

EFSEC Whistling Ridge Energy Project

Scoping Report

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1 Introduction

Background

On March 10, 2009 Whistling Ridge Wind Energy LLC, a Washington limited liability company, submitted an Application for Site Certification to the Washington State Energy Facility Site Evaluation Council (EFSEC or Council) to construct and operate a wind power generation facility on a 1,152 acre site located approximately seven miles northwest of the City of White Salmon in unincorporated Skamania County, Washington.

The project, known as the Whistling Ridge Energy Project (Project), would consist of up to fifty 1.2- to 2.5-megawatt (MW) wind turbines with a maximum generating capacity of 75 MW. Additional project components include an operation and maintenance facility, underground electric collector lines and systems, 2.4 miles of new roads, and upgrades to 7.2 miles of existing roads. The total area affected by temporary and permanent development would be approximately 114.3 acres.

The proposed Project would include a new substation and associated transmission intertie lines that would connect to the Bonneville Power Administration's (BPA's) North Bonneville to Midway 230-kV transmission line, which crosses the southern portion of the Project site. The new electrical interconnection to BPA would provide access to the regional transmission grid for sales to the wholesale electric market. The proposed interconnection is a federal action, which would require a contract with BPA.

Environmental Review

EFSEC has assumed lead agency status for the Whistling Ridge Energy Project under WAC 197-11-938 of the State Environmental Policy Act (SEPA) rules for the environmental review. EFSEC has determined that this proposal would likely have a significant adverse impact on the environment. Therefore, an Environmental Impact Statement (EIS) is required and will be prepared pursuant to RCW 43.21C.030(2)(c). Because of the interconnection with the BPA transmission system a review under the National Environmental Policy Act (NEPA) is also required. EFSEC and BPA have agreed to conduct cooperative SEPA/NEPA review and will jointly issue the EIS.

Scoping

EFSEC issued an initial Determination of Significance (DS) and public notice for the EIS scoping process on April 6, 2009. On April 21, 2009 EFSEC reissued the DS and public scoping notice adding a second scoping meeting and extending the deadline for receiving written scoping comments from May 11, 2009 to May 18, 2009. Copies of both notices are included in Appendix A.

Environmental issues to be evaluated in the EIS are indicated by concerns raised in scoping. Scoping comments broadly indicate, but do not prescribe, areas that should be considered for evaluation in the EIS. The interdisciplinary team (IDT) preparing the EIS will weigh the science basis for concerns raised in scoping, particularly in areas of major or widely shared concern. The IDT will develop criteria for rating effects, considering their context, intensity, magnitude and

duration. Based on these considerations, mitigation to reduce impacts will be identified by the IDT. Key environmental issues identified in scoping are summarized in Tables 1 and 2.

2 Agency Scoping Meeting

As part of the scoping process, an agency scoping meeting was held at the Rock Creek Center in Stevenson, Washington during the afternoon of May 6, 2009. Although a list of attendees was not available, it is estimated that approximately 20 people attended the meeting including representatives from EFSEC, the BPA, the U.S. Forest Service, the State Attorney General's office (i.e. the Counsel for the Environment) and the general public. Notes from the agency scoping meeting are included in Appendix B.

The primary agency comments received during the agency scoping meeting were provided by the U.S. Forest Service. The Forest Service made the following comments regarding the proposed Whistling Ridge Energy Project, including several suggestions for preparing the Draft EIS:

- The proposed project will have a significant visual impact on the Columbia River Gorge National Scenic Area and its protected natural, scenic, recreational, and cultural resources.
- The methodology used to portray the visual impacts of the project in the application to EFSEC is not adequate and does not focus on high value resources.
- The visual simulations in the Draft EIS need to depict views representative of both daytime and nighttime conditions.
- While supportive of wind energy projects in general, the Service is very concerned about how to solve the tension between impacts and benefits from the Whistling Ridge Energy Project.
- EFSEC should determine which of the proposed towers will be most visible from the National Scenic Area and direct the applicant to relocate the towers or eliminate them from the proposal to avoid visual impacts.
- The final product of the visual impact analysis should present a solution that mitigates for the anticipated visual impacts.

3 Public Scoping Meetings

EFSEC and BPA conducted joint SEPA/NEPA public scoping meetings during the evening of May 6, and the afternoon of May 7, 2009. The May 6, 2009 meeting was held at the Rock Creek Center in Stevenson, Washington and the May 7, 2009 meeting was held at the Underwood Community Center in Underwood, Washington. During both meetings, representatives of Whistling Ridge Wind Energy LLC provided an overview of the project and responded to questions from the audience. EFSEC staff explained the purpose of the public scoping meeting and the roles of EFSEC and BPA during the environmental review process. A total of 122 people attended the two meetings and 79 speakers provided verbal comments. Table 1 provides a summary of the verbal comments received at the scoping meetings. Copies of the official transcripts are included in Appendix C.

Table 1. Summary of Verbal Comments Received During Public Scoping Meetings

Issue	SEPA/NEPA Topic	Number of Comments	Description
General Comments	General Comments	33	<ul style="list-style-type: none"> • 3 comments encouraged further regulatory oversight and inspections, including: <ul style="list-style-type: none"> ○ Improved regional oversight and coordinated planning for wind energy facilities in the Northwest and nationally. ○ Development of standard guidelines for wind energy development. ○ Enhanced role for DNR in the planning process. • 16 comments pertained to the EIS organization, preparation, and procedures. Commenters expressed strong objections to the applicant-prepared EIS and questioned the objectiveness of the EIS preparer. Recommendations included use of third-party researchers, EIS preparers, and reviewers. Commenters also expressed concern about exclusions, errors, and inaccuracies related to the photo simulations and other portions of the application for EFSEC site certification. • 9 comments expressed general and overall support for the project. • 4 comments expressed general and overall disagreement with the project. • 1 comment was general in nature, but was not specific to scoping the EIS document.
Siting/Location	Range of Reasonable Alternatives	17	<ul style="list-style-type: none"> • 15 comments expressed a strong objection to the proposed site and suggested that an alternative site, particularly one in Eastern Washington, be found. Some commenters expressed concern about developing wind facilities on forested mountain top sites. Many of the comments expressed support for wind energy in general, but disagreement with developing this project at the proposed location. • 2 comments expressed approval of the proposed project location.
Cultural Resources	Historic and Cultural Preservation	2	<ul style="list-style-type: none"> • Tribal members spoke in favor of the project and noted that no important cultural resources are known to be located on the Project site.
Toxics and Chemical Contamination	Environmental Health	1	<ul style="list-style-type: none"> • One comment reported not being concerned about potential chemical contamination from the project.
Energy Generation	Energy and Natural Resources	24	<ul style="list-style-type: none"> • 21 comments related to wind power generation. These comments included: <ul style="list-style-type: none"> ○ Concerns about the reliability or intermittency of wind power. ○ Concerns about market demand, or lack thereof, for new wind power facilities. ○ Questions about power storage requirements for the proposed facility. ○ Objections to developing back-up power generation facilities, particularly if those facilities would be based on conventional fuels. ○ Concerns about the ability of the existing grid to support this new power input, including positive comments about the proximity of the project to existing BPA facilities. ○ Concern over whether the potential benefits of the project would be realized by the local community and if the project would provide backup power to the local PUD. ○ Concerns about eventual power shortages if projects like Whistling Ridge are not installed now. ○ Concern about the rush to install alternative energy sources and the lack of existing research regarding impacts. • 3 comments questioned the ability of the site to produce good, reliable power due to the intermittency and unreliability of winds at the site.

Table 1. Summary of Verbal Comments Received During Public Scoping Meetings

Issue	SEPA/NEPA Topic	Number of Comments	Description
Emergency Response	Public Services and Utilities	4	<ul style="list-style-type: none"> Comments addressed the potential for increased wildfire risk due to project operation, concerns about the availability of water to fight fires and the effect construction activities might have on emergency response times. Concerns were also raised about costs that might be incurred by Underwood residents for emergency response needed at the project at the site.
Fish and Wildlife	Plants and Animals	18	<ul style="list-style-type: none"> 1 comment noted that environmental impacts would be limited because Northern Spotted Owls are not present on the site. 4 objections to the project were based on the existence of threatened, endangered or sensitive species or their habitat at the project site, particularly Northern Spotted Owl. 13 objections to the project were based on general fish and wildlife concerns, including loss of forest habitat (large trees, edge habitat), impacts on forest carnivores, bird migration, and general bird and bat mortality. General impacts to forested habitat were considered severe by many commenters because of the scale of wind generation facilities.
Land Use Consistency	Land and Shoreline Use	5	<ul style="list-style-type: none"> 1 comment expressed support for the project because the project would be located on private land and would be consistent with local land use requirements. 4 comments objected to the scale of the project and mentioned inconsistencies with local zoning and concerns regarding the neighboring National Forest.
Air and Noise	Air and Noise	16	<ul style="list-style-type: none"> 8 comments objected to noise impacts on people, residences, and animals, including audible, subsonic, and vibration effects. These comments suggested that additional studies needed to be conducted concerning vibration, "Wind Turbine Syndrome," and other related effects. 2 comments noted that there is little noise emitted from the turbine towers and that noise is not a major concern. 3 comments expressed concern about air quality impacts from project construction (trucks) and project operations (fossil fuel back-up generators). 3 noise related comments were specifically related to setback requirements from residential areas.
Recreational Resources	Parks and Recreation	1	<ul style="list-style-type: none"> One local resident was interested in the project site remaining open to the public for recreation (i.e. hiking).

Table 1. Summary of Verbal Comments Received During Public Scoping Meetings

Issue	SEPA/NEPA Topic	Number of Comments	Description
Socioeconomics	Land Use, Population, Housing, Social Elements, Economics	59	<ul style="list-style-type: none"> • 15 comments noted potential negative socioeconomic impacts to the area, particularly to the growing tourism and agri-tourism economy and the area's overall economic health. • 2 comments stated that the project would have a neutral impact on the area's tourism economy. • 5 comments raised concerns and questions about the potential negative effect of the project on residential property values. • 6 comments expressed concern about the general cost/benefit of the project. Doubts were expressed that the potential for jobs, economic gain, and the need for wind energy is enough to outweigh the environmental and social costs of the project. • 1 comment accepted the short term sacrifices that would be needed during construction in exchange for the long term benefits of the project. • 4 comments were in support of the project because of the permanent and temporary jobs it would create. • 6 comments were concerned with the impacts of the project on general human health and welfare. Concerns included potential residential displacement and redirection of predator animals into residential areas. Concerns were also raised about the general effect of the project on the enjoyment of life and property. One commenter expressed support for the project related to these issues. • 10 comments objected to the project based on the relatively small benefit the county tax base would receive from the project and concerns that the project would have a general negative economic impact on the county. Concerns were also mentioned about the possible reduction in harvestable timber lands as a result of the project. • 9 comments stated support for the economic benefits the county would realize from the project. Commenters cited the importance of approving this project because of the relative lack of opportunity for the county tax base to grow due to the large proportion of public lands in Skamania County.
Soil and Geology	Geology and Soils	1	<ul style="list-style-type: none"> • 1 comment raised concerns about geological instability of steep slopes in the project area.
Surface Water	Surface Water	11	<ul style="list-style-type: none"> • 10 comments were concerned with impacts to surface water and water resources. Specific concerns were raised about possible impacts on local watersheds and surface waters, including the White Salmon River, Little White Salmon River, Buck Creek, as well as several unnamed and unmapped waterbodies. Concerns were also raised about the quantity and source of water needed for the project. • 1 comment noted support for SDS Lumber Company's ability to supply water to the project site.
Traffic and Transportation	Transportation	14	<ul style="list-style-type: none"> • 3 comments raised concerns about impacts to roads and access roads, including potential road widening, increased traffic and travel times, and oversized vehicles that would exceed road weight limits. Two of the comments expressed objection while one expressed support for the project because most of the access roads already exist. • 3 comments were concerned about traffic safety during construction. • 4 comments expressed concerns that needed road improvement might require new right-of-way from private property owners.

Table 1. Summary of Verbal Comments Received During Public Scoping Meetings

Issue	SEPA/NEPA Topic	Number of Comments	Description
Visual Resources	Aesthetics	49	<ul style="list-style-type: none"> • 38 comments objected to the project based on visual impacts and non-compliance with Columbia River National Scenic Area Act. Commenters suggested removal of the “A” towers and to make the project less visible from Key Viewing Areas within the Scenic Area. Others noted the inconsistency of the project with the spirit of the National Scenic Act. Commenters also pointed out the sacrifices other landowners have made for compliance with the National Scenic Act. Several commenters were concerned about the scale of the towers in relation to other structures in the area. • 8 comments expressed support of the project in light of the Scenic Act and/or visual resources of the area. • 3 comments noted objection to the project based on nighttime-specific visual impacts from the flashing FAA warning lights.
Mitigation	Mitigation	5	<ul style="list-style-type: none"> • 5 comments noted the strong need for mitigation of the negative visual and aesthetic effects from the project. Commenters cited the need for removal of the “A” towers to reduce aesthetic impacts and development of a visual quality mitigation plan.
Cumulative Effects	Secondary and Cumulative Impacts	11	<ul style="list-style-type: none"> • 5 comments were concerned with cumulative effects and stressed the importance of including a cumulative effects analysis in the EIS and the application. • 6 comments were concerned with the cumulative effects (socioeconomic, human health and welfare, environmental, all) of existing and proposed wind projects in the Columbia River Gorge and the Northwest. These concerns were with both long-term and short-term effects.
Total Verbal Comments		271	

4 Project Site Tour

On the morning of May 7, 2009, EFSEC council members and staff participated in a tour of the Project site. The purpose of the tour was to view the proposed site, the proposed location of facilities on the site, and the areas immediately surrounding the site. The site tour was open to the public, provided they could arrange their own transportation. Communication between EFSEC council members, staff, and the public was limited to discussion of the site and proposed facilities to avoid the possibility of *ex parte* communications that could violate EFSEC rules pertaining to future adjudicative proceedings. Although a list of participants was not available, it is estimated that approximately 25 people attended the site tour.

5 Land Use Consistency Hearing

EFSEC conducted a formal Land Use Consistency Hearing on the evening of May 7, 2009 at the Underwood Community Center. WAC 463 requires EFSEC to conduct a public land-use hearing to determine if the project is consistent with local land use plans and regulations. The Land Use Consistency Hearing is a formal process during which EFSEC considers evidence submitted by the applicant to determine whether the proposed project is consistent with local land-use plans and regulations. During the hearing other parties may submit information in support or opposition to the proposed project. Although not part of the official scoping process, the transcript from the Land Use Consistency Hearing is included in Appendix D.

6 Written Comments Received During the Scoping Period

In addition to the opportunity to provide verbal comments at the scoping meetings, agencies and the public were invited to submit written comments on the scope of the EIS to EFSEC or BPA. Comments were submitted by mail, e-mail, and on-line (using the EFSEC and BPA websites). At the close of the comment period, 421 letters or e-mails had been received from governmental agencies, environmental organizations, and interested citizens. A total of 1,854 individual comments were identified and coded to allow analysis of key environmental concerns. Fifty-one of the 421 letters were duplicate letters or cover letters/e-mails attached to supporting documentation that did not include substantive comments. The remaining 1,803 comments, grouped by issue, are summarized in Table 2. A detailed summary of the comments received is presented in Appendix E.

Individual comment letters were received from the following agencies and interested tribes:

- U.S. Environmental Protection Agency – Region 10
- U.S. Department of Agriculture – Forest Service
- U.S. Department of Agriculture – Forest Service, Columbia River Gorge National Scenic Area
- National Park Service
- Washington Department of Ecology
- Washington Department of Fish and Wildlife
- Washington State Office of the Attorney General – Counsel for the Environment
- Department of Community, Trade and Economic Development (now named the Department of Commerce)
- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of the Umatilla Indian Reservation
- Cowlitz Indian Tribe

Table 2. Summary of Written Comments Received During the Scoping Period

Issue	SEPA/NEPA Topic	Number of Comments	Description
General Comments	General Comments	75	<ul style="list-style-type: none"> • 23 comments raised objections about the planning process, including dissatisfaction with the degree of regulatory oversight. These included objections to the location of the May 6, 2009 scoping meeting in Stevenson, the notice for hearings, and the time allotted for the meetings. Commenters also expressed dissatisfaction with the makeup of the EFSEC review committee based on concerns over committee member's objectivity and past affiliations. Commenters made recommendations for agency consultation. Concerns were also raised about not including future phases of the project in the current application. Concerns were also mentioned about the environmental compliance record of the project proponent (SDS Lumber Company). • 20 comments cited objections or recommendations regarding EIS content and procedures. Objections were made to the applicant-prepared nature of the EIS and questions were asked regarding objectiveness of the EIS preparer. Recommendations were made for use of third-party researchers, EIS preparers, and reviewers. Concerns were raised about using applicant prepared research. Objections and recommendations were also made regarding exclusions, errors, inaccurate photo representations, and other inadequacies with the application for site certification. • 15 favorable comments expressed general and overall approval of the project. • 8 comments expressed general and overall disapproval of the project. • 9 comments were general in nature, but were not specific to scoping the EIS document.
Siting/Location	Range of Reasonable Alternatives	31	<ul style="list-style-type: none"> • All 31 comments objected to the proposed project location and suggested there were more suitable sites located in the plains of Eastern WA. Commenters felt those sites should be considered before a forested site in the Columbia River Gorge or a site near a residential area is used for a wind energy project. Commenters noted that developing the project on an alternative site could reduce visual, socioeconomic, and wildlife impacts. • Many of the comments expressed support for wind energy in general, but disagreed with locating the project in the Columbia River Gorge. • Recommendations were made to include a "no action" alternative in the EIS.
Cultural Resources	Historic and Cultural Preservation	12	<ul style="list-style-type: none"> • 11 comments expressed concerns over protecting the cultural resources of the area. These comments noted the need for tribal consultations, cultural resources surveys, and archaeological surveys. • 1 comment expressed concern that cultural resources would be lost if the project was allowed to go forward.
Toxics and Chemical Contamination	Environmental Health	8	<ul style="list-style-type: none"> • 8 comments raised concerns about chemical exposure related to construction and/or operation of the project. • 3 of these comments raised concerns over the use of pesticides and herbicides. • 3 others cited objections and concerns over polluted runoff entering nearby waterways.

Table 2. Summary of Written Comments Received During the Scoping Period

Issue	SEPA/NEPA Topic	Number of Comments	Description
Energy Generation	Energy and Natural Resources	28	<ul style="list-style-type: none"> • 11 comments expressed concern about the general reliability of wind power, the need for power storage and backup (fossil fuel powered) electric generation facilities when the wind is not blowing, and concern about the ability of the existing grid to support this new power input. • 13 comments approved of the project based on energy generation benefits and the general need for wind power. Rationale included the need for alternative energy sources, proximity to existing BPA transmission lines, and potential benefits to the local community in the form of backup power for the local PUD. • 2 comments questioned the ability of the site to produce good, reliable power due to the intermittency or unreliability of winds at the proposed site. • 2 comments favored the site as an appropriate location due to its ability to produce reliable wind power and its proximity to existing BPA transmission lines.
Environmental Impacts – General	Natural Environment and Built Environment	246	<ul style="list-style-type: none"> • 241 comments objected to the project based on general environmental impacts, including impacts to forests, biology, views, noise, and other issues. These comments were general in nature and could not be easily sorted into specific environmental concerns. Commenters also raised concerns that approving the proposed project would set a precedent that would encourage other wind power projects to locate in the scenic and forested areas of the Gorge. • 5 comments approved of the project stating that general environmental impacts are not a concern.
Emergency Response	Public Services and Utilities	12	<ul style="list-style-type: none"> • 8 comments objected to the project based on concerns over increased wildfire risk due to project operation, impacts on emergency response times from construction traffic and congestion, and the ability of the local emergency response providers to service the project area during construction and operation. • 3 comments asked about the arrangements that would be made to accommodate emergency response during construction and operation. • 1 statement of support was received from a local fire district citing their ability to respond to emergencies in the area.

Table 2. Summary of Written Comments Received During the Scoping Period

Issue	SEPA/NEPA Topic	Number of Comments	Description
Fish and Wildlife	Plants and Animals	332	<ul style="list-style-type: none"> • 33 comments objecting to the project were related to the presence of threatened, endangered or sensitive species or their habitat at the project site. Specific species mentioned include: Northern Spotted Owl, Northern Goshawk, Townsend's big eared bat, western gray squirrel, salmonids, and bald eagle. • 1 comment stated support for the project as long as environmental studies were conducted and project effects on threatened or endangered species were minimized. • 295 comments objected to the project based on fish and wildlife concerns, including destruction of forest habitat (multi-layered canopy, large trees, edge habitat), disruption of habitat for forest carnivores, disruption of and/or creation of new migration/travel routes (mammals and birds), watershed degradation, and general bird and bat mortality. Concerns were also expressed about the project's potential to encourage wildlife to move into residential areas. Other commenters were concerned about the project's effects on local and downstream waterways. There was a general concern over the lack of knowledge about the effects of wind generation facilities on birds and bats in forested areas and about the adequacy of current bat, bird, and plant surveys related to the site. The introduction of invasive species was also a concern. • 2 comments requested inclusion of studies of particular forest qualities in the EIS, including native plants, forest habitat qualities and species that inhabit the forest habitat. • 1 commenter approved of the project citing that deer often graze under the turbines and that overall the project would not have a negative impact on wildlife.
Land Use Consistency	Land and Shoreline Use	22	<ul style="list-style-type: none"> • 18 comments objected to the project based on inconsistency with currently zoning ("not zoned for industrial use"). Additional concerns included: consistency of allowing 400+ foot tall towers adjacent to residential land, concerns that wind generation facilities are not consistent with the Skamania County Comprehensive Plan, concern about the consistency of the project with Underwood's Rural Area Plan, and specific concerns about the location of the "A" towers on the site. • 1 comment requested more detailed project location information because a natural gas pipeline may be located near the project site. • 1 comment asked how the proposed project might affect the flight paths of military jets from Whidbey Island that use the area for training missions. • 2 comments were in favor of the project location based on land use consistency.
Air and Noise	Air and Noise	47	<ul style="list-style-type: none"> • 23 comments objected to the project based on noise impacts to people, residences, and animals. Concerns were raised over current regulatory standards and possible audible, subsonic, and vibration effects from turbine operation. Comments also cited a need for further study of the behavior of sound in mountainous terrain. • 5 comments favored project approval and expressed a general lack of concern for noise impacts. • 12 comments noted possible air quality impacts from project construction (truck, barge, and rail traffic) and project operations (conventional fuel back-up generators). • 7 comments were related to setback requirements from residential areas to mitigate noise impacts. Recommended setbacks ranged from 1 to 2 miles. There was concern that the currently proposed ½ mile setbacks would be inadequate.

Table 2. Summary of Written Comments Received During the Scoping Period

Issue	SEPA/NEPA Topic	Number of Comments	Description
Recreational Resources	Parks and Recreation	2	<ul style="list-style-type: none"> 2 comments expressed concern that the project would effect ongoing recreation activities on the site, including: hunting, hiking (Whistling Ridge trail) and mushroom picking.
Socioeconomics	Land Use, Population, Housing, Social Elements, Economics	63	<ul style="list-style-type: none"> 16 comments noted potential negative socioeconomic impacts to the area, particularly to the growing tourism and agri-tourism economy and the area's overall economic health. 1 comment noted that the EIS should include an assessment of the compatibility of the project with current forestry operations. 2 comments countered the opinion that tourism would be negatively affected by the project, stating that the project instead would provide an economic boost to the area. 4 comments included objections to the project based on negative impacts to property values, both during construction and operation. 5 comments cited concerns about the general cost/benefit of the project. Commenters speculated that the job potential, economic gain, and the need for wind energy may not be enough to outweigh the environmental and social costs. One commenter did not object to the project but noted the need for public engagement during the EIS process to weigh the costs and benefits. 12 comments addressed concerns over the number of permanent and temporary jobs created by the project. Half of the comments were in favor of the project because of the jobs that would be created, while the other half opposed the project because the number of jobs was insufficient to justify the project. 8 comments objected to the project based on impacts on general human health and welfare (including the potential for residential displacement) and general enjoyment of life and property. One comment noted that the ½ mile setback would be adequate to protect the public from ice throw from the turning blades. 4 comments cited doubts that the County would receive a positive financial gain from the project. 11 comments stated support for the project because of the boost it would provide to the county tax base and the generally positive economic impact of the project on Skamania County. These comments voiced strong support for the project in light of the limited opportunity for the county tax base to grow due to the large proportion of public lands in the county.
Soil and Geology	Geology and Soils	9	<ul style="list-style-type: none"> 4 comments mentioned soil and erosion concerns, such as soil compaction, erosion, and runoff from project roads. Concerns were also raised about the effect of project-related vegetation control on erosion. 5 comments included concerns related to geology and tectonics, including questions about the stability of the site and the propensity for landslides.
Ground Water	Ground water	2	<ul style="list-style-type: none"> Concerns were also raised about groundwater effects (including the effects of soil compaction on groundwater) and whether aquifer mapping and a groundwater assessment had been completed for the project site.

Table 2. Summary of Written Comments Received During the Scoping Period

Issue	SEPA/NEPA Topic	Number of Comments	Description
Surface Water	Surface Water	24	<ul style="list-style-type: none"> • 21 comments stated concern about impacts to surface water and water resources. Concerns included the potential effects of the project on local watersheds and surface waters, including the White Salmon River, Little White Salmon River, Buck Creek, as well as several unnamed and unmapped waterbodies. Several comments mentioned concerns about the quantity and source of water needed for the project. • 9 comments addressed the regulatory requirements for surface waters and nonpoint source pollution that the project would be required to meet. • 3 comments raised concerns about wetland and floodplain impacts as well as mitigation for these impacts. One comment urged consideration of impacts to the “Cedar Swamp” wetland.
Traffic and Transportation	Transportation	31	<ul style="list-style-type: none"> • 16 comments objected to the project based on impacts to roads and access roads, including road widening, increased traffic and travel times, and concern over construction vehicles exceeding weight limits. • 1 comment requested that public health and safety impacts associated with traffic and transportation be fully disclosed in the EIS. • 1 commenter recommended that Asplund Road be used for construction access to the site instead of the current route. • 9 comments objecting to the project were based on safety concerns during project construction (i.e. safety of children on school buses, commuter traffic) and operation. Suggestions included encouraging construction traffic to avoid school bus routes and normal commuting hours. • 1 commenter who supported the project stated that traffic volumes associated with the project would not be objectionable. • 3 comments objected to condemnation or the taking of private property to accommodate road improvements needed to construct the project.
Visual Resources	Aesthetics	583	<ul style="list-style-type: none"> • 557 comments opposed the project based on visual impacts and non-compliance issues with Columbia River National Scenic Area Act. Commenters suggested removal of the “A” towers so as to make the project less visible from Key Viewing Areas within the Scenic Area. Others noted the inconsistency of the project with the spirit of the National Scenic Act. Commenters also pointed out the sacrifices other landowners have made for compliance with the National Scenic Act. Several commenters were concerned about the scale of the towers in relation to other structures in the area. • 8 comments noted the requirements of the Scenic Act and the rules associated with Key Viewing Areas. These comments asked for further analysis of viewsheds and suggested removing the “A” towers to reduce visual impacts. • 11 comments were in support of the project in light of the Scenic Act and/or visual resources of the area. • 7 comments objected to the nighttime visual impacts of the project from the flashing FAA warning lights that would be located on the top of each tower.
Mitigation	Mitigation	10	<ul style="list-style-type: none"> • 8 comments noted a need for monitoring of bird and bat mortality, and the development of mitigation, monitoring, and decommissioning plans before project approval. • One comment suggested that the developers put up a bond before construction to ensure that decommissioning will occur when needed. • One comment noted that decommissioned wind energy facilities leave no air pollution and only a minimal terrestrial footprint.

Table 2. Summary of Written Comments Received During the Scoping Period

Issue	SEPA/NEPA Topic	Number of Comments	Description
Cumulative Effects	Secondary and Cumulative Impacts	270	<ul style="list-style-type: none"> • 249 comments were concerned with cumulative effects and stressed the importance of including a cumulative effects analysis in the EIS and the application. Comments noted that possible future expansion of the project should be included in the EIS and the EFSEC application. • 20 comments were concerned with the cumulative effects (socioeconomic, human health and welfare, environmental, etc.) of existing and proposed wind projects in the Columbia River Gorge and the Northwest. These concerns were with both long-term and short-term effects. Comments also expressed the importance of consideration of both direct and indirect effects of the project.
Total Written Comments		1803	