gliding flight. Not a fast flier. Long flights unusual except during dispersal...Flight labored when attempting to fly to a higher perch or up to nest sites. When gaining altitude in the forest canopy, makes a series of short climbing flights rather than continuous flight. Flights above the forest canopy probably rare except during dispersal. (Gutierrez et al 1995, p. 9).”

During natal dispersal, spotted owls will occasionally cross open areas and, as noted above, may occasionally fly above the level of the forest canopy. Considering spotted owl flight behavior, above-canopy flights are most likely to occur in steep-walled valley settings, where the spotted owl may choose to fly across a valley above the level of the forest canopy on the valley floor. The Whistling Ridge site is located on a forested ridge top that will be maintained as a cleared area for the wind turbines. Spotted owls dispersing across the ridge are more likely to disperse through forested areas along the perimeter of the site, rather than crossing the open areas near the turbines. If a spotted owl were to fly through the turbine array, it would most likely cross at an altitude that is at or below the level of the adjacent forest canopy, and well below the height of the lower of the wind turbine blades (164 – 425 ft. above ground level).

To assess the risk of owl collision with the turbine blades or towers, we convened a review panel of three spotted owl biologists from this office and one spotted owl biologist from the Washington Department of Fish and Wildlife. Based on our knowledge of spotted owl flight behaviors and habitat preferences, the group concluded that the risk of spotted owl collisions with turbines at this site is low.

Considering the strong association of spotted owls with the forest canopy, and spotted owl flight behaviors, we conclude that it is unlikely that spotted owls would cross the Whistling Ridge site at an altitude that would put the owls at risk of collision with turbine blades. Therefore, the risk of a spotted owl collision at this site is considered to be discountable.

Concurrence

Considering the current status of spotted owls in the Project area, and the anticipated Project effects, we concur that the Project is not likely to adversely affect the spotted owl.

This concludes informal consultation pursuant to the regulations implementing the ESA (50 CFR 402.13). This action should be re-analyzed if new information reveals effects of the action that may affect listed species or designated critical habitat in a manner or to an extent not considered in this consultation; if the action is subsequently modified in a manner that causes an effect to a listed species or designated critical habitat that was not considered in this consultation; and/or, if a new species or critical habitat is designated that may be affected by this Project.

Other Comments

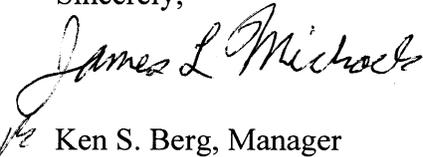
While reading through the DEIS for this Project, we found some issues that require your attention. On Page 4-4, first paragraph, last sentence "As described in Section 3.4 Biological Resources, no listed species or critical habitat are anticipated to be affected by the Project. This statement equates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

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

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

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

Sincerely,



Ken S. Berg, Manager
Washington Fish and Wildlife Office

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