

Keith Brown, Ph.D. and Teresa Robbins

211 Malfait Tracts Road
Washougal, WA 98671

Energy Facility Site Evaluation Council

621 Woodland Square Loop^[SEP]

PO Box 43172^[SEP]

Lacey, WA 98503-3172

May 16, 2024

Dear Council Members:

Most (if not all) of you were **not** a part of the EFSEC Council in 2009. Therefore, you were not present to hear the overwhelming, widespread community opposition to what was known as the Whistling Ridge Energy (WRE) proposal. The proposal was to put 426 feet high industrial wind turbines atop ridges just outside the Columbia River Gorge National Scenic Area, looming over the Underwood, Mill A, White Salmon, Bingen, Hood River, and Mosier residential areas in the gorge.

You should have scheduled this hearing in the Underwood Community Center, where you would have heard from the affected community first-hand. You first scheduled a virtual only hearing, and then just at the last minute, made it hybrid...requiring the public to travel to Lacey if they wanted to address you in person. Had you conducted this hearing on transferring ownership and extension of the ten-year time frame to start WRE construction in Underwood, you would likely have heard the same level of concerns and objections, as was heard in 2009. To give you some idea, we have provided a summary and a selection of comments from that scoping process.

Overwhelming Majority Express Concern during WRE scoping process...

From the comments provided to EFSEC by concerned citizens during the process to ascertain the scope and potential environmental impact of this proposed project:

Of the 363 separate written comments from individuals and organizations expressing an opinion, the overwhelming majority, **336** raised concerns and/or objections (**93%**), while only **27** expressed some form of support (**7%**). (The number 363 excludes duplicate comments from the same individual, legal arguments from the land use consistency hearing, simple requests for information, or stated neutrality at this point.)

Unfortunately, you can no longer review the comments on the EFSEC website for yourself, as the link has been removed. To illustrate the depth and breadth of concern regarding this proposed project, a sampling of quotes from the submitted comments follows.

QUOTES

“Desecrating the views will discourage visitors and the tourist revenue that benefits the region.... You would not build a wind generator farm on Half Dome in Yosemite, Mt. Rainier, or along the rim of Crater Lake. In like vein, you should not build one in or near the Gorge.” #163 *Tom Rousseau, Hood River*

“I know first hand the threat a wind farm can have to significant landscapes. First Wind withdrew it’s application this past winter to place 40 turbines on Seven Mile after a significant battle waged by residents to protect the livability, wildlife and the protected Scenic Area. ... start taking responsibility and leadership for only allowing turbines in areas that do not ruin scenic vistas that will be forever impacted for future generations... understand that you represent a collective of national and international residents and visitors to the Gorge, and that you must not allow the encroachment of an industrial facility stretching over thousands of acres to wreck that.” #196 *Betsy Hege, The Dalles*

“The communities of Underwood, White Salmon and Bingen are much more closely tied to the success of Hood River than that of Skamania County as a whole. This area is a shiny jewel that should not be tarnished with such carelessness. It is both a state and national treasure.” #347 *Chis Lloyd, Underwood*

“The livelihoods of thousands of families in the Gorge are tied to the tourist industry, which is tied inextricably to our beautiful scenery and breathtaking views. These turbines would forever mar the landscape, views, and quality of life in the Gorge.” #275 *Laila and Jim Tedford, Hood River*

“I just happened to have taken one of the most beautiful hikes I can remember on the Washington side of the Gorge this last weekend. ...some of the most beautiful and well preserved land in the country. ...unblemished area available to the public and I feel lucky as a 30 something to still have access to a pristine Columbia River Gorge Scenic Area. ...I would hate to say it was my generation that ruined this beauty and sensitive habitat for a new energy project with so many wind turbines...I am opposed...” #64 *Ann Colonna, Portland*

“Proximity to numerous residential areas, water use issues, visual impacts from both turbines and navigation lighting, potential negative impacts for local agri-business and property values – these are just some of the many important reasons... which question the wisdom of siting a major energy project of this magnitude in this area. ... scenic area... boundaries were drawn with the reasonable assumption that dozens of skyscraper-height structures would not be built in the middle of the forest. This project may meet the letter of the law, but would certainly break the spirit of the Scenic Act.” #335 *Matthew J. Ryan, Underwood*

“The viewshed from both the river and auto tour routes is a critical part of the visitor experience. In addition to the national historic trails, the visual quality of the region is specifically protected by designation of the Columbia Gorge National Scenic Area (CGNSA) in 1986. These three national resources are independently significant, but the close proximity of all

three to each other creates a unique recreational opportunity for visitors to the region. It is important for NPS to ensure that the scenic and historic values of these areas are preserved from gross alteration of the landscape and viewshed by large-scale industrial development.” #BPA -3 Rory D. Westberg, Deputy Regional Director, National Park Service, US Dept of the Interior, Seattle

“This wind farm should not be approved just based on its proximity to Northern Spotted Owl Emphasis Areas (SOSEA).” #268 Tom Gauron, President, Beth Rogers Conservation Committee, Kittitas Audubon, Ellensburg

“... planning ... emphasized the importance of dispersing wind power projects throughout the Northwest in order to limit the environmental impacts to any one area... Just the opposite has happened... A vast majority of the projects have been sited along the Columbia River Gorge and surrounding Columbia Plateau. This focuses the environmental impacts of wind power on a very sensitive area for birds: the cross roads of the Pacific Flyway and the east-west flyway used by birds for easy passage through the Cascade Range.... So far, the two words that best describes Northwest wind power siting are: Huge Mistake.” #293 Tom Thies, President, Columbia River Gorge Audubon Society, White Salmon

“... It should be obvious to all concerned that a commercial wind energy project is *not* appropriate for habitat that is designated as a nesting, roosting and foraging area for a federally endangered species. ... Before we rush into another costly venture requiring major transmission infrastructure, it’s time to look at what other power sources would be required to support wind power development in our area. ... Those of us who live here have worked long and hard, and may have made personal sacrifices, in order to preserve the scenic value of these lands for all to enjoy. It would not be right for one company to destroy those values purely for its own commercial benefit. ...The current gold rush to construct wind projects is reminiscent of last century’s love affair with hydropower. We now know that dams provide clean energy but also take a heavy toll on salmon and other species. This time around, we cannot afford to rush headlong into “green” energy development....” #369 Dawn Stover, White Salmon

“...I am an audiologist and am aware of how sound can affect our health.... I have found enough information from research that we need to really look into the effects of noise on human health... vibro-acoustical disease.” #173 Amy Rosenthal, Portland

“... we have always known we would be affected by various rural activities such as agriculture and timber operations, we never anticipated that a major industrial activity like a wind farms could be located so near to us.... We have grave concerns about several possible adverse effects of the project... fear that noise from the Project will be a constant nuisance whenever our windows are open, or when we are outside our homes... Some of the strongest complaints about wind turbine noise are due to the low-frequency sounds – a constant “whumping” similar to the bass beat that can be heard (and felt) from certain car stereos... due to this Project’s location in a forest ecosystem, far more wildlife will be negatively affected or harmed than if it were located in a wheatfield or open plain environment. ...Given that there are abundant optional locations for this type of project, we cannot support this Project until there is

conclusive documentation that it will not have “adverse effects” on our lives and our environment.” #326 *Board of Directors, Northwestern Lake Development Homeowners’ Association, White Salmon*

“Ridge top windpower facilities, such as Whistling Ridge, are tantamount to mountain top coal mining: ridge tops are leveled and permanently stripped of vegetation, sending sedimentation, lubricating fluids, tower cleaning fluids as well as herbicides and pesticides used to control competing vegetation and unwanted wildlife into down-slope water systems. These are very real and serious consequences of ridge top wind mining.” #132 *Jill Barker, Conservation Chair, Columbia Audubon Society, Mosier*

“The project would permanently disturb large areas of forested habitat and result in direct and indirect impacts to multiple wildlife species through habitat loss and displacement, direct collisions with turbine blades, and other factors. ... Several of these species are listed as sensitive or threatened in Washington State. ...The project would introduce highly visible industrial facilities into the natural, forested landscape, protruding above ridgelines and detracting from the natural scenic beauty of the Gorge. ... This proposal to construct and use Scenic Area lands for industrial purposes is prohibited by the National Scenic Area Act and Management Plan, and must be denied.” #29 *Karen Lee, Underwood*

“I am very concerned about potential conclusions from an EIS where the fundamental data derived for analysis is prepared by the applicant. I have concerns that too much temptation exists to create data which favors a specific outcome.” #331 *Loreley Drach, Underwood*

“... we find the SDS methodology lacking in important aspects that are recommended by the acoustical experts. ... Reiterating, we feel it crucial that all ambient sound monitoring, simulation and projection be conducted by an Independent Qualified Acoustical Consultant... Simply using current and possibly outdated industry practices given the mounting evidence of health implications is insufficient in protecting the citizens of our state, and we fear could border on negligence.” #233 *Keith Brown, Teresa Robbins, Washougal/Skamania County*

We were notified of these hearings on the transfer and extension only because last fall, we happened upon a small article about an October 2023 EFSEC hearing on Whistling Ridge in the Skamania Pioneer newspaper. Although we have been intricately involved in all of the Whistling Ridge hearings and adjudicative processes during 2009 through 2011, we had not been notified of the October 2023 hearing either by mail or email (we have the same physical and email addresses we had in 2009). We then contacted EFSEC staff to find out how it was that we were not notified and were told to sign up again for notifications. (What happened to our long-standing request to be notified about anything WRE? Was it simply misplaced? Or disregarded?) This creates a serious question. How many of the hundreds of concerned citizens that participated and commented on the WRE proposal in 2009 through 2011 were not informed about this 2024 hearing on the requested permit transfer and time extension? Therefore, they have lost the opportunity to comment. **EFSEC staff should be ashamed for failing to notify**

all of the previously engaged and concerned citizenry...both by email and mail. These hearings do not meet the spirit nor the letter of what is required to ensure full citizen participation in the process.

WRE has failed in its attempts to construct industrial wind turbines in this location for going on 22 years. In 2002, WRE requested from the Bonneville Power Administration (BPA) a 70-MW generation interconnection to BPA's energy grid for a new wind energy project. In 2007, WRE proposed to build up to 85 wind turbines, each up to 426 feet tall, on prominent ridgelines near the town of White Salmon. In 2008, Skamania County proposed an industrial overlay zone throughout Skamania County, which would have allowed the construction of these wind turbines. Public hearings were held in numerous locations throughout the county, including in Mill A/Underwood. We attended all of these hearings and there was widespread and overwhelming opposition and concerns about the environmental impacts. Despite these well-articulated concerns, Skamania County issued a Determination of Non-Significance, which was appealed by several non-governmental and non-profit organizations in October 2008. In February 2009, the Hearings Examiner reversed the determination of non-significance and required Skamania County to prepare an Environmental Impact Statement (EIS). The county declined to conduct the EIS and directed the project proponent for WRE to seek approval from EFSEC. In 2009, the Washington Department of Natural Resources rejected WRE's request to build wind turbines on public land. In 2012, state officials reduced the proposed Whistling Ridge Energy Project to no more than 35 wind turbines (down from the original proposal of 85 turbines). At that point, the original project applicant, Whistling Ridge Energy, LLC (WRE), announced that the project was on hold and "unlikely to move forward." WRE never took any steps to move forward with the project. **The permit issued for the project by Washington Governor Christine Gregoire EXPIRED ten years later, on March 5, 2022.**

On September 13, 2023, more than a year and a half after the permit expired, requests were filed with EFSEC to resurrect the expired permit, create a new expiration date of November 1, 2026, and transfer the permit to a new owner. **These requests should have been dead on arrival at EFSEC.**

We urge the EFSEC to deny the request to revive the expired permit and the transfer of the permit and the project to Twin Peaks Timber (a.k.a. Diamond Resource Company).

Proposed along the boundary of the National Scenic Area and within an area designated for the protection of the endangered Northern spotted owl, the Whistling Ridge Project would mar world-class scenery and harm endangered species habitat, with little to no benefit to state of Washington citizens.

Icons of the Pacific Northwest, like the Columbia River Gorge, Mount Rainier, and the Olympic Mountains, should be off-limits to large-scale energy development. We can combat climate change without having to sacrifice our most special places and our core values.

Quoting from our August 20, 2010 comment letter to EFSEC on the Draft EIS, which is as true today as it was 14 years ago:

"This siting, if it occurs, will set a precedent with troubling and long-standing consequences for not only forested lands in Washington, but will also put at risk all other national and state treasures, parks, and scenic areas. Must we blindly go forward and ruin all that has been set aside? Once it is gone, it is gone. Employing wisdom and forethought, if there is ever a time for EFSEC and BPA to determine **"NO, the cost is too great!"** this is it."

Finally, we leave you with a summary of all of the EFSEC written comments from the scoping through the draft EIS. As you can see, the opposition was (and we believe is) overwhelming. **We urge you to take the appropriate action and deny the request to transfer the permit and extend the time-frame for what is now an expired permit. This ill-conceived project has loomed over the Underwood , Mill A, White Salmon, Bingen, Hood River, Mosier residents and the Columbia Gorge National Scenic Area for 22 years. It is time to recognize it should be dead and buried, once and for all.**

Respectfully submitted,

Keith Brown, Ph.D.
Teresa Robbins

SUMMARY OF EFSEC WRITTEN PUBLIC COMMENTS

1299 of 1390 written comments expressed an opinion regarding Whistling Ridge Energy Project, of those:*

EXPRESSED CONCERN/OPPOSITION

1,115 or 86%

EXPRESSED SUPPORT

184 or 14%

The two most heavily cited concerns were:

VISUAL/SCENIC IMPACT

1,023 or 79%

WILDLIFE

762 or 59%

*338 of the written comments expressing an opinion came from local area residents**and mirrored the total results:*

EXPRESSED CONCERN/OPPOSITION

270 or 80%

EXPRESSED SUPPORT

68 or 20%

*TOTAL SUBMITTED TO EFSEC	1390
Duplicates	-46
Info only or Neutral	<u>-45</u>

TOTAL EXPRESSING OPINION 1299

** Underwood/Cook. Mill A, White Salmon, Bingen, Northwestern Lake, Husum in Washington and Hood River, Mosier, Parkdale in Oregon.