
From: Barbara Robinson
Sent: Wednesday, August 08, 2007 12:33 AM
To: BPA Public Involvement
Subject: Cascade Wind Interconnection Project
Attachments: Wind Tower letter,2.doc

Dear Bonneville Power Administration: I understand you are accepting comments from the public on the proposed UPC Cascade Wind Project on Sevenmile Hill. I support all the wind projects being built in the wheat fields of Eastern Washington and Oregon. The Cascade project, however is different. As I see it, this entire project is poorly sited for three reasons: 1) It will have a large adverse impact on the Columbia Gorge National Scenic Area. It will degrade the area visually, and this in turn will undermine the building regulations within the Scenic Area by making them seem hypocritical. 2) It is in or near a rural residential area which the county has zoned for rather dense rural development, and many houses will be close to and impacted by the wind towers. 3) A number of towers, roads, and other construction involved in the project will destroy or degrade excellent quality oak woodland. This habitat has a special protected status in the state of Oregon.

I sent a letter to the Oregon Dept. of Energy Facilities Siting Council focusing on the first issue, and I am attaching a copy of that letter. I also gave them some maps and photos to supplement this letter, and would like to send those to you by regular mail. (They are not in digital form.)

Sincerely,

Barbara Robinson

Comments on the UPC Sevenmile Hill Wind Tower Project
To: the Oregon Dept. of Energy Facilities Siting Council
From: Barbara Robinson

The proposed UPC project on the Sevenmile Hill ridge top within a few hundred feet of the Columbia Gorge National Scenic Area boundary will have a dramatic adverse affect on the National Scenic Area (a protected area in your standards) and a dramatic and huge adverse impact on many “key viewing areas” (protected in your scenic and aesthetic standards) in the Gorge, as defined and listed in the Management Plan for the Gorge. The 20 towers in the North Array will have the greatest impact, but all three arrays will be visible from many very scenic places. There are numerous negative features of this project, such as its proximity to a great number of residences with potential bad noise, strobe, view, and property value effects, its destruction and disturbance of high quality oak woodlands and wildlife, its placement in an area the county planning process has encouraged as higher population density rural residential, and even a possible strobe effect for the whole town of Lyle, Wa., which will see the low-lying winter sun through the blades. But I will focus on the project’s adverse impact to the National Scenic Area.

The Columbia Gorge was made a National Scenic area in order to preserve and protect views of nature and natural beauty. It was not made to preserve views of farm land, or historic buildings, or trains, though it does have those things. It was made to preserve views of the Columbia River framed by steep hills and cliffs, views of waterfalls, basalt columns and rock formations, and wildflower meadows. The Act provided two means of protection: land purchases, and strict zoning and regulation.. Anyone building a house or structure outside the town boundaries in the Scenic area has to meet strict standards of color, size, height, reflectiveness, and screening, and zoning insures a low density of houses. The whole purpose is to make structures as inconspicuous and visually “subordinate” as possible, because manmade structures including beautiful large homes are considered to have an adverse impact on the natural scenic beauty being protected. These wind towers, on the other hand, are dominant and conspicuous, and are supposed to be conspicuous so airplanes will not hit them. They are huge, moving, white, on the horizon line (the eye naturally goes to contrast lines like the horizon), and 2/3 of them will have red flashing lights at night. Also, the North Array, within a few hundred feet of the Scenic Area boundary and the ridge line, is a rather dense cluster of 20 towers. They violate every aspect of visual subordination, and are supposed to. They will be the dominant element of the view for many miles, especially when moving, because the eye naturally goes to anything moving first, even if it is small like a mosquito. There are 40 proposed now but this is phase one, and we all know if these are approved it will pave the way for many others on Sevenmile Hill and along other Gorge boundaries. The issue is not whether wind tower are beautiful or ugly. I love beautiful skyscrapers like the Wrigley Building in Chicago, but I would not want to see it on top of Sevenmile Hill. It would detract from the natural beauty of the Gorge, and so will the wind towers.

These towers are just outside the Scenic Area boundaries so the rules everyone within the Scenic area has to follow do not directly apply to them. The Forest Service and Gorge Commission have no direct authority. Yet these towers will affect the views in the Gorge much more than any house built within the Scenic Area. Not only will the towers

adversely affect the Scenic Area by affecting views, they ultimately may effect the survival of the regulations in the Scenic Act, because how reasonable is it to tell someone they cannot build a big, conspicuous white house on the side of a hill topped by or looking at huge white wind towers. If the State of Oregon allows the Columbia Gorge to be degraded, it may become an argument for allowing further degradation.

If I understand correctly, the proposed towers are about 400 ft high from base to blade tip, and if the application is approved nothing would prevent the company from using larger towers. Also, corridors are approved rather than exact placements. One of the corridors actually seems to go over the edge of Sevenmile Hill (and it is a definite, dramatic edge if you are standing next to it). The Scenic Area Boundary was drawn as a straight line here, but the ridge is not a straight line and unfortunately a little piece of the ridgeline is outside the boundary. This is where the corridor actually goes over the ridge. So a tower could be built exactly on the ridge edge if the company desired. Sevenmile Hill goes up steeply to an abrupt edge and then flattens out on top. Much of the top is wheatfield, though some of the North Array will be in good oak woodland. The zoning on top when the Scenic Area Act passed was large scale farming, 80 acre subdividable, so those drawing boundaries had no fear that the ridge would be lined with houses. No one was thinking about 400 ft wind towers in 1985.

A trail is proposed over Sevenmile Hill in the Management Plan for the Gorge, and the Forest Service has been purchasing land that would allow such a trail. The tower corridors on the ridge edge would be right where the trail should be. I would say we could still have a trail with the wind towers, but we have heard that in Maine UPC promised a trail would be reopened once the towers were built, and then closed it permanently for "safety reasons".

I will now go into detail about what Gorge view areas these towers will visually impact. First I would like to describe in detail the two closest listed key viewing areas, and then mention many other viewing areas that will be impacted.

McCall Point, the closest listed key viewing area, is one half mile away from the nearest tower. The towers will be dramatically large seen from here and will dominate the east view of the river. Right now one sees Mt. Hood, Mt. Adams, and the river, both east and west. The nearest house is about a mile away. The little town of Lyle, Wa. with no industrial structure, is seen about two miles away. McCall Point is solid wildflower meadow in spring, and is spectacular. Wind towers that close will dramatically change its character.

A mile and a half away from the nearest tower are Rowena Crest Overlook and the Tom McCall Preserve, both on the Rowena Plateau which is a listed key viewing area. Every cruise ship on the Columbia, doing week-long cruises to the Snake River, has a bus tour that goes up the Rowena Loops on the Old Scenic Hwy., where car commercials are frequently made, to the Rowena Crest Overlook. This circular viewpoint was considered the Crown Point of the East Gorge by the builders of the Hwy, and the intention was to have a Vista House type structure in the circle, but instead The Nature Conservancy has created a wildflower garden there. The view of the river looks east, and Sevenmile Hill is next to the River looking east. The top point of Sevenmile Hill is a treeless area, and a windtower will sit right there, next to the view of the river. Several others will also be seen. If you look down from the viewpoint you can see the freeway and trains, but if you move back from the edge, you see very little that is manmade. If you walk out on the

Rowena Plateau and Tom McCall Preserve, you see fields of spring flowers and nothing manmade except a distant historic barn from much of it. But from everywhere on the plateau you will see the wind towers, changing the character of this beautiful, pristine preserve to something industrial..

The following is a list of important public viewing areas that are within 5 miles of the wind towers. According to the application from UPC the towers will be visible from 9 of the 26 listed "key viewing areas" of the Gorge, but they left out Old Hwy 8 (formerly Rd. 1230) on the Wa. Side, with Catherine Creek wildflower and hiking area and Rowland lake fishing and boating area, so really it is ten. The Management Plan for the Gorge says "key viewing areas" are "those portions of important public roads, parks, or other vantage points within the Scenic Area from which the public views Scenic Area landscapes. These include:" and then a list is given, but the words "these include" indicate the list is not meant to be exhaustive. Some places I include, such as Doug's Beach, a hugely popular windsurfing area, are not on the explicit list of key viewing areas but meet the definition. (Doug's Beach and some others barely existed when the list was made. Doug's Beach is on Hwy. 14, a listed key viewing area.)

On the Oregon side, as mentioned, the nearest wind tower will be ½ mile from McCall Point (listed), and 1 ½ miles from Rowena Crest Overlook and The Tom McCall Preserve on the Rowena Plateau (listed), The nearest wind tower will be 1 ¼ miles from Mayer State Park picnic area and boat launch, 1 mile from Mayer Park East Windsurfing Area, ¾ mile at closest from Hwy. 30 (listed), 7/8 mile at closest from I-84 (listed), 2 ½ miles from the top of Chenoweth Table, a Forest Service recreation area above The Dalles, 3 ¼ miles from Franz-Taylor Lake and the nearby part of the new Riverfront Trail in The Dalles, and 1 mile from the Columbia River itself (listed).

On the Washington Side, the whole town of Lyle will look right across the river at the wind towers. The Lyle Hotel is 2 miles from the nearest tower. The Lyle Mercantile is 2 ¼ mile away. UPC did a simulation of what the towers would look like from near the mouth of the Klickitat River in Lyle, and nine towers could be all or partially seen. The number seen would increase higher on the hill in Lyle. (My calculations suggest that their simulation makes the towers too small by about 1/3, incidentally.) Hwy. 14 (listed) is at closest 1 ¾ miles, Doug's Beach is 2 ¼ miles, the trailhead for the Klickitat Trail, in Lyle on Hwy 142 (listed) at its intersection with Hwy. 14, is 2 1/3 miles, the Cherry Orchard trailhead, a pullout on Hwy. 14 just east of the Lyle Tunnels, is 1 ¾ miles, Chamberlain Rest Stop and Viewpoint on Hwy. 14 is 3 ¼ miles, the new Forest Service Lyle-Balfour Park west of Lyle on Old Hwy. 8, formerly Hwy.1230, (listed) is 2 ½ miles, the parking lot for Catherine Creek, a major wildflower viewing and hiking area with a paved, handicapped accessible trail, is 4 ½ miles, and the boat ramp and fishing area for Rowland lake, on Old Hwy. 8 near its west intersection with Hwy. 14, is 5 miles.

The wind towers will be highly visible from all these locations. I have driven the roads and taken pictures from most of them. I have not listed places such as The Columbia Gorge Discovery Center or Memaloose Viewpoint on Hwy 30, which are within 5 miles but from which I don't think the towers will be visible.

At all these important recreation and viewing areas the towers will be large, moving, and on the horizon, and therefore will dominate the view. The view from many of these locations is now pristine or close to pristine, with perhaps a few houses in the distance, or perhaps the railroad tracks and the road across the river, but sometimes not even these

can be seen. In all the Washington locations the towers would be seen looking across the river, and would be an important part of the river view. At McCall Point and Rowena Crest Overlook, Sevenmile Hill is on the right while looking upriver, so is also a prominent part of the river view.

These towers will be visible from I-84 and Hwy. 14 on and off through most of the eastern part of the Gorge. The places listed above are within 5 miles of the towers and are mostly affected by the “north array”, the northern 20 towers. Chenoweth table and the Riverfront trail as well as most of The Dalles, though, will see all three arrays. At greater distances from Sevenmile Hill all three arrays will be visible from both east and west of the hill, since the central and south arrays (another 20 towers total) are on a crestline of the hill that runs southwest toward Mt. Hood. On I-84 east-bound, Sevenmile Hill and the future towers first become visible at the exit for the Hood River Bridge (mp.64.8). The lovely view up river from the Hood River Inn looks directly at Sevenmile Hill over the river in the distance. They will be seen upriver from the whole Oregon side of the Hood River Bridge (.7 miles on the bridge). Westbound on I-84, Sevenmile Hill and the future towers first become visible at the Celilo Exit on I-84 (mp. 97.3). Sevenmile Hill is very visible from the beach at Celilo Park, again seen right over the river in the distance. This is the site of the former Celilo Falls. Sevenmile Hill is visible on and off from I-84 for 32.5 miles. This generally includes all three arrays.

On Hwy. 14 eastbound, Sevenmile Hill (and the future towers) first is seen at mp. 60.8, about a mile west of the Spring Creek Fish Hatchery, a favorite windsurfing spot. The “Hatchery” will get a great view of the towers. Coming westbound on Hwy 14, the towers would first be visible at mp. 96.5, about a mile west of entering the National Scenic Area and about a mile east of the east road into Wishram. On Hwy. 14 the towers would be visible on and off for 35.7 miles. There are three scenic interpretive overlooks on Hwy 14 between Wishram and Horsethief Lake State Park with Lewis and Clark and Native American interpretive signs, and wind towers will be visible from all of these.

On the Cook-Underwood Road (listed) in WA west of the White Salmon River there are a few outstanding overlooks with river views, and Sevenmile Hill is seen right over the river from them. I have a photo from the top of Dog Mountain (listed), and the top of Sevenmile Hill (and therefore the windtowers) can be seen on the horizon in the distance.

Further away the towers will not be so large in the view, but because they are on the horizon, at the top of the hill against the sky, and generally the blades are moving, they will be noticeable and attract the viewers’ attention at a great distance.

The point is that these wind towers will become a dominant part of the view for many nearby key viewing areas (both listed and unlisted), and also will be visible and attract attention over more than a 30 mile stretch on both of the Gorge’s main highways and from other distant viewpoints such as Dog Mountain. The issue is not whether wind towers are beautiful or ugly. The National Scenic Area was created to preserve NATURAL scenic views, and to protect those views from further human encroachment. I have gone out into Wasco Co. wheat fields to photograph wind towers (notice that wheat fields are a manmade landscape) and find them totally appropriate there. We are lucky in Oregon to have many appropriate areas for wind towers, where the wind is good and the population is low. But we have only one Columbia River Gorge National Scenic Area in the whole Country. To sacrifice it and industrialize many of its major views for 40 or even many more wind towers, especially when we have many other places to put

wind towers, is not right.

If you do approve this project in spite of your Scenic and Protected Area standards, when the wind towers here are so close to key viewing areas and clearly are an adverse impact (by the standards in the National Scenic Act Management Plan for building) on what the Scenic Area Act was designed to protect, you will be setting a dangerous precedent. You will be deciding that seeing wind towers cannot be an adverse impact on any protected view, and will basically be eliminating your ability to later decide that, say, windtowers should not be visible from Multnomah Falls or Crater Lake or Ecola State Park.

Like you, I support clean, renewable energy. But we now realize that perhaps not every dam that was built was a good idea. With wind towers, there are many appropriate sites, especially large farms and ranches where towers aren't prominently visible from National Parks, Monuments, Scenic Areas, or Recreation Areas, and where the people most affected are also the people getting some financial benefit. Perhaps there soon needs to be federal regulation for wind tower placement, giving restrictions on how close they can be to residences, schools, etc, and also restrictions on how visible they can be from places nationally preserved for natural beauty. In the long run this would be healthier for the wind power industry too, because it would prevent a backlash that may occur if, in our initial enthusiasm, we put up wind towers everywhere without considering consequences. But meanwhile the Facilities Siting Council thankfully has standards to make this decision, and standards which are clearly violated by this project. These towers will be a very adverse effect on the natural scenic beauty of a very large and important part of the Columbia Gorge National Scenic Area. The losses here outweigh the benefits, because we have only one Columbia River Gorge which people come from all over the world to explore and enjoy, whereas Oregon is blessed with many, many other usable wind tower sites. Please reject this proposal.

Thank you for your time in reading this, and for considering this issue carefully.

Most Sincerely,
Barbara Robinson